

Future approaches to quality assessment in England, Wales, and Northern Ireland

Consultation

June 2015

HEFCE 2015/11

Quality Assessment Review

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Future approaches to quality assessment in England, Wales and Northern Ireland: Consultation

To	Heads of higher education institutions in England, Wales and Northern Ireland Chairs of governing bodies of HEIs in England, Wales and Northern Ireland Heads of other higher education providers Students' representatives Professional, statutory and regulatory bodies Key stakeholders with an interest or involvement in the regulation of higher education Individuals and organisations with an interest in quality assessment in higher education
Of interest to those responsible for	Quality assessment and quality assurance, Academic governance, Student information
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Purpose

1. This document sets out for consultation the proposals of the three higher education (HE) funding bodies in England, Wales and Northern Ireland for future approaches to quality assessment. The consultation represents the next phase of the Quality Assessment Review initiated by the funding bodies in October 2014 as part of each funding body's statutory duty for quality assessment in higher education.

Action required

2. Please respond by **noon on Friday 18 September 2015** using the online form. Those responding in relation to the proposals as they would apply in Wales should do so by **noon on Monday 31 August 2015** using the same form.

Introduction

3. This document sets out for consultation the proposals of the three higher education (HE) funding bodies in England, Wales and Northern Ireland for future approaches to quality assessment¹. The consultation represents the next phase of the Quality Assessment Review initiated by the funding bodies in October 2014² as part of each funding body's statutory duty for quality assessment in higher education:

- a. In England, HEFCE's powers in this area are set out under section 70 of the Further and Higher Education Act 1992.
- b. In Wales, the statutory underpinning for HEFCW's quality assessment responsibilities as set out in the Further and Higher Education Act 1992 (the 1992 Act) is replaced from 1 September 2015 by new responsibilities under the Higher Education (Wales) Act 2015³ (the 2015 Act). Further information is included in Annex C. This consultation relates to HEFCW's existing powers under the 1992 Act. HEFCW will specifically consult further under the express provisions of the Higher Education (Wales) Act 2015 at the appropriate time and no questions are included in this document related to those powers.
- c. In Northern Ireland, DEL's powers in this area are set out under Article 102 of the Education and Libraries (Northern Ireland) Order 1986.

4. The consultation meets the commitment the three funding bodies made at the start of the Review to bring forward specific proposals for the future.

5. The Scottish Funding Council is reviewing its own arrangements for quality assessment in a separate, but parallel, process.

6. The proposals in the consultation have drawn on the advice and guidance provided by the Quality Assessment Review Steering Group and on a number of sources of information and feedback:

- our analysis of the written responses to the discussion document published by the steering group in January 2015
- discussions at the series of events held between January and March 2015
- the work conducted by the Higher Education Academy on the external examining system
- other studies that were commissioned in support of the work of the steering group.

¹ Throughout this document 'we' and 'our' refers to one or more of the three funding bodies.

² To inform the review a discussion document was published in January by the steering group, see www.hefce.ac.uk/reg/review/discussion.

³ See www.legislation.gov.uk/anaw/2015/1/contents.

7. This material has been published on the HEFCE website and can be found at www.hefce.ac.uk/reg/review/discussion/.

8. This consultation will run until **Friday 18 September 2015**; please respond using the online form as detailed at Annex A. We welcome responses from anyone with an interest in quality assessment in higher education. Given the implications of the HE (Wales) Act, the consultation closing date for Wales will be Monday 31 August 2015. This is because the consultation is being undertaken under the 1992 Act powers, which are repealed in Wales from 1 September 2015.

The changing landscape

9. The discussion initiated by the Quality Assessment Review Steering Group in January 2015 prompted a very wide range of views. At a high level, these cover the ground from 'little change is required' to 'substantial change is necessary'. No single consistent picture of future arrangements emerged from the written responses or from discussions at the series of events. It is therefore clear that there are several quite difficult issues to navigate and that different approaches are possible. The current proposals represent one approach that seems to us best able to meet the challenges of the future. However, we acknowledge that there will be different views and this consultation should not be seen to be closing down debate and discussion. We are clear that the recommendations made to the Board of each funding body in the autumn will be informed by the range of views expressed during this consultation as well as any other changes in the broad quality landscape.

10. It was, however, possible to identify a number of areas of broad consensus:

- the integrity of academic standards must be maintained
- respecting the autonomy of institutions continues to be vital
- excellence and innovation in learning and teaching should be supported and developed
- peer review and external review remain a valuable element of our arrangements
- the quality of the student academic experience should remain a primary concern
- a quality assessment system should be proportionate and risk-based and should, where possible, minimise the burden and cost on providers by making use of existing data and information.

11. At a more detailed level, responses and discussions were very helpful in providing a range of views and challenging and developing thinking in some key areas.

12. We are presently persuaded that the key characteristic of the future landscape is its fast increasing diversity: respondents to the discussion document have been able to identify trends, but a common theme in responses has been the difficulty in determining precisely the nature, scale or extent of likely changes. It is this dynamic future that has framed the thinking in this consultation, particularly when combined with those responses

that argued for a quality assessment system better able to accommodate and support changes in the operating environment for providers.

13. The implications of the increasing diversity of the future landscape are common to the higher education systems across the four nations of the UK. Some changes, however, are particularly relevant for each country. In England, the more marketised environment – characterised by the introduction of higher tuition fees and the removal of student number controls for undergraduate students – and the opening of the higher education system to new types of providers that are currently regulated separately are particularly relevant.

14. For Wales, further information about the implications of the HE (Wales) Act can be found in Annex C.

15. In Northern Ireland, the landscape is slightly different as the fee structure for home students is unchanged (lower tuition fees and block grant provided to higher education institutions (HEIs) by government), student number controls remain in place and, to date, there is less diversity in terms of providers. However, the arrangements for students from other parts of the UK and outside the EU do differ and the sector is expected to become more diverse over the period in question.

16. The proposals for consultation set out a common framework for future approaches to quality assessment across England, Wales and Northern Ireland. This reflects the large number of responses to our discussion document that stressed the importance of maintaining, as far as is possible in a country with devolved responsibility for higher education, a sense of the continued importance of a UK-wide approach. In particular, the following elements of these proposals would provide a consistent approach, or 'read-across', for future quality assessment arrangements in England, Wales and Northern Ireland:

- the principles for quality assessment in established providers (see paragraph 30)
- the definition and operation of a common baseline requirement for entry to the higher education system (see paragraph 37)
- the written expression of academic output standards (see paragraph 82)
- the external examining system (see paragraph 83)
- the role of the governing body (see paragraph 56).

17. However, the differing national contexts provide different flavours to the proposed implementation of future approaches in each country.

The broad shape of our proposals

18. A large number of the responses to the discussion document suggested that some change to the current arrangements would be necessary if quality assessment were to continue to be fit for purpose to 2025. Respondents were keen to ensure that future arrangements could provide assurances in areas not fully addressed by the current

arrangements, in particular in relation to the security and comparability of academic output standards, and of student academic outcomes more broadly.

19. Reflections on the changing nature of the higher education landscape have led us, the funding bodies for England, Wales and Northern Ireland, to propose options that differ in some respects from current arrangements, and that place more emphasis on the responsibility of autonomous providers to safeguard academic standards and the quality of the student learning experience, in the context of their own diverse missions and the diverse needs of their students. At the same time we are seeking to ensure that certain core assurances – which are not well addressed by the current arrangements – can be provided to students, government, taxpayers and other stakeholders in the matters that are important to them. We wish to achieve this without placing a disproportionate and costly regulatory burden on providers who can evidence continuing safe custody of standards and quality. Conversely, when things go wrong it is important that problems are identified early and addressed rapidly in a proportionate way; the quality assessment approach must have ‘teeth’.

20. The consultation proposals, therefore, necessarily diverge from current arrangements but in some respects represent an evolution of existing practice. In particular, we are proposing to strengthen three key elements of the arrangements already in place within the sector and institutions:

- institutional governance arrangements
- the external examining system
- data-driven continuous improvement in learning and teaching.

21. There was a degree of consensus in responses to the discussion document that these mechanisms were valued and important, and that, whatever quality assessment regime is designed, they needed strengthening in a meaningful way. We agree with this view. The proposals accordingly set out the nature of the ‘strengthening’ that we believe would be necessary for the existing governance arrangements in the sector to provide greater assurance about standards and academic quality, and for the external examining system to be improved. The publication of the current edition of the Higher Education Code of Governance has already prompted institutions to consider further their approach to the role of the governing body in matters of academic governance. The proposals contained in this consultation will dovetail with this ongoing development, and will draw on the support for the development of governance activities already put in place through the Leadership Foundation for Higher Education.

22. A feature of this consultation’s proposals, therefore, is a greater reliance on an institution’s own review and governance processes, on data already submitted or to be submitted to the funding bodies, and on the strengthening of a number of the external elements already in the assurance system. However, compared to the current arrangements, there would be a significantly reduced requirement for the cyclical review of **baseline** compliance conducted by an external agency.

23. It is important to note that although these proposals rely more fully on existing elements of the system, this does not mean that we are proposing the dilution of external scrutiny of a provider's arrangements. Rather, we are seeking to ensure that more appropriate external scrutiny is applied to the areas that matter most to students and other stakeholders – indeed areas which are not currently addressed fully – and that unnecessary and costly burden elsewhere is removed. This represents our definition of 'co-regulation':

- the operation of assurance processes by autonomous providers and by the sector as a whole, for example the external examining system
- the testing of assurances about these institution- or sector-owned activities by the relevant funding body – in partnership with other independent bodies where appropriate – in fulfilment of its statutory duty for quality assessment.

24. This consultation document seeks to provide high level proposals about the aims, focus and broad shape of a future quality assessment system, rather than to provide considerable operational detail. We expect to engage further and consult as appropriate about such practical detail in a later 'design' stage. Nevertheless, it is clear to us that the following activities would be undertaken by one or more organisations external to the funding bodies if the current proposals were to be taken further:

- the operation of detailed external independent peer review of providers seeking to enter the publicly funded system, as tested against the baseline requirements
- the development and delivery of training for external examiners and the maintenance of the 'register' of external examiners
- the operation of a review to re-test the compliance of an individual provider against the baseline requirements as a consequence of confirmation that there is a problem in that particular provider
- the provision, where necessary, of independent advice to the relevant funding body to inform its assurance work in relation to an individual provider
- the provision of consultancy to assist governing bodies in reaching their annual assurances about standards and the student academic experience
- the awarding of accreditation 'kite marks' for providers who wish to operate internationally and feel that this would be beneficial.

25. The proposals should not be seen to cast doubt on the ability of the current system to secure the reputation of the UK higher education system over recent years, although later in this document we note some concerns expressed during the discussion period about the continuing appropriateness of current arrangements for the future. Our purpose throughout has been to consider what kind of quality assessment arrangements will be necessary as we look towards 2025, rather than to review the effectiveness of the current approach. Throughout the discussions, we have been clear that preserving and indeed strengthening the reputation of the UK higher education system must be an essential component of thinking about future arrangements.

The proposals for consultation

26. This consultation document sets out proposals that relate to England, Wales and Northern Ireland. Where there are issues that relate specifically to one of the countries, these are identified in the text in a shaded box. The document presents proposals and seeks responses in six areas:

- a. Principles for a quality assessment system for established providers.
- b. Student academic experience for established providers.
- c. Academic output standards for established providers.
- d. 'When things go wrong' in established providers.
- e. Excellence and innovation in learning and teaching.
- f. Gateways into the higher education system for new providers.

27. The first four sections set out proposals for consultation on core quality assessment issues for established providers in England, Wales and Northern Ireland.

In England

HEFCE defines 'established' providers in the context of this consultation as those providers who have already entered the publicly funded sector in England.

In Northern Ireland

DEL defines established providers as any provider that has received successful course designation from the Department, whether that designation is 'automatic' by virtue of degree awarding powers or specifically granted by the Department.

28. A diagram illustrating the shape of the proposed future arrangements for quality assessment for established providers in England is provided as Annex B.

29. The proposals in the final two sections – on excellence and innovation in learning and teaching and on the gateways into the higher education system – are presented as necessary components of a broad-based quality system but we envisage that they should be complementary components that sit separately from the regulatory quality assessment arrangements for established providers.

Principles for a quality assessment system for established providers

30. After considering the responses to the discussion document, we have refined the list of principles that we propose should underpin future approaches to quality assessment. It is proposed for consultation that a future quality assessment system should:

- a. Be based on the autonomy of higher education providers with degree awarding powers to set and maintain academic standards, and on the responsibility of all

providers to determine and deliver the most appropriate academic experience for their students wherever and however they study.

- b. Use peer review and appropriate external scrutiny as a core component of quality assessment and assurance approaches.
- c. Expect students to be meaningfully integrated as partners in the design, monitoring and reviewing of processes to improve the academic quality of their education.
- d. Provide accountability, value for money, and assurance to students, and to employers, government and the public, in the areas that matter to those stakeholders, both in relation to individual providers and across the sector as a whole.
- e. Be transparent and easily understood by students and other stakeholders.
- f. Work well for increasingly diverse and different missions, and ensure that providers are not prevented from experimentation and innovation in strategic direction or in approaches to learning and teaching.
- g. Not repeatedly retest an established provider against the baseline requirements for an acceptable level of provision necessary for entry to the publicly funded higher education system, unless there is evidence that suggests that this is necessary.
- h. Adopt a risk- and evidence-based approach to co-regulation to ensure that regulatory scrutiny focuses on the areas where risk to standards and/or to the academic experience of students or the system is greatest.
- i. Ensure that the overall cost and burden of the quality assessment and wider assurance system is proportionate.
- j. Protect the reputation of the UK higher education system in a global context.
- k. Intervene early and rapidly but proportionately when things go wrong.
- l. Work towards creating a consistent approach to quality assessment for all providers of higher education.

31. We believe that these proposed principles provide a framework within which it is possible to design a quality assessment approach that is sufficiently flexible to meet the challenging nature of the future landscape of the higher education system. The practical proposals for this quality assessment approach are set out in the sections that follow.

Question 1: Do you agree with our proposed principles to underpin the future approach to quality assessment in established providers?

A note on externality

32. Taken as a whole, our current proposals represent a reshaping of the role and focus of external independent scrutiny in a future quality assessment system. This should not be read as a reduction or dilution of scrutiny, with institutions free to operate outside

of any kind of assurance framework. Indeed, each funding body is required by law to ensure that provision is made to assess quality in those institutions it funds or is considering funding. 'Externality' as a key principle remains important and these proposals will result in arrangements that comply with the requirements for externality set out in the Standards and Guidelines for Quality Assurance in the European Higher Education Area.

33. So the current proposals seek to achieve two aims:

- a. To focus meaningful external scrutiny on those areas that matter to students and other stakeholders: academic output standards, improvement of student outcomes and the academic experience, and where there is evidence that things are going wrong in a particular provider.
- b. To reduce bureaucracy and regulatory cost in other areas where we have heard concerns about the unnecessary and unhelpful burden placed on providers by the current arrangements, for example, in the formation and management of new kinds of partnerships both at home and overseas.

34. The following provides a summary of what is meant by 'meaningful external scrutiny', as embedded within the proposals for consultation:

- in an institution's own review of its courses – from professional, statutory and regulatory bodies (PSRBs), employers, national and international peers, and alumni
- through the external examining system – from external peers who are trained, supported and registered by an external sector body which is not the funding bodies
- through the calibration of degree standards and the consistency of degree classification algorithms – led by the sector but operationalised through external peer review and with relevant PSRBs
- by governing bodies of institutions – with a majority independent membership, based on the Higher Education Code of Governance and using evidence from PSRBs, external examiners and others, and such external advice as the governing body wishes to procure (if at all)
- through the use of the relevant funding body's established independent assurance review process in partnership with appropriate professional external advice – overseen, as appropriate, by the board of the relevant funding body, on the basis of careful scrutiny by the relevant strategic advisory committee
- during an initial external and independent review against the baseline requirements for quality for providers wishing to enter the higher education system
- during a review of an established provider where there is evidence that something serious or material may have gone wrong in relation to the integrity of academic output standards or the student academic experience.

Question 2: Do you agree that our current proposals for the use of meaningful external scrutiny as set out above are sufficient? If you do not agree, please indicate what additional or different external scrutiny you propose and provide the reasons for this.

Student academic experience

Core message

The quality of the academic experience is vital to students, and ensuring that students' reasonable expectations are met is a core responsibility of providers. A key role of a quality assessment system is to ensure that providers are routinely analysing student outcome data, including feedback and complaint information, and can demonstrate that they are taking action to maintain and improve the student academic experience in ways appropriate to their students and their mission.

35. One of the strongest and most consistent messages that came through the discussion period was that the current diversity of provision within the sector means that 'one size' of quality assessment cannot any longer fit all. Respondents also consistently confirmed that they expected the diversity of providers, provision, and students to continue to increase. Analysis of responses identified different strands within the idea that 'one size does not fit all':

- beyond a baseline requirement for the quality of student academic experience, we should recognise that there are 'student experiences' – and therefore different concepts of 'quality' – that could and should be determined by the mission of the provider, the type of provision, and the needs of the student
- the powers and responsibilities of those providers with degree awarding powers differ from those of providers that do not have these powers
- even after they have entered the higher education system different types of provider, at different stages of their development, have governance systems of differing maturity, and with differing capability to provide reliable assurances about the student academic experience.

36. The argument that one size can no longer fit all is persuasive. These consultation proposals are, therefore, based on the assumption that an individual provider should determine a rigorous and consistent basis on which routinely to analyse student outcomes data, and to develop the academic experience in an appropriate manner with and for its students, with meaningful external input. The funding bodies would expect to verify a provider's approach, and would vary the extent of oversight for those providers able to demonstrate a strong methodology and mature internal governance arrangements. We believe that this would significantly reduce the regulatory cost and burden for many providers as it would remove the need for repeated and routine 'one size fits all' cyclical quality reviews against the baseline requirements.

Question 3: Do you agree that future approaches to quality assessment should be based on an assumption that ‘one size’ can no longer sensibly fit all?

Baseline requirement for the quality of the student academic experience

37. We have currently concluded from responses received that there should be a baseline requirement for the quality of academic provision for students. We would expect this baseline requirement to be published and developed over time to ensure that it remains compliant with Part 1 of Standards and Guidelines for Quality Assurance in the European Higher Education Area⁴.

38. We believe that this general approach fits well with the principles set out above, and also works with the views set out recently by the Competition and Markets Authority (CMA)⁵ on the regulatory framework for higher education.

Question 4: Do you agree that there should be a baseline requirement for the quality of the academic experience for students, and that this should be published and maintained?

39. However, the differing contexts in England, Wales and Northern Ireland mean that this UK-wide shared expression of minimum requirements is likely to be used in different ways.

In England

HEFCE’s view is that there should continue to be an independent peer review mechanism to test a provider’s readiness to enter the English publicly funded higher education system, and this should include a test against a baseline requirement for the quality of academic provision for students and of academic output standards. See paragraphs 113-116 for more details about gateways into the sector.

The ability of a provider to give reliable assurances about the continuing quality of provision through its governance processes would continue to be an important element of this robust external scrutiny process. Thereafter, we propose to assume that a provider will continue to meet the baseline requirements unless or until material evidence emerges to suggest otherwise. The implication of this approach is that providers established within the sector should not be repeatedly tested against the baseline requirements – unless prima facie evidence emerges to suggest that this is necessary – but should be free to determine for themselves what a good and improving student academic experience should look like in the context of their own mission and student body, and to confirm that promises made to their students are kept.

⁴ See www.enqa.eu/wp-content/uploads/2015/05/ESG_endorsed-with-changed-foreword.pdf.

⁵ See https://assets.digital.cabinet-office.gov.uk/media/550bf3c740f0b61404000001/Policy_paper_on_higher_education.pdf.

We believe that this approach fits well with the principles proposed to underpin a future quality assessment system, and with the views set out recently by the CMA on the regulatory framework for higher education. We also believe that it is appropriate for the more marketised English context of higher tuition fees for undergraduate students and the removal of student number controls for most providers. We heard clearly during the discussion phase that providers in the English system felt that market pressures were sufficient to incentivise them to ensure that they continue to offer a high quality student academic experience and excellent student outcomes, without the need for a repeated costly and extensive external scrutiny process at the baseline or threshold level.

Question 5: For England, do you agree with the proposal that an individual provider, once it has passed the gateway for entry into the publicly funded system in England, should not be repeatedly externally retested against the baseline requirements for an acceptable student academic experience, unless material evidence suggests otherwise?

In Northern Ireland

DEL has a statutory duty to make provision for the assessment of the quality of the teaching provision that it funds at all Northern Ireland higher education institutions. In addition to securing entry to the higher education system (for new providers), the ability of a provider to supply reliable routine assurances about the continuing quality of provision through its governance processes will be important.

In Northern Ireland, DEL's current view is that we would expect to receive more routine assurance at the outset of the new arrangements, possibly supported with independently gathered evidence, but that the intention would be to reduce this requirement over time.

Question 6: For Northern Ireland, do you agree that providers should provide annual evidence and assurance that they are meeting the baseline requirements for an acceptable student academic experience?

Review of the student academic experience and student outcomes

40. In the discussion document published in January we asked a series of questions to gain views about whether a cyclical process to review student outcomes and the student academic experience in an individual provider should be conducted by the institution itself, or be internal with external verification, or be external and completely independent of the provider. Responses provided a mixed picture, but most indicated that some form of externality would be important to ensure that internal processes continued to be effective in providing reassurance to stakeholders. There was also support for a move away from a large-scale cyclical external review process towards simpler, routine annual activities. Many respondents also said that the focus of attention should be on providers or activities that represent higher levels of risk, rather than on all with the same level of intensity or frequency of external review.

41. The broad themes emerging from the earlier discussion have led us to propose for consultation that, once a provider has passed through the gateway to enter the higher education system, its own periodic review process – which needs to contain strong external elements – should be the key mechanism to improve student academic outcomes and the academic experience. We would expect this institution-conducted review process to be designed on the following basis:

- a. It is focused at the level of the academic unit(s) that makes sense for students' learning; this could be a department or cluster of departments.
- b. It is focused on data and information relating to the outcomes of students, rather than the processes operated by the department or institution.
- c. It has students fully and meaningfully involved in reviewing evidence, reaching judgements, and making recommendations for future developments and improvements.
- d. It includes significant and meaningful external input including from employers, national or international peers, recent alumni.
- e. It focuses on the continuous improvement of learning and teaching and the student academic experience, and the associated outcomes that matter to students and/or external stakeholders in the particular department or subject area under review.
- f. It subsumes other review or accreditation activities and events, for example quinquennial programme reviews and PSRB accreditation reviews, thus reducing duplication of effort and cost while ensuring a strong element of external scrutiny on a rolling basis.

42. Each funding body would expect to verify the approach taken by an individual provider to its own review processes. The purpose of this external verification would be to ensure that the chosen approach was sufficiently robust and had sufficient strong external scrutiny built into it. This mechanism would also be used to support the development of internal review methods in less mature providers. The funding bodies would develop and publish, as voluntary guidance, a series of case studies of different but effective approaches to internal review. Once the capacity of a provider to continue to undertake its own review had been established – against a set of published criteria that included the effective use of external scrutiny – the provider would only need to confirm, through its annual accountability statement, that the reviews scheduled for the year in question had been completed; the outcomes discussed by the academic board, senate (or equivalent) and the governing body; and an action plan implemented.

43. We would expect to test different approaches to institutions' own review activities through pilot activity with a range of providers in 2016-17.

Question 7: Do you agree that the funding bodies' verification of an institution's review methodology provides a reasonable mechanism through which to operate risk-based scrutiny of a provider's arrangements to secure a good and improving student academic experience and student outcomes?

44. We have proposed above that an institution's own review processes should have students fully and meaningfully involved in designing processes, reviewing evidence, reaching judgements, and making recommendations for future developments and improvements. This reflects the view of the funding bodies that student engagement and partnership remain essential components of future quality assurance and quality assessment arrangements. We expect to continue to provide support in this area, for example through the funding currently provided in England to the Student Engagement Partnership⁶.

Using student outcomes data to secure and improve the student academic experience

45. A significant number of responses to the discussion document identified a need to undertake a major shift in quality assessment and assurance activity to focus more on student outcomes than institutional processes. The proposals in this consultation take such a shift in focus as essential if a quality assessment system is to be accountable to students and other stakeholders in the areas that matter to them.

46. The funding bodies expect to continue to develop and publish a range of UK-wide indicators that focus on student outcomes, and are reviewing the work in this area to ensure that published information is able to meet the needs of students, institutions and other stakeholders in the future as well as currently.

47. In the context of response to the first discussion phase we have concluded that this collection of student outcomes data will be important in two key areas:

- its use within an individual provider at the heart of their mechanisms to drive continuous improvement in learning and teaching and in the student academic experience
- its use by the relevant funding body to undertake routine monitoring of institutional performance as a way to identify signs of concern about that student academic experience.

48. Our intention in a 'whole system' approach to quality is that data should be collected once but used many times. Paragraphs 109-112 set out more information on incentivising excellence.

49. We heard through the discussion phase that individual providers now have the capacity to use key outcomes data – including the National Student Survey and Destinations of Leavers from Higher Education survey, together with HESA staff, student

⁶ See <http://tsep.org.uk/>.

and institutional data – to analyse and improve the academic experience for their students in their own context. Feedback has also confirmed that publication of this data, through Unistats and also by third parties in league tables and comparison sites, has provided an impetus for institutions to focus on aspects of learning and teaching performance that can be improved towards excellence for their institutional setting. We therefore propose in this consultation to build these existing institutional activities more formally into future approaches to quality assessment. Each funding body would expect to see individual providers making effective use of a range of outcomes data relevant to their own mission, provision and students. This routine analysis would provide the basis for internal reflection on the quality of student outcomes and the learning and teaching experience that is delivering these, as well as a framework within which continuous improvement activities could be planned and implemented.

Question 8: Do you agree that student outcomes data should provide the basis for continuous improvement activities within an individual provider?

50. Several responses to the discussion document suggested further ways to develop approaches that are already used by the funding bodies to monitor for early warning signs about the student academic experience. They argued for the extension of this approach into a more substantial component of external quality assessment arrangements. Typically, respondents were interested in the funding bodies using existing data about student outcomes to monitor individual providers, and to take action when the data suggested that this was necessary. This type of approach was framed as a way to reduce the burden on providers who were able to demonstrate continuing good student outcomes, and thereby to develop a risk-based operation of quality assessment activities. We believe that this fits well with the preference expressed to avoid 'one size fits all', and we propose to adopt this approach.

51. We would expect this monitoring activity to be undertaken by the relevant funding body and to include the analysis of trends of student recruitment, progression and achievement, and of student outcomes more broadly. Routine discussion with a provider about the trends in its data would be incorporated into the 'annual meeting' conducted by the relevant funding body. The identification and analysis of data trends and patterns would also provide a basis on which to enter further specific dialogue with an individual provider where evidence suggested that this was necessary, for example, where patterns suggested that a provider was consistently below the performance of its peer group. The purpose of such dialogue would be to establish with a provider whether the data pattern represented a genuine issue that required resolution or not.

52. In these circumstances, it would be for the governing body, in the first instance, to put in place and to be responsible for the solution or strategy needed to address any confirmed issues. If, however, there remained evidence of persistent decline or underperformance despite strategies having been put in place, the relevant funding body would signal the issue formally, for example as a comment in the annual risk letter used in England. The relevant funding body would then continue to monitor for signs of improvement, recognising that this might in some circumstances take time, and would if

necessary make use of the further interventions set out in its existing accountability framework. The relevant funding body may choose to seek independent professional advice to inform its engagement with the provider.

53. Throughout this process, the relevant funding body would remain mindful of the complexities involved in making judgements about the performance of a higher education provider and would recognise that data analysis and dialogue in these circumstances would need to be robust, sophisticated and nuanced.

54. We propose to explore further the most appropriate approaches to the use of data to identify patterns and trends through pilot activity in 2016-17 and propose also to use this period to develop existing approaches to engagement with providers.

Question 9: Do you agree that we should take forward into detailed design and pilot phases further work on the use of student outcomes data to identify patterns and trends and on the development of approaches for monitoring and supporting institutions as they address areas of concern?

55. As greater reliance is placed on student outcomes data, the funding bodies are mindful of the need for any indicators to be meaningful and to measure the things that matter to students and other stakeholders. Data would need to be robust and valid, and its collection efficient and cost-effective. The funding bodies will continue to develop this strand of their work using a clear evidence base, expert input and consultation with the sector. Care is needed to be taken to ensure that particular metrics do not privilege particular providers, learners, or modes or levels of learning.

In Northern Ireland

The Department is currently developing an outcomes based approach to higher education funding in order to encourage higher education providers to contribute towards the outcomes desired by government in return for its investment. The outcomes will be based on the key strategic priorities of the Department, and will be linked to those within Executive and Departmental Strategies.

Capturing and analysing feedback from students on their experience of participating in higher education is crucial for informed decision-making and for identifying areas that are working well and those that require attention. As the revised quality assessment arrangements will place significant focus on student experiences and outcomes, in addition to the projects already being taken forward as part of the Graduating to Success Higher Education Strategy, it is likely that some new activity will be required, particularly with the further education (FE) colleges, to ensure the availability of enhanced information in this regard. The FE colleges do not currently participate in the National Student Survey or any similar survey of student outcomes/experiences. It is anticipated that the forthcoming Further Education Strategy for Northern Ireland will propose that a single approach across colleges to collecting and analysing feedback from learners be introduced. This will enable colleges to benchmark against high performing colleges, and to identify and learn from good practice in Northern Ireland and in other parts of the UK.

Such an approach will provide a clear evidence base for consistent and comparable data to be analysed and utilised within the new quality assessment arrangements.

Question 10: In Northern Ireland, do you agree with the approach outlined above to introduce more effective and consistent arrangements for collecting and analysing feedback from higher education learners?

Assurances through the governance system

56. In discussions with stakeholders we sought to explore the potential for increasing the role of institutional governance in the quality assessment system. A significant number of respondents were confident that further reliance could, and indeed should, be placed on internal academic governance arrangements. This view was replicated in discussions at our roundtable events, although this more informal setting prompted reflection on the variation currently likely to be found in the capabilities of governing bodies to engage meaningfully in this area and the need for support and development.

57. The funding bodies welcome the recent revisions to the Higher Education Code of Governance⁷ and, in particular, the expectations set out for the role of the governing body in the oversight of academic governance. We believe that effective use of the revised Code would strengthen the role of governing bodies such that a quality assessment system would be able to take reliable assurances from each provider on the continuing appropriateness and improvement of the student academic experience and student outcomes.

58. Each funding body would expect the governing body of an institution delivering higher education programmes (whether or not it is the degree awarding body) to provide confirmation about the student academic experience on an annual basis through the regular assurance reporting process operated by the relevant funding body. We would wish to work with the Committee of University Chairs, Association of Colleges and the Association of Heads of University Administration (AHUA), and other relevant bodies, to refine such an annual confirmation, but suggest the following wording as a starting point for discussion:

- ‘the governing body has received and discussed a report and accompanying action plan relating to the student academic experience and student outcomes, including the evidence from the institution’s own review processes which fully involve students
- the governing body has received the outcomes of continuous improvement activity in relation to learning and teaching and challenged the executive where necessary

⁷ While voluntary, the Higher Education Code of Governance sets out an agreed statement of the principles and practices for good governance in the higher education sector. See www.universitychairs.ac.uk/wp-content/uploads/2015/02/Code-Final.pdf.

- the data and evidence used as a basis to improve the student academic experience and student outcomes are, to the best of our knowledge, robust and appropriate.'

59. The relevant funding body would establish a similar annual reporting requirement for those publicly funded providers – for example, further education colleges – that do not currently operate under the existing funding body accountability framework.

60. It should be clear here that the role of the governing body would be to receive reports and challenge assurances from within the institution, rather than to be drawn into quality management activities itself. We recognise the predominant role of senates and academic boards in academic governance, and the responsibility of the accountable officer and senior executive team, and would expect an individual governing body to be clear about the formal relationships between the elements of the governance arrangements in its own institutional context.

61. External independent scrutiny of the assurances provided by a governing body would be undertaken by the relevant funding body through its existing cyclical institutional assurance mechanisms. The purpose of this external scrutiny will be to check the evidence and processes used by the governing body to reach its annual statement on the continuous improvement of the student academic experience and student outcomes, as is done currently for financial management and risk, and for the integrity and accuracy of student data.

62. As it considers these matters, a governing body will wish to consider the full profile of academic risk and may wish to use this to guide its data and information requirements, for example in relation to international or other collaborative partnerships, or students studying at a distance, or in new areas of learning and teaching activity. We would expect a governing body to draw appropriately on the experience of its student members as it undertakes this work. A governing body may wish to engage the services of an external expert or an external organisation to provide an independent view of the appropriateness of internal arrangements to deliver good and improving student outcomes, but in England the funding body would not make this a requirement.

63. The funding bodies propose to work with a number of governing bodies to understand any support they might require as part of the work already commissioned through the Leadership Foundation for Higher Education and through pilot activity in 2016-17.

64. In the responses to the discussion document, and through the recent work undertaken by KPMG on the costs of current approaches, there is evidence of a substantial cost to institutions of internal quality and standards assurance processes. We believe that this may stem from quality practitioners reasonably adopting a risk-averse approach to the requirements of the current external quality assessment regime because of the potential consequences for a provider of a negative judgement. In the short term we would expect these well-developed processes to provide a helpful degree of comfort

that the removal of the current cyclical external review process would not lead to the loss of careful consideration of the quality of the student academic experience. Over the longer term, however, we would encourage senior management teams and governing bodies to consider what efficiencies could provide better protection of academic output standards and improvement of the quality of the student academic experience.

Question 11: Do you agree with the proposal that more emphasis should be placed on the role of a provider's governing body to provide assurances about the quality of the student academic experience and student outcomes in line with the Higher Education Code of Governance? If you agree, please indicate what, if any, additional support they should receive to provide such assurances.

In England

HEFCE would expect to use its current accountability framework to capture and test assurances from governing bodies on the student academic experience and on academic output standards. For HEFCE-funded institutions, the memorandum of assurance and accountability (MAA) sets out the terms and conditions for payment of HEFCE grants and already includes a requirement that the governing body should receive assurances that the institution 'has an effective framework – overseen by its senate, academic board or equivalent – to manage the quality of learning and teaching and to maintain standards'.

We therefore propose to use the existing annual accountability return to collect the quality assessment assurances set out above. We would then use the five-yearly HEFCE assurance review (HAR) light-touch visit to check the evidence and processes used by the governing body to reach its annual statement on the student academic experience and academic output standards, as is done currently for financial management and risk and for student data. We would expect to make minor adjustments to the HAR process to ensure that appropriate engagement with governing bodies in this area can be achieved, and these would be tested in the pilot period. It would be important to ensure on the one hand that the extended HAR was credible and able to draw on independent advice where necessary, but on the other that it did not grow into the burden of a new Higher Education Review.

We would expect to establish a similar reporting requirement for quality assessment matters for those publicly funded providers that do not currently operate under the MAA and the HAR.

Question 12: For England, do you agree that, for English institutions, HEFCE should develop and use the existing external accountability mechanisms, particularly the HAR, in the ways described above?

In Northern Ireland

The proposals in relation to both the student academic experience and academic output standards envisage making greater use of the existing governance arrangements within institutions. In this respect, DEL would expect to use and strengthen its current

accountability framework to ensure that assurances from governing bodies on the student academic experience and on academic output standards are captured and tested effectively.

To capture the expanded requirements an update to the Financial Memoranda between DEL and each university, university college and FE college, or development of new documentation as appropriate, would be expected. The annual accountability process (annual returns, mid and end year assurances, accountability meetings with DEL) will then be used to demonstrate and test whether the necessary requirements are being fulfilled. Due to the relatively compact size of the higher education sector in Northern Ireland, and the frequency of face-to-face contact between HEIs and DEL, it has not been considered necessary to implement a more in-depth three or five year Assurance Review (such as the HAR in England or triennial HEFCW assurance visits). However, consideration will be given to whether such arrangements should be introduced.

Question 13: For Northern Ireland, do you agree that DEL should develop and use the existing accountability mechanisms in the ways described above?

Quality kite mark

65. Responses to the discussion document indicated that it would be important for future quality assessment arrangements to include the publication of visible and reliable evidence of the continued good standing of an individual provider. The funding bodies are clear that this is particularly important in a context where UK-based providers are seeking international partnerships of various kinds.

66. Since August 2014, HEFCE has maintained and published a Register of higher education providers that are regulated in England. The Register carries significant national and international weight as the definitive and authoritative source of information about the powers, responsibilities and current status of an individual provider. It is used by other regulatory bodies in the UK and internationally, by overseas governments and sponsors, and by other potential partner organisations. We expect its use to increase as we extend the range of information published, and we anticipate that further development of the Register would make it possible to include providers regulated in Wales and Northern Ireland.

67. The current proposals for future approaches to quality assessment envisage that the funding bodies would publish on the Register of Higher Education Providers confirmation for each provider that:

- academic standards are set and maintained appropriately and are reasonably comparable
- the student academic experience and student outcomes are appropriate, and steps are being taken to ensure that these are continuously improved
- the data and processes used to secure and improve the student academic experience and student outcomes are robust and appropriate.

68. We expect the presentation of this information on the Register to include a recognisable ‘quality kite mark’ for an individual provider.

69. Under the current proposals, providers would also be free to acquire any other national or international accreditation kite mark they considered appropriate – from organisations in this country or internationally – but the funding bodies would not require that they do this or specify any particular accreditation.

A risk-based approach

70. In paragraph 35 above it is argued that different types of provider, at different stages of their development, may have governance systems of differing maturity. This implies that providers newly through the gateway for entry to the higher education system would be likely to experience increased monitoring by the relevant funding body until such time as evidence suggested that this was no longer necessary. During this period of closer monitoring, the relevant funding body might recommend that the provider make use of additional external expertise in reaching its own judgements about student outcomes and the student academic experience.

71. During discussion, some respondents nevertheless suggested that there should be a formal ‘probationary period’ for new entrants to the sector of several years during which a provider would be re-tested against the baseline requirements by the independent organisation that carried out the initial gateway test. In this consultation we want to test views about whether a formal probationary period would be unnecessary in the context of our proposal to undertake risk-based monitoring of providers.

Question 14: Do you agree that there should be a ‘probationary period’ for new entrants to the publicly funded sector in England?

72. It is also likely that the relevant funding body would consider closer monitoring of an established provider to be necessary in circumstances where there had been significant material changes in a provider, for example through changes to corporate forms or through merger. It is also the case that some activities or strategic developments may represent an increased level of risk for an individual provider or for the system as a whole, regardless of the maturity of a provider. In such cases, closer monitoring may also be appropriate.

73. We should be clear that we would see increased engagement of this type as a normal component of a risk-based monitoring system, rather than as an indication that there is necessarily a material or major problem in a particular provider.

A note on international activity

74. The discussion document asked whether it remains important to include scrutiny of activities taking place outside the UK in future quality assessment arrangements. There was widespread support for continuing to assume that **all** of a provider’s activities,

whether in the UK or internationally, should be the subject of future approaches. But there was also support for finding approaches better able to recognise the national quality arrangements in partner countries. Respondents holding these views were concerned to reduce the current degree of unnecessary duplication of quality assessment involved in establishing international partnerships.

75. We are proposing for consultation that a UK provider should remain fully responsible for student outcomes, and for the quality of the student academic experience, wherever its students are based. In practice, this means that the proposals in this document will apply on exactly the same basis to programmes delivered internationally, whether with a partner or not. The funding bodies would therefore expect to see:

- the use of student outcomes data for students studying overseas to form the basis for review and continuous improvement activity
- the nature of the academic risk associated with a particular international activity to be fully understood and monitored by the governing body
- the assurances provided by the governing body explicitly to cover international programmes and students
- measures for investigating when things go wrong (see the section below) to apply to international activity
- for degree awarding bodies, the section below on academic output standards to apply also to international programmes and students.

76. These requirements will not prevent a governing body from making use of in-country accreditation or consultancy reports in its review of standards or the academic experience – indeed it may be sensible to do so – but it cannot abrogate its ultimate responsibilities by relying without any analysis or oversight itself on another country's accreditation.

77. We note that the development by HESA of data collection in relation to students studying wholly outside the UK will provide a richer set of outcomes data to help governing bodies provide assurance for international activities. We believe that this will also help the relevant funding body to monitor international activity more routinely and effectively.

Question 15: Do you agree that international activities should be included in the remit of future quality assessment arrangements as described above?

Academic output standards

Core message

The maintenance of academic output standards – the achievement required to gain an award – is central to the excellent reputation of the UK higher education system and is important to all stakeholders.

Demonstrating that standards are maintained and are reasonably comparable across the system, despite market and other pressures, should be the core, non-negotiable, component of a quality assessment system.

78. The principles set out above in paragraph 30 confirm the primary responsibility of a provider with degree awarding powers for setting, monitoring and maintaining the academic output standards of the awards for which it is responsible, wherever these are delivered. This is a responsibility that remains with the awarding body regardless of the nature of the relationship with any partner institutions and, as such, we would expect that assurances about the continued secure operation of the mechanisms designed to set and maintain academic output standards to come from the degree awarding body, rather than from its partners.

79. Through the discussion document, at stakeholder events and from the independent research carried out, we have sought to understand the various debates about the need to demonstrate the comparability of academic output standards. The picture that has emerged is one where, broadly, those within the sector are rather comfortable with current approaches, whereas the research evidence provides a more sceptical view of the current arrangements for assuring the comparability of academic output standards, both in individual providers and across the system as a whole. We are able to detect a similar pattern in discussions about the maintenance of output standards over time, with little evidence of an effective counter-narrative to regular claims in the press of 'grade inflation' in undergraduate degrees.

80. We recognise that this is a difficult series of issues, and note that some or all of this has been aired in various national debates over the years. We are, however, clear that there is a strong student and public interest in a regulatory quality assessment system being able to demonstrate that output standards are being maintained and that they are reasonably comparable, particularly at the pass/fail borderline for all awards but also at the 2i/2ii borderline for classified undergraduate degrees, or the equivalent in grade point average (GPA) scores. We also believe that the continuing excellent reputation of the UK higher education system is closely tied to this issue.

81. It is important to note that as funding bodies we are not advocating a shift away from the autonomy of degree awarding bodies to set and maintain standards. Nor are we proposing the development of either a national curriculum or a national student examination. Far from it. Rather, we are seeking to develop established elements of the wider quality assurance system so that clearer assurances can be provided to students, governments and other stakeholders on the issues that matter to them. The details of the proposals in this area are set out below.

Question 16: Do you agree that a future quality assessment system must provide reliable assurances to students and other stakeholders about the maintenance of academic output standards and their reasonable comparability across the UK higher education system?

Written expression of academic output standards

82. Responses to our discussion document often expressed support for the role of the Framework for Higher Education Qualifications in setting standards across the UK system at threshold level. We would support the need for a clear expression of what constitutes higher education at each of its different levels (4-8) and of the amount of learning expected for awards at different levels (be this expressed in credit terms or differently). Only in this way does 'higher education' have any meaning that can be clearly expressed. We would expect a document setting out these issues to be a core component of future approaches to standards assurance and to be used by all higher education providers across the UK. It will remain important for qualifications awarded in the UK to continue to refer to the correct level of the Framework for Qualifications of the European Higher Education Area.

The external examining system

83. The majority of responses to our discussion document were clear that the external examining system is a valued and important part of the UK quality assurance system. It is valued because it provides the critical engagement of external peer academic reviewers with the academic achievement of real students on real programmes. Responses often agreed that 'strengthening' of the external examining system would be beneficial, but there was less consensus about what such strengthening might involve. We have found the research conducted by the Higher Education Academy to be helpful in considering these issues further, and are proposing for consultation to take forward some aspects of its report. Beyond this, it is for the sector to consider how best to address the broader findings.

84. The funding bodies are presently persuaded that it would be beneficial to the sector, and to its stakeholders, to consider further modernisation, or professionalisation, of the external examining system. We believe that further strengthening some aspects of the current arrangements could enhance the role of the external examining system as part of a future quality assessment system, and indeed that this would be highly desirable in its own right. It is important to note that the current quality assessment system does not provide direct assurance about the standard of awards made to students, or their broad comparability, and so the proposals to strengthen the external examining system represent a significant improvement in the assurances available to students and other stakeholders.

85. We are proposing that the training of external examiners should be strengthened. We believe that UK-wide training – separately from, and in addition to, the practical induction arrangements made by individual host institutions – would be useful and we would wish Universities UK, GuildHE and other sector bodies to take the lead in proposing how best this can be done. The focus of the training would be to ensure that external examiners were clear about their role and had the requisite technical assessment skills. They would then be better able to provide reliable judgements about the standards set by institutions and the measurement of student achievement against

these standards, such that standards are maintained over time and are reasonably comparable.

86. The sector has previously discussed and set aside proposals for a register of external examiners, but we presently believe that the reputational benefits for the sector of improved training, and the appointment of external examiners by institutions from those who have undertaken training, now make this a timely and worthwhile improvement to the system. We are seeking clearer assurances for students and other external stakeholders about the integrity of academic output standards, and this would be a relatively straightforward way to improve in this area. We envisage that an external body, and not the funding bodies themselves, would carry responsibility for the training and registering of external examiners.

87. We are mindful that there could be unintended consequences of these proposals, particularly that placing further expectations on individual external examiners might discourage those considering becoming involved in the system, and that it would take a period of time to implement fully. However, we believe that the time commitment for training would not be too onerous and that it would be helpful to consider how online technologies might be used to facilitate this training. The Higher Education Academy research reveals that one of the least well implemented recommendations from the Finch Review is that relating to the recognition of external examining activities within an examiner's home institution. We would also, therefore, want to explore with sector bodies and institutions how these activities might be better recognised.

Question 17: Do you agree that the external examining system should be strengthened in the ways proposed, ie through additional training and the establishment of a register?

Question 18: Do you agree that our proposals in relation to the external examining system are sufficient, ie do they go far enough to provide the necessary assurances about academic output standards to students and other stakeholders?

Communities of peers and the comparability of standards

88. As suggested above, we believe that there is a student and public interest in providing better evidence of the reasonable comparability of academic output standards across the UK, particularly at the pass/fail borderline for all awards but also at the 2i/2ii borderline for classified undergraduate degrees, or equivalent in a GPA system. We note the progress made by the Australian higher education sector in seeking to provide opportunities for examiners to share and develop their views about academic output standards through calibration activities, and are interested in exploring further whether this type of approach would be helpful in the UK sector.

89. We believe that disciplinary communities are the place where shared views of standards are best developed, discussed and tested. However, we are also aware through the discussion of likely future trends that some academic programmes will no

longer sit easily within a single, bounded subject area, but that there will be a much more diverse pattern of applied, inter-disciplinary and multi-disciplinary provision, with academic and professional concerns often co-existing. In this context, the nature of a discipline- or subject-based community is much more fluid, and this suggests that approaches to standards setting will need to be located and understood within a more complex terrain.

90. Nevertheless we propose that it would be helpful to test approaches to establishing, monitoring and maintaining academic output standards. The intention here is not to seek to create common marking criteria for all providers, but rather to establish a simple mechanism to bring together examiners from within a subject community (however best described) to compare their students' work and to judge student achievement against the standards set in order to improve comparability and consistency. We would expect to see this activity result in increased capacity and capability to reach robust judgements about the comparability of standards, particularly at the pass/fail borderline for all awards but also at the 2i/2ii borderline (or GPA equivalent) for classified undergraduate degrees.

91. Models might include:

- disciplines with strong PSRBs, such as Engineering, coalescing around the relevant professional body to explore these issues
- benefits from the development of regional clusters of subject specialists
- subject associations becoming more involved in facilitating such calibration where there are no PSRBs.

92. We would expect such communities of practice to consider whether the current subject benchmark statements provide a helpful and appropriate starting point for this process. We would wish to see the training developed for external examiners draw on and include calibration practices.

Question 19: Do you agree that it would be helpful to explore approaches to the calibration of academic output standards in different disciplinary and multi-disciplinary contexts?

The role of professional, statutory and regulatory bodies

93. We have heard through discussion that PSRBs provide valuable and valued contributions to the development of the curriculum and its delivery, and to the setting and monitoring of standards. PSRBs themselves have expressed a desire to be more closely involved in external quality assessment processes. We have described above possible ways for PSRBs to become the focus for the setting and maintenance of academic standards, through the development of calibration activities. We also believe that the external assurances provided by PSRBs, through their accreditation activities, should be used by a governing body as direct evidence of the appropriate management of standards and quality within a department or subject area. We would expect institutions

to reduce the burden of quality assessment for departments and subject areas by drawing more fully on the activities of PSRBs in confirming that academic standards are secure.

94. We have noted responses to the discussion document that offered a reminder that PSRBs did not all operate in the same way and would not be able to provide identical and consistent assurances on academic output standards. We would wish to explore further the implications of this current diversity in PSRBs, and to work with a range of providers and PSRBs to develop the mechanisms through which institutions, and thereby the quality assessment system, should take assurances from PSRB activity as part of the pilot activity in 2016-17.

Question 20: Do you agree that providers should use the accreditation activities of at least some PSRBs more centrally in future approaches to quality assessment?

Assurances through a provider's governance system

95. We have set out above proposals on the role of internal governance for the student academic experience. We propose that the approach described there should be mirrored in relation to assurances about academic output standards.

96. For each awarding body, we would expect to see engagement at an institutional level with the academic standards set for, and achieved by, its students. The consideration of standards issues should include:

- awards made to all students, including those studying through partnership arrangements, including validation and franchise arrangements, both within the UK and internationally
- analysis of trend data on student academic output standards, at the pass/fail borderline for all awards and also for classified awards, or GPA grades
- confirmation of the appointment of a suitable range of external examiners from those who have undertaken training
- consideration of the reports of external examiners and any necessary follow-up action
- evidence of the involvement of internal markers and external examiners in subject-based calibration activities
- confirmation of the use of guidance on acceptable algorithms for calculating degree or grade classification boundaries (see below) or to confirm why these are not being followed
- the outcomes of external accreditation reviews by PSRBs.

97. On the basis of the expectations set out in the Higher Education Code of Governance we would expect the governing body of an institution with degree awarding

powers to confirm on an annual basis through the annual assurance reporting process operated by the relevant funding body that:

‘the standards of awards for which we are responsible have been appropriately set and maintained, and are reasonably comparable with those awarded to students by other UK degree awarding bodies.’

98. External independent scrutiny of the assurances provided by each governing body would be undertaken by the relevant funding body through its existing institutional assurance mechanisms. The purpose of this external scrutiny would be to check the evidence and process used by the governing body to reach its annual statement on academic output standards – as is done currently for financial management and risk. We would also expect the relevant funding body to develop its own use of data to identify trends in output standards over time for individual providers and to assist the system as a whole in benchmarking.

99. The relevant funding body will publish confirmation that, for each provider, academic standards are set and maintained appropriately and are reasonably comparable.

Question 21: Do you agree with the proposal that we should place more emphasis on the role of the governing body of a provider with degree awarding powers to provide assurances about security and reasonable comparability of the academic output standards of students?

In England

The section on the student academic experience of the proposed operation of the existing HEFCE external accountability mechanisms (paragraphs 56-64) would also apply to the assurances provided by governing bodies in relation to academic output standards.

In Northern Ireland

As for England, the section on the student academic experience of the proposed operation of the existing DEL external accountability mechanisms (paragraphs 56-64) would also apply to the assurances provided by governing bodies in relation to academic output standards.

A note on the degree classification system

100. This consultation does not wish to re-tread the familiar territory of debates about the usefulness or otherwise of the undergraduate degree classification system. We note that the sector achieved a degree of consensus that the classification system was no longer fit for purpose, but that attempts to move forward from this analysis – either through the introduction of the Higher Education Achievement Report (HEAR), or the trialling of GPA approaches – have yet to result in widespread or fundamental reform. In any case, a change from the current classification system, whether to a GPA system or to something else, would not diminish the need to calibrate standards. These proposals

for future approaches to quality assessment do not, therefore, include reform of the classification system, but nor do they preclude it.

101. There is, however, a student interest issue embedded in the cliff-edge effect of the current classification system for undergraduate degrees. The significance for individual students of the different progression opportunities available to those holding a 2i degree compared with those awarded a 2ii degree is important for employment and further study. The proposals made for strengthening the external examining system and the calibration of marking practices will go some way towards providing further confidence about judgements in this area. However, we also believe that it is necessary to acknowledge and address the impact of the wide variety of classification algorithms in use across the higher education system. The research on the external examining system conducted by the Higher Education Academy reveals that 47 per cent of institutions surveyed had made changes to their degree classification algorithms over the past five years to 'ensure that their students were not disadvantaged compared to those in other institutions'.

102. We believe that it would be helpful, through Universities UK and GuildHE, for AHUA to lead a collaborative UK-wide task force to determine a sensible range of possible classification algorithms. We consider that the publication of guidelines for algorithms, particularly relating to the classification of degrees awarded at the pass/fail and the 2i/2ii borderline, would be helpful and would strengthen the international reputation of the sector. This is also an issue on which student representation has been particularly strong through the discussion period.

Question 22: Do you agree with the proposal to develop guidance to providers on a sensible range of degree classification algorithms at the pass/fail and 2i/2ii borderlines?

When things go wrong

Core message

There is a significant student and public interest in identifying, investigating and rapidly resolving any major concerns about the integrity of academic output standards or the quality of the student academic experience. A quality assessment system that adopts a risk-based approach to routine monitoring must have, and be seen to have, 'teeth' where serious problems are identified.

103. The majority of responses to the discussion document confirmed that it would be necessary in future to operate a strengthened system to identify and deal with serious risks to the integrity of academic standards or to the quality of the student academic experience in a particular institution.

104. We propose for consultation that concerns about the integrity of standards, or about the quality of the student academic experience – which may indicate that something serious has gone wrong in a particular provider – could be reported to the

relevant funding body by, for example, external examiners, PSRBs, the Office of the Independent Adjudicator (OIA), the CMA, student representative bodies, or by other stakeholders. This proposal is not intended to interfere with the ongoing work of the OIA in relation to cases brought by individual students, nor the responsibilities of providers to deal appropriately with employment matters. Nor should a provider be denied the normal opportunity to address any shortcoming itself before there is external intervention, provided it acts in a timely and appropriate manner and the legitimate interests of other parties are protected in the meantime.

105. It is important to note that the routine monitoring of student data discussed in earlier sections would ensure that the relevant funding body was able to identify early signs of problems in an individual provider anyway, as does the 'soft intelligence' arising from visits and other frequent contact.

106. We propose for consultation that a future quality assessment mechanism must be designed to ensure that prima facie serious or material issues that have not been successfully addressed in a timely manner by the provider, are investigated rapidly through an external review of that provider. This review would be commissioned by the relevant funding body and undertaken by external peers with an appropriate balance of experience and subject expertise. The review would investigate the prima facie issue in depth and could also re-test the arrangements in the provider under review against the baseline requirements set out for the gateway for entry to the higher education system.

107. To ensure that the quality assessment arrangements are seen as sufficiently credible by students and other stakeholders, the approaches used to investigate concerns will need to be transparent and able to deal effectively with seriously poor practice in a provider. The funding bodies would expect to publish the outcomes of reviews undertaken through this process, together with an account of the action required by a provider to resolve any issues that are found. In the event that suggestions of a serious problem in a provider are confirmed, consequences could include:

- any adverse findings being published
- an action plan being agreed with close monitoring by the relevant funding body
- escalation of interventions as set out in the accountability framework of the relevant funding body, which could lead to a funding consequence for the provider.

Question 23: Do you agree with our proposals to develop and implement a strengthened mechanism to investigate rapidly when there is an indication of serious problems within an individual provider which has not been addressed in a satisfactory and timely manner?

Question 24: Should the mechanism to investigate problems in an individual provider require, in addition to the investigation of the specific issue of concern, the re-testing of the arrangements in the provider under review against the baseline requirements set

out for the gateway for entry to the higher education system?

The broader framework of quality assurance

108. The proposals in the preceding sections on quality assessment for established providers represent the core aspects of our current consultation. Two further necessary components of the overall framework of quality assurance in England, Wales and Northern Ireland are presented here to provide the broader context for our proposals:

- excellence and innovation in learning and teaching
- the gateways into the higher education system.

We envisage that these elements should be complementary components that sit alongside the regulatory quality assessment arrangements for established providers.

In England

Quality assessment arrangements for established providers are the subject of this consultation. This is taking place within a broader framework on which HEFCE is currently working closely with the Department for Business, Innovation and Skills (BIS), which also includes excellence and innovation in learning and teaching; and gateways into and through the higher education system.

The sections that follow provide further information in the first two of these three areas. They are included here to provide England-specific context for the proposals for future approaches to quality assessment. They are necessary components of a broad-based quality system in England, but we envisage that they should be complementary components that sit alongside the regulatory quality assessment arrangements for established providers.

Excellence and innovation in learning and teaching

Core message

The success and reputation of the UK higher education system and of an individual provider is tied to the provision of excellent learning and teaching for students. It is essential that we continue to support the development of approaches to stimulate, recognise and reward world-leading learning and teaching and avoid stifling innovation.

109. We have been prompted by responses to the discussion document to explore the most appropriate approach to securing innovative and excellent learning and teaching at sector level. We are confirmed in our view of the essential importance of further developments in learning and teaching excellence for the future health of our HE system and its world-leading reputation.

110. Responses to the discussion document, and discussion at the series of events, revealed a split in views between those who agreed that a quality assessment system should indeed concern itself centrally with excellence and innovation in learning and teaching, and those who felt that a compliance-based quality assessment system could

never 'incentivise' or 'enable' excellence and innovation in learning and teaching, and should not try to do so. As we have considered these apparently contradictory views we have concluded that there needs to be clarity about the conceptual relationship between 'excellence and innovation' in learning and teaching which describes activities that demonstrate world-leading achievement and progress towards this, and 'continuous improvement' in learning and teaching which we would expect to be undertaken by all providers to ensure that the academic experience of all students is routinely monitored and improved where necessary. While the latter could reasonably be expected to be embedded in a quality assessment regime, it is less clear that this should be the case for the former. For this reason, the current proposals for **quality assessment** do not include a component to provide an absolute star-graded peer assessed judgement of excellence in learning and teaching, as is currently done through the Research Excellence Framework for research performance. That would require development of a significantly different approach in our view, potentially as set out below.

111. We are clear, however, that activities in institutions designed to deliver continuous improvement in learning and teaching should be within the scope of a quality assessment system. They should draw on relevant data to deliver improvement in an institutional context dependent on particular missions, resources and student characteristics. This will provide the following benefits for providers, students and other stakeholders:

- it will ensure that judgements about the quality of the student academic experience are strongly contextualised within the circumstances of an individual provider
- it will form part of the wider work to raise the profile and status of learning and teaching in all providers
- it will ensure that the reasonable expectations of students, and their rights under consumer law, are met by all providers
- it will ensure that both internal and external scrutiny is in place on a regular and frequent basis, rather than on a six-yearly cycle as is currently the case.

112. The Teaching Excellence Framework in England may also draw on similar data to inform independent peer review.

In England

The new Government is going to introduce a Teaching Excellence Framework (TEF) and will work with the sector over the summer to inform a BIS consultation in the autumn. Self-evidently, the new Government's plans for a TEF have not been part of the agenda for discussion at meetings of the Quality Assessment Review Steering Group. BIS and HEFCE are continuing to work together to ensure the quality system in the round provides a strong complementary and proportionate approach. In particular, we have been mindful of the need to ensure that the overall quality system does not introduce duplication, or increase unnecessary bureaucratic burden on providers. In this respect, it should be noted that initial views from the Government are that a cyclical, external, independent, peer review will form a key part of the coming TEF.

In Wales

The success and reputation of the UK higher education system and of an individual provider is tied to the provision of excellent learning and teaching for students. HEFCW believes that effective quality assessment processes should inform quality enhancement. A key vehicle for securing delivery of excellence and innovation is partnership with students.

The Partnership Agreement⁸ for Higher Education in Wales, which has been agreed as part of the Wise Wales⁹ initiative, sets out the expectations of HEFCW, National Union of Students Wales and the HE sector for partnership working in Wales.

All higher education providers in Wales have a student charter and relationship agreement with their student union. HEFCW guidance on these two aspects, updated in the light of our evaluation of these student engagement arrangements¹⁰ can be found on the website.

In Northern Ireland

In Northern Ireland, Graduating to Success – the Higher Education Strategy for Northern Ireland, sets the direction for higher education policy for the period up to 2020 and includes a number of key commitments to enable the sector to deliver on the vision of a vibrant sector which, inter alia, pursues excellence in learning and teaching. One of the strategy's four guiding principles is focused on delivery of a higher quality learning experience, with the quality of the student experience at its heart, and we continue to work with the sector to make progress on the delivery of the agreed Strategy commitments.

Gateway into the higher education system

Core message

Setting, and assessing against, baseline requirements for the quality of provision for those providers wishing to enter the higher education sector, or take on greater levels of responsibility within it, is essential if students are to receive an assured level of academic experience and if the reputation of the sector is to be maintained nationally and internationally.

113. In the discussion document we sought views about the requirements for entry into the higher education system because we wanted to understand the most appropriate relationship between this 'gateway' test of the quality of a provider and the arrangements that might then apply to a provider once established within the system.

⁸ See www.hefcw.ac.uk/documents/policy_areas/learning_and_teaching/Wise_eng2.pdf.

⁹ See www.wisewales.org.uk/.

¹⁰ See www.hefcw.ac.uk/documents/publications/circulars/circulars_2014/W14%2004HE%20Impact%20of%20guidance%20on%20student%20charters%20V2.pdf.

114. A common view was that the ‘threshold bar’ for entry should be set at a level sufficient to ensure that students would receive an appropriately high quality academic experience, that academic output standards would be set appropriately and remain secure, and that the reputation of the system as a whole would be protected.

In England

The current regulatory framework for higher education in England provides statutory powers to HEFCE to assess the quality of education in those providers in receipt of HEFCE funding and in those providers to whom HEFCE is considering providing funding. HEFCE currently has no legal regulatory power of its own in relation to alternative providers seeking to enter the English system through the process for Specific Course Designation, or seeking to progress through the system through the processes for Degree Awarding Powers or University Title, although our views are usually sought. We are currently working closely with BIS to improve the operation of these ‘gateway’ processes for alternative providers and to work towards ensuring one coherent system.

However, HEFCE does hold statutory responsibility for the design and operation of quality assessment arrangements for providers seeking to enter the publicly funded sector in England. In paragraphs 115-116, we are consulting on HEFCE’s approach to the operation of this gateway into the publicly funded sector, and not specifically for the entry and subsequent gateways for alternative providers (which will be the subject of a separate consultation led by BIS).

In Northern Ireland

In Northern Ireland, the entry gateway to higher education is managed by DEL. New providers can gain entry to the regulated higher education system by gaining course designation from the Department or through the processes for gaining Degree Awarding Powers and University Title. Given the extent of cross-border flows, the Department generally requires providers seeking course designation to provide the same assurances around course eligibility, quality, and financial management and governance as are expected in England by BIS. Different criteria for gaining Degree Awarding Powers and University Title are however employed in Northern Ireland, based on the criteria laid out in the 1999 QAA guidance.

115. We have currently concluded that providers will continue to need to meet a set of baseline requirements to enter the sector. We would intend that such baseline requirements for quality be set out and be published and maintained as a common expectation. In the current arrangements for alternative providers in England, the Quality Code fulfils this function. Our expectation for those seeking to enter the publicly funded sector in England and Northern Ireland is that we would develop a simpler expression of the baseline requirement for publication. This would be developed over time to ensure that it remained compliant with Part 1 of Standards and Guidelines for Quality Assurance in the European Higher Education Area.

116. As part of this entry gateway, we would expect detailed scrutiny of a provider's ability to meet the baseline requirements for the quality of the student academic experience to continue to be necessary through an external peer review process. Testing the ability of a provider to give reliable routine assurances about the continuing quality of provision through its governance processes will remain an important element of this scrutiny process. We would expect these arrangements for entry to the system to be designed and operated in such a way as to avoid unnecessary barriers or bureaucracy.

Question 25: Do you agree with the proposal that providers seeking entry to the publicly funded sector in England and Northern Ireland should be tested, through an external peer review scrutiny process, against a set of baseline requirements for quality?

Next steps

117. We are consulting on the proposals in this document until 18 September 2015 (31 August 2015 in Wales) and we welcome responses from any organisation or individual with an interest in quality assessment in higher education. Please respond using the online form, as detailed in Annex A. Events designed to explore our proposals will be held during June, July and September.

118. We will commit to read, record, and analyse the views of every response to this consultation in a consistent manner. For reasons of practicality, a fair and balanced summary of responses rather than the individual responses themselves will inform any decision made. In most cases the merit of the arguments made is likely to be given more weight than the number of times the same point is made. Responses from organisations or representative bodies which have high relevance or interest in the area under review, or are likely to be affected most by the issues raised, are likely to carry more weight than those with little or none.

119. We will publish an analysis of the responses and an explanation of how the responses were considered in our subsequent decision. Where we have not been able to respond to a significant and material issue, we will usually explain the reasons for this.

120. We expect then to undertake a period of more detailed design during which we will work with stakeholders, including students' representatives, to develop the operational detail necessary to implement any new arrangements. We then expect to engage and consult further as appropriate on these operational issues, but will not at that stage consult again on the underlying principles.

121. We expect to conduct pilot activity during 2016-17 and to implement in full any new arrangements from 2017-18.

122. HEFCW will specifically consult further under the express provisions of the Higher Education (Wales) Act 2015 at the appropriate time, informed by the response to this consultation under the 1992 Act.

Question 26: Are there any particular areas of our proposals that you feel we should concentrate on as we undertake a more detailed design phase?

Question 27: Are there proposals not referred to above that you feel we should have in consideration? If so, what are they and what is the rationale for their inclusion?

Question 28: Are there any particular areas pertinent to the devolved nature of higher education in Wales and Northern Ireland that you feel we should have considered further? If so, what are they and what is the rationale for their inclusion?

Annex A: List of consultation questions and related information

Please respond to this consultation by **noon on Friday 18 September 2015** using the online form at www.surveymonkey.com/r/qaconsult. Those responding in relation to the proposals as they would apply in Wales should do so by **noon on Monday 31 August 2015** using the same form.

Freedom of Information Act

Information provided in response to this consultation may be made public, under the terms of the Freedom of Information Act or of an appropriate licence, or through another arrangement.

Such information includes text, data and datasets. The Freedom of Information Act gives a public right of access to any information held by a public authority defined within that legislation. It applies to information provided by individuals and organisations, for example universities and colleges. We can refuse to make such information available only in exceptional circumstances. This means that data and information are unlikely to be treated as confidential except in very particular circumstances.

List of consultation questions

Question 1: Do you agree with our proposed principles to underpin the future approach to quality assessment in established providers?

Question 2: Do you agree that our current proposals for the use of meaningful external scrutiny as set out in paragraphs 32-34 are sufficient? If you do not agree, please indicate what additional or different external scrutiny you propose and provide the reasons for this.

Question 3: Do you agree that future approaches to quality assessment should be based on an assumption that 'one size' can no longer sensibly fit all?

Question 4: Do you agree that there should be a baseline requirement for the quality of the academic experience for students, and that this should be published and maintained?

Question 5: For England, do you agree with the proposal that an individual provider, once it has passed the gateway for entry into the publicly funded system in England, should not be repeatedly externally retested against the baseline requirements for an acceptable student academic experience, unless material evidence suggests otherwise?

Question 6: For Northern Ireland, do you agree that providers should provide annual evidence and assurance that they are meeting the baseline requirements for an acceptable student academic experience?

Question 7: Do you agree that the funding bodies' verification of an institution's review methodology provides a reasonable mechanism through which to operate risk-based scrutiny of a provider's arrangements to secure a good and improving student academic experience and student outcomes?

Question 8: Do you agree that student outcomes data should provide the basis for continuous improvement activities within an individual provider?

Question 9: Do you agree that we should take forward into detailed design and pilot phases further work on the use of student outcomes data to identify patterns and trends and on the development of approaches for monitoring and supporting institutions as they address areas of concern?

Question 10: In Northern Ireland, do you agree with the approach outlined to introduce more effective and consistent arrangements for collecting and analysing feedback from higher education learners?

Question 11: Do you agree with the proposal that more emphasis should be placed on the role of a provider's governing body to provide assurances about the quality of the student academic experience and student outcomes in line with the Higher Education Code of Governance? If you agree, please indicate what, if any, additional support they should receive to provide such assurances.

Question 12: For England, do you agree that, for English institutions, HEFCE should develop and use the existing external accountability mechanisms, particularly the HAR, in the ways described?

Question 13: For Northern Ireland, do you agree that DEL should develop and use the existing accountability mechanisms in the ways described?

Question 14: Do you agree that there should be a 'probationary period' for new entrants to the publicly funded sector in England?

Question 15: Do you agree that international activities should be included in the remit of future quality assessment arrangements as described?

Question 16: Do you agree that a future quality assessment system must provide reliable assurances to students and other stakeholders about the maintenance of academic output standards and their reasonable comparability across the UK higher education system?

Question 17: Do you agree that the external examining system should be strengthened in the ways proposed, ie through additional training and the establishment of a register?

Question 18: Do you agree that our proposals in relation to the external examining system are sufficient, ie do they go far enough to provide the necessary assurances about academic output standards to students and other stakeholders?

Question 19: Do you agree that it would be helpful to explore approaches to the calibration of academic output standards in different disciplinary and multi-disciplinary contexts?

Question 20: Do you agree that providers should use the accreditation activities of at least some PSRBs more centrally in future approaches to quality assessment?

Question 21: Do you agree with the proposal that we should place more emphasis on the role of the governing body of a provider with degree awarding powers to provide assurances about security and reasonable comparability of the academic output standards of students?

Question 22: Do you agree with the proposal to develop guidance to providers on a sensible range of degree classification algorithms at the pass/fail and 2i/2ii borderlines?

Question 23: Do you agree with our proposals to develop and implement a strengthened mechanism to investigate rapidly when there is an indication of serious problems within an individual provider which has not been addressed in a satisfactory and timely manner?

Question 24: Should the mechanism to investigate problems in an individual provider require, in addition to the investigation of the specific issue of concern, the re-testing of the arrangements in the provider under review against the baseline requirements set out for the gateway for entry to the higher education system?

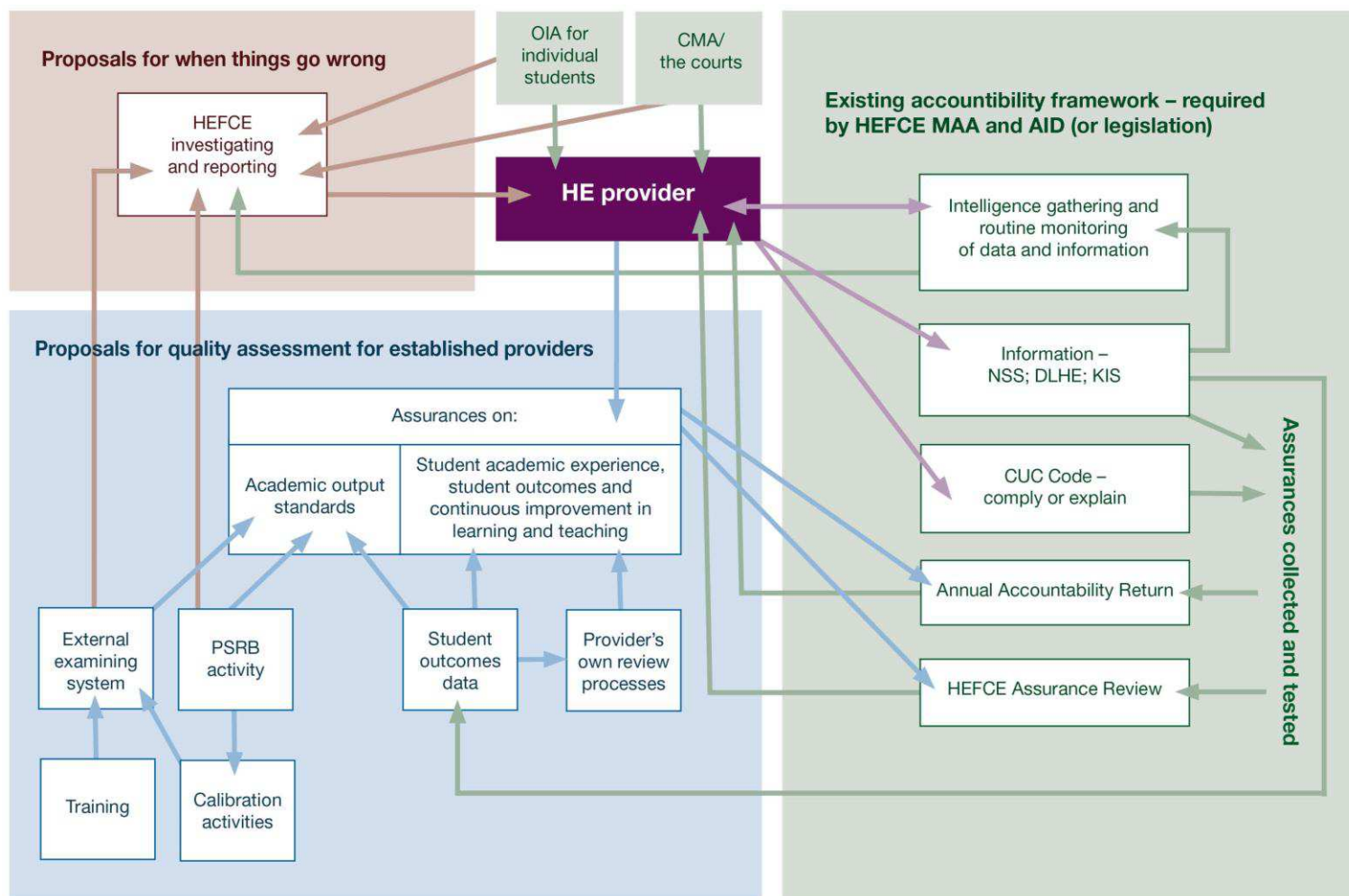
Question 25: Do you agree with the proposal that providers seeking entry to the publicly funded sector in England and Northern Ireland should be tested, through an external peer review scrutiny process, against a set of baseline requirements for quality?

Question 26: Are there any particular areas of our proposals that you feel we should concentrate on as we undertake a more detailed design phase?

Question 27: Are there proposals not referred to above that you feel we should have in consideration? If so, what are they and what is the rationale for their inclusion?

Question 28: Are there any particular areas pertinent to the devolved nature of higher education in Wales and Northern Ireland that you feel we should have considered further? If so, what are they and what is the rationale for their inclusion?

Annex B: The shape of the proposed future arrangements for quality assessment for established providers in England



Annex C: A note on recent legislative changes in Wales

The statutory underpinning for HEFCW's quality assessment responsibilities as set out in the Further and Higher Education Act 1992 (the 1992 Act) will be replaced from 1 September 2015 by a new regime under the Higher Education (Wales) Act 2015¹¹ (the 2015 Act).

The provisions of the 2015 Act will be brought into force in stages by Welsh Ministers.

Within the broader regime change, there are provisions in the 2015 Act that relate to the quality of education provided in Wales by each regulated institution or on behalf of a regulated institution. Education provided outside of Wales is treated as provided in Wales if it is provided as part of a course that is provided principally in Wales.

The 2015 Act provisions relate to regulated institutions (ie those providers which fall within the definition of 'institution' or which have successfully applied to be designated as an 'institution' by Welsh Ministers, and have a current HEFCW-approved fee and access plan in place). From 1 September 2015, all 'institutions' with an existing fee plan will be 'regulated institutions' for the purpose of the 2015 Act and will fall within the new regime.

The 2015 Act considers, in particular, action which HEFCW may take in the event of education of inadequate quality being identified either as a result of its own assessment or review or as a result of assessment or review by another body by arrangement. Under the 2015 Act, the quality of education or of a course of education will be inadequate if it is not adequate to meet the reasonable needs of those receiving the education or undertaking the course.

HEFCW may take action if provision is inadequate or likely to become inadequate. In particular, it may give a direction to the governing body of an institution in relation to improving the quality of the education or course; or preventing the quality of the education or course from becoming inadequate. It may also give advice or assistance to the governing body of the institution with a view to improving the quality of the education or course and preventing the quality of the education or course from becoming inadequate, which the governing body must take into account. The detailed arrangements for this will be set out in a Statement of Intervention, which will be subject to consultation. For the interim period between 1 September 2015 and the full implementation of the 2015 Act, a Transitional Statement of Intervention is currently being prepared and this will be subject to consultation later in 2015.

¹¹ See www.legislation.gov.uk/anaw/2015/1/contents.

List of abbreviations

the Act	Higher Education (Wales) Act 2015
AHUA	Association of Heads of University Administration
AID	Agreement for Institutional Designation
BIS	Department for Business, Innovation and Skills
CMA	Competition and Markets Authority
DEL	Department for Employment and Learning (in Northern Ireland)
DLHE	Destinations of Leavers from Higher Education (survey)
FE	Further education
Funding body or bodies	In this context we are referring to one of the three higher education funding bodies: HEFCE, HEFCW or DEL
GPA	Grade point average
HAR	HEFCE assurance review
HEAR	Higher Education Achievement Report
HE	Higher education
HEFCE	Higher Education Funding Council for England
HEFCW	Higher Education Funding Council for Wales
HEI	Higher education institution
HESA	Higher Education Statistics Agency
MAA	Memorandum of assurance and accountability
NSS	National Student Survey
OIA	Office of the Independent Adjudicator
PSRB	Professional, statutory or regulatory body
QAA	Quality Assurance Agency for Higher Education
TEF	Teaching Excellence Framework