

QAA Response to the Quality Assessment Review



Second Phase Consultation

Introduction

We need a system of quality assurance which is fit for the future, proportionate and flexible, and which protects the interests of students wherever and however they study.

This response presents a summary of QAA's views on the proposals put forward by the funding bodies in England, Northern Ireland and Wales as part of the second consultation phase of the Quality Assessment Review (QAR). It also takes account of the recently published summary of the [roundtable discussions](#)¹ and analysis of the [responses to the phase one consultation](#)² undertaken as part of the review.

The work being led by the Department for Business, Innovation & Skills (BIS) to design a Teaching Excellence Framework (TEF) in England has also shaped our response. In his speech on 1 July 2015, the Minister for Universities and Science, Jo Johnson, stressed the continuing importance of external review by 'an independent quality body from within the existing landscape as part of the TEF'. Since then, there has been clear recognition across the sector of the need to develop future approaches for quality assessment and teaching excellence together. We fully endorse this and underline the importance of identifying excellence effectively, through a system which integrates both quality assurance and the TEF.

Listening to the sector, we have been developing ideas about the shape of the future system. We are sharing these ideas with BIS and sector partners, and would be pleased to engage with others in the sector who are interested in talking to us about them. As a starting point for discussion we have provided an overview of our proposals as an annex (see page 12).

In framing our response we have also taken account of the international expectations for independent quality assurance, and of our knowledge of the UK's competitor systems and key export markets. We have an expert understanding of what makes a good academic experience for students, gained from our work reviewing the whole higher education sector, including alternative providers and further education colleges. QAA review, including annual monitoring visits, has delivered the required rigour for the new entrant end of the quality spectrum.



Much has been said in recent debates about the burden of quality assessment and this undoubtedly needs to be addressed. Designed collaboratively and with the best intentions by HEFCE, QAA and the sector, Higher Education Review has not delivered all that was expected for well managed institutions. The consequences to any provider of failing a QAA review are significant, as are the consequences to QAA of a successful challenge to a review judgement. The pressure within institutions to secure a positive outcome and on reviewers to ensure that judgements are as fair, solid and watertight as possible, has made the review process more complex and at times too mechanistic for institutions with a strong track record.

However, we would echo the views of many consultation respondents in also emphasising the value of quality assessment: through self-reflection; avoidance of future problems; rooting out poor practice; providing confidence to students, employers, the public and government; and the enhancement of the international reputation and export potential of UK higher education. Having worked on a UK-wide basis for almost 20 years, we therefore make a case for maintaining a UK-wide framework and protecting the UK-wide nature of external peer review, which underpin and enhance the reputation of UK higher education.

‘Many stakeholders stressed that a major strength of the UK HE sector consists of having a common framework for HE throughout the UK, with value being placed on the Quality Code as a key reference point. They noted how this was a renowned characteristic of the UK system, which allowed quality assessment of many institutions to be conducted with a consistent approach.’

‘The role of the Quality Assurance Agency (QAA) as the single body for monitoring and advising on standards and quality in the HE sector was considered to be greatly beneficial, and many stakeholders considered its comprehensive nature to give UK a reputational advantage. Several stakeholders also commended the QAA on their close relationships with other international bodies.’

Analysis of responses to phase 1 of the quality assessment review (June 2015)

Principles

QAA agrees with most of the principles proposed in the consultation document, though with some adjustments and additions as follows:

- the recognition that all students deserve an excellent academic experience of learning, teaching and assessment
- co-regulation through a co-owned quality partnership approach, agreed with institutions, funders and students
- the protection and continuation of UK-wide external peer review by an agency independent of government and funding decisions
- institutional autonomy and the responsibility of degree-awarding bodies to manage their own internal quality systems and academic outcomes for students
- the maintenance of a UK-wide and internationally recognised academic infrastructure through the UK Quality Code for Higher Education (UK Quality Code), reformed where necessary
- the effective identification of excellence in learning, teaching and assessment, through integrated quality assurance and Teaching Excellence Framework
- the extension of student engagement in quality assurance and the enhancement of learning and teaching
- maintaining and enhancing the world-leading reputation of UK higher education, underpinned by international respect for its excellent quality assurance
- a single register and 'gateway' for all higher education providers
- a contextualised approach to external review, taking into account an institution's track record and capacity to manage its own standards and quality, and a greater focus on enhancement
- provision of assurance to students, employers, the public and governments
- cost-effective approaches to quality assurance
- rapid and proportionate investigation of concerns when they arise
- the identification of emerging issues and trends, with action taken to promote or halt them as necessary.

Co-regulation and an independent quality body

We agree with the analysis in the Universities UK (UUK) Regulation Task and Finish group [report](#)³ that:

'A good example of co-regulation is the broad framework for quality assurance. As well as discharging statutory requirements on behalf of HEFCE (mainly around quality assessment), the sector works with the QAA to support and develop quality assurance and the academic infrastructure within institutions, recognising that ultimately the standards and quality of higher education rest primarily with autonomous institutions. For example, the Quality Code is wider ranging than any of the funding bodies' statutory responsibilities.'

Co-regulation requires an effective partnership that gives students, providers and funders a say in setting the overall direction of a system that is then operated by an independent body.

Co-regulation is not simply internal institutional responsibility for quality and standards combined with external regulation by the funding body. It requires the direct involvement of providers through partnership, peer review and the independent quality body, in the whole quality assurance framework.

The benefits of this approach are particularly clear in Scotland where an effective partnership exists between the Scottish Funding Council, Universities Scotland, NUS Scotland and QAA Scotland.

This has led to a long-term relationship of trust, stability for providers, and review processes focused on quality enhancement. The sector should aim to consolidate this approach in all parts of the UK.

The future system should also continue to separate the role of assuring quality from the role of funder and regulator. This ensures a coherent, consistent and comprehensive approach that provides assurance and confidence for the public, including students and their parents, the taxpayer, and governments in the UK and internationally. It will also protect independence and avoid conflicts of interests.

This view is shared by a range of experts including the [Higher Education Commission](#)⁴ and in the UUK report mentioned above, which also said:

'There remain valid reasons for the oversight of academic quality to be performed through a separate body... not least given the importance of co-regulation and co-ownership in this area.'

The *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG), in Part 3, also require quality assurance bodies to be independent. QAA has been subject to an [external review](#)⁵ against the ESG which confirmed our independence and full compliance with all elements.

Independent external peer review

We have listened to sector feedback and recognise that the current approach to institutional review needs to change. However, we do not agree with the funding bodies' proposals to replace external peer review with an extension of their own financial accountability frameworks, cited in England as on a five-year cycle. Placing greater reliance on internal governance risks shifting burden rather than reducing it, and could potentially even increase burden during the transition period.

Strong support for external peer review was widely expressed in the phase one consultation. In our view, the reputation of UK higher education, at home and internationally, is enhanced by the system of external review by academics and students. The UK's system of peer review is widely admired and emulated internationally, not least because it reassures providers that judgements are made by those with deep relevant knowledge and understanding of the sector.

An external system operating across the breadth of providers generates knowledge, information and resources that can be disseminated to higher education providers, sharing and improving practice, and helping to identify areas of weakness and risk.

In addition, although their individual reputations may not depend on external review, even the most established and prestigious universities have explained to us how they benefit from it.

External review is a lever for self-reflection and change, and importantly, it provides students with an opportunity to influence strategy, policy and practice.

That said, we acknowledge views within the sector about the extent to which external review adequately drives continuous improvement. To address this, we are proposing a new approach to quality assurance that focuses more on enhancement, drawing upon QAA's experience in Scotland where a robust system of quality enhancement is in operation.

We also believe that the frequency, focus and intensity of external review should change according to the track record of a provider, and that reviews should be less prescriptive and more tailored to the provider. Our proposal therefore outlines methods for enabling this approach.

The ESG states in standards 1.10 and 2.4 that:

'Institutions should undergo external quality assurance in line with the ESG on a cyclical basis'.

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

Institutional autonomy

Degree-awarding bodies have always been responsible for managing their own awards, and this has led to the diverse and flourishing sector we have today.

Quality assurance delivered by an independent body is a key mechanism

for providing public assurance, while protecting institutional autonomy.

Solutions for a TEF should similarly give consideration at every stage to maintaining institutional autonomy and public confidence.

A UK-wide system

While higher education policy is devolved, many universities and colleges operate in more than one of the UK nations. There is also extensive student mobility between nations. A UK-wide quality infrastructure avoids fragmentation and ensures that each nation can trust the quality arrangements in place elsewhere, without need for further assurance. It also ensures that UK higher education is a coherent brand, recognised internationally.

The UK Quality Code includes the Frameworks for Higher Education Qualifications in all countries of the UK, and Subject Benchmark Statements, many of which have recently been redeveloped with considerable professional, academic and employer input.

We agree with the majority of respondents to the phase one consultation that the Quality Code – developed with over 3,000 contributions from the sector – should be maintained. We do, however, accept that the 19 Expectations, which form the heart of the Quality Code, could be more clearly represented with a clearer distinction made between what is mandatory and what are suggestions of good practice.

The Quality Code needs regular review to meet the needs of a dynamic and changing environment.

It must be fit for purpose, and pitched at a level of principle to enable innovation and diversity within institutions and devolved UK nations, allowing approaches to external review that fit national policy priorities.

‘Our assessment of the UK Quality Code has not identified barriers to innovation and to developing new approaches to teaching, such as providing online courses, or night-time learning and blending teaching with more practical aspects of learning.’

An Effective Regulatory Framework for Higher Education, Competition & Markets Authority (March 2015)

Excellence in learning and teaching

High quality student academic experiences and successful student outcomes are shaped by inspirational teaching, and it is entirely right that we should collectively be looking at how best to achieve that excellence.

All students deserve an excellent experience of learning and teaching. A TEF in England provides the opportunity to encourage excellence, while allowing that excellence to take different forms within diverse provider contexts. To enable this, it is important to combine a focus on teaching excellence through the TEF with an approach to quality assurance that ensures a high quality student academic experience across the board.

The UK higher education sector already does much to encourage excellence in teaching. External quality reviews commend excellent approaches to the

management of learning and teaching, make recommendations where there are weaknesses, and work with universities and colleges on improvement and enhancement. The Enhancement-led Institutional Review (ELIR) approach in Scotland includes teaching and learning in its Enhancement Themes, and could provide some pointers for an effective TEF in England. The Higher Education Academy's UK Professional Standards Framework will continue to be indispensable, as will its other work developing the status of teaching in line with that of research. We look forward to working with the HEA, HEFCE and other sector bodies to ensure that those with expertise in any given area lead the relevant part of the new system. We are also ready to collaborate with other UK nations on developments in this area.

Comparability of standards

Assessment is a key part of students' academic experience and central to any attempt to develop greater comparability of degree standards. Staff should be properly and continually trained in this area. The UK Professional Standards Framework may offer a way to strengthen the reliability of assessment and consistency of external examining, as could an increased focus on enhancement with greater use of communities of practice.

The extent to which comparability can and should be demonstrated is not absolute. Therefore, in a system where higher education qualifications are made by autonomous degree-awarding bodies, the role of external examiners is key to ensuring the maintenance and comparability of academic standards. A crucial aspect of their role is to provide assurance that any criteria that differentiate between levels of student achievement above the threshold academic

standards set out in the Framework for Higher Education Qualifications have been consistently applied.

The current review processes consider how providers make use of external examining, including how they respond to the annual reports submitted by external examiners. This offers important evidence of a provider's capacity to manage academic standards. We agree, however, that to provide public assurance that the academic standards achieved by students are broadly comparable across the UK, more work is needed to ensure consistency in calibration. We envisage this would be done through external examiners working within their wider subject communities to assure better comparability of standards

Student engagement

QAA has pioneered student engagement for over a decade, working in partnership across the sector to make meaningful and lasting change. We have encouraged providers to engage with students on their academic experiences, worked closely with students to develop our own work and embedded them in our governance.

Anecdotally, students tell us they never have any greater influence on academic policy in their institution than in the period prior to a QAA review. We believe that there should be multiple ways for students to participate actively in shaping their learning experiences: from direct involvement within

their disciplines; active participation in shaping strategy, policy and governance; and engagement with national policies and initiatives – sparqs (Student Participation in Quality Scotland), Wales Initiative for Student Engagement (Wise Wales) and The Student Engagement Partnership (TSEP) are examples of this.

We will, therefore, actively support proposals to embed student engagement throughout providers, and encourage innovation and development in practice. Later we set out ideas for how students could play an even greater role in a new quality assurance approach.

International reputation

UK higher education is world-leading, as is QAA's reputation for quality assurance. Ambitious targets have been set by BIS for the growth of education exports and to achieve this the UK must continue to have in place a quality system that is credible and trusted internationally.

Helped considerably by the British Council and the Foreign & Commonwealth Office through local embassies, QAA has established 14 cooperation agreements over recent years with counterparts in all of the main countries where the UK delivers transnational education and in our principal competitor countries.

There are currently four major international partnerships and projects (originating in China, United Arab Emirates, the USA

and Europe) looking at standards for cross-border quality assurance. The UK quality assurance framework is considered an exemplar in each of these countries and regions.

UK students and graduates gain competitive advantage from the international comparability of qualifications, enabling those holding UK qualifications to enter professions and employment anywhere in the world.

Recognition of these qualifications is often based on the standing of the relevant assurance or accreditation system. In this way, the international reputation of the UK quality assurance framework helps to underpin student mobility.

A single register and gateway

The current UK quality system does not distinguish between ‘public’ and ‘private’ providers, and moreover these boundaries are not always recognisable or meaningful to students.⁶ Students should be confident that any provider to which they apply offers genuine UK qualifications.

We support a single register for all providers, be they in receipt of funding

body teaching grants, course designation or requiring a licence to recruit overseas students. The gateway to higher education should be rigorous, with an independent quality review against the full UK Quality Code, and a check on financial sustainability, management and governance by an appropriate regulator holding the register in, or on behalf of, each nation.

A contextualised approach to external review

We recognise that review needs to evolve rapidly to live up to changing expectations, which were first articulated to the funding and representative bodies by QAA in 2009 and 2010.^{7,8} Review should be risk-based, proportionate and contextualised, based on a solid understanding of a provider’s capacity to manage its own quality.

For institutions with a proven track record, we believe that external review should be based on a mutually agreed quality enhancement dialogue. For more recent entrants, it should be focused on building capacity to self-assure quality. This would

bring England, Northern Ireland and Wales closer to Scotland’s enhancement-led approach: focused on self-reflection and the enhancement of learning, teaching, assessment and the academic experiences of students.

This could involve more regular ‘light touch’ dialogue and information flow between the independent quality body and institutions, with less focus on the major event of the current review process. It would create the opportunity to pursue cross-institutional and sector-wide enhancement activities, free from a process of judgement.

Student and public assurance

A quality assurance system that fulfils its duty of public assurance, combined (in England) with a TEF to help ensure students get the teaching they deserve, would be a powerful safeguard for students' academic interests.

There is public value in an external review process with published reports (an ESG requirement) confirming that standards are secure, offering an opinion on each provider and a 'state of the nation' commentary on academic quality.

However, we propose a simple and publicly accessible statement also be published annually on each provider, combined with the use of the Quality Mark as a simple public expression that quality is assured. To facilitate this, we think it is worth considering the development of quality profiles for providers, which incorporate analysis of context and metrics relating to both quality assurance and potentially those identified for a TEF.

Cost-effective quality assurance

A more proportionate and targeted approach would offer the potential for savings, in particular for providers which are large but low risk, and therefore currently contribute significantly through their subscriptions to QAA.

We look forward to engaging with the sector to further develop our ideas to streamline regulatory demands, while maintaining the integrity of the quality assurance system. Devising new ways in which regulatory bodies can work together, sharing data and information, will help with this.

Addressing concerns about academic standards and quality

There are existing schemes to address systemic concerns about academic standards and quality. Any individual - whether student, staff, external examiner, or member of the public - can raise an issue with QAA directly through our Concerns Scheme (or through the Scottish Protocol in Scotland).

The Concerns investigations aim to safeguard quality and support improvements. Occasionally, sanctions may be required to protect students' academic interests and preserve the reputation of UK higher education.

Most cases do not reveal significant problems. Where they do, QAA reports publicly and most providers act quickly to resolve them. In future, we recognise that these processes can be refined, streamlined and made more rapid, with better use of metrics to trigger investigations. Future reports will also use clearer and more consistent language in their judgements. We envisage any new approach to quality assurance would use quality profiling and tailored engagement to identify and respond to issues before they become problematic.

Emerging issues and trends

There is potential for more joint working and information-sharing among higher education bodies to identify sector-wide issues, risks and trends.

QAA already shares information with the Office of the Independent Adjudicator and has developed information-sharing agreements with BIS, the Home Office, HEFCE, Estyn and OFQUAL. The importance of this in ensuring that regulation is responsive and rationalised should not be overlooked. There is an opportunity to develop this still further as an integral part of the new system.⁹

QAA has developed and made more robust the ways in which we identify system-wide areas of weakness or risk (as well as strengths), disseminating these back to the sector and stakeholders. Indeed, in the phase one consultation report stakeholders described the value

of publishing good practice and thematic reports as a means of identifying trends or issues relevant to the sector and encouraging enhancement in quality.

It is important to continue strengthening this work, conducting more timely and relevant analyses based on emerging trends and sector needs. In future, themes could be examined across the sector according to identified issues, as is the case in Scotland, informed by the annual activity we propose in our new approach. Or the focus could be on matters of interest to provider groups with similar characteristics and missions. Work of this sort could also support the TEF.

Ways of disseminating good practice are important, and the TEF will no doubt aim to strike a balance between competitive pressures and the sharing and promotion of good practice.



Annex:

An Alternative Approach to the
Quality Assurance of UK Higher Education

Introduction

The Quality Assessment Review currently being carried out by the funding bodies in England, Wales and Northern Ireland, alongside the introduction of a Teaching Excellence Framework (TEF) in England, provides an opportunity to evolve the way in which higher education is quality assured.

Here, we set out an overview of our own proposals, which build on existing strengths, address limitations in the current system and push in new directions. We believe these ideas offer a manageable transition, without the challenge of a major cliff edge to negotiate. They also align more closely with Scotland's ELIR and can accommodate outcomes from the review of the Quality Enhancement Framework in Scotland, maintaining UK-wide cohesion. In developing this approach, we have drawn on expert feedback and insight of colleagues across the sector, extensive research into models adopted in other industries and countries, and the work undertaken by the funding bodies during the first phase of the review.

QAA looks forward to working in partnership with government departments, the funding bodies, the sector and other stakeholders to develop proposals that will ultimately deliver an even higher quality academic experience for students and successful student outcomes across the UK.

Key principles and drivers

We propose an approach that retains important key principles from the current system, namely: co-regulation and shared responsibility, respect for institutional autonomy, external and independent peer review, and student-centredness – while using as drivers for change those areas identified by the sector during the first phase of the Quality Assessment Review. That is, a more risk-based proportionate system that:

- offers public assurance about quality and standards
- reduces the burden on providers
- is more flexible, less formulaic and allows for innovation
- focuses on outcomes and other meaningful metrics as additional indicators of quality.

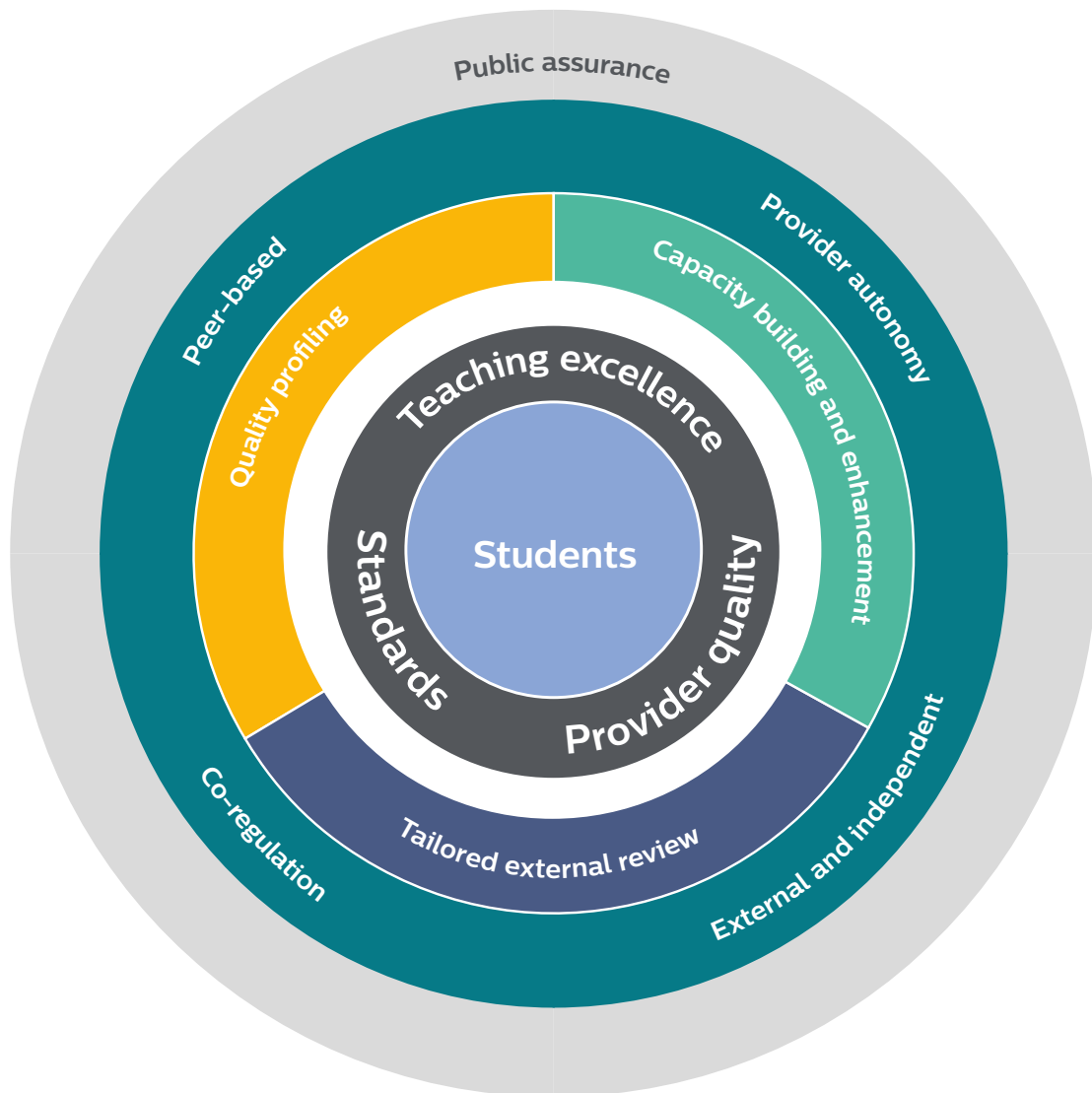
Importantly, our proposed approach can also integrate a specific focus on teaching, learning and assessment, in line with the requirements of the TEF. It will also continue to meet the regulatory requirements for alternative providers.

Changes to the current system

Our proposed approach represents a step change to the existing system. Principally it:

- replaces the fixed review cycle with a risk-based process that tailors the intensity and frequency of external review to each provider
- introduces quality profiling that makes better use of existing quantitative and qualitative data, but places primary responsibility for this monitoring and analysis on an external quality agency
- focuses more explicitly on students' academic experiences, with greater consideration given to student outcomes – both in reaching a judgement about quality and communicating that judgement
- develops enhancement relationships with providers, using peer-to-peer annual dialogue that supports newer entrants with building their capacity to self-assure quality, while facilitating enhancement activity with more established providers.

Figure 1: Key principles and components of the proposed model



Proportionality and use of data

Quality profiling is a desk-based process that would be undertaken by the external quality agency on an ongoing basis. It would:

- draw upon a range of existing data sources, including but not limited to:
 - contextual information from QAA records, published provider annual reports and other available sources
 - track record evidenced through audit and accreditation by QAA, PSRBs and others
 - metrics and outcomes sourced from, for example, HESA, funding bodies, sector agencies, and government departments
- be informed by the introduction of a concise ‘annual advice’ from providers, updating on any significant changes, including their own outcomes analysis (if appropriate), and with brief commentary on how they are managing quality and risks
- be updated against the provider’s annual advice and in dialogue with the provider to form a rich picture of provider quality
- enable the tailoring of future engagement, such as the timing/focus of review
- allow early identification of issues to supplement the existing Concerns Scheme, and trigger intervention and support when and where it is needed
- result in a simple, concise ‘annual opinion’ published by the external quality agency to offer public assurance and information on the provider’s quality. This could also be used by providers in their own materials, and would help to inform student choice.

We recognise the work already undertaken on metrics and the need for transparency, robustness and contextual considerations. We also note that the Department of Employment and Learning in Northern Ireland (DELNI) will be developing outcomes-based approaches in line with key strategic priorities. With this in mind, QAA has also in recent months undertaken detailed work into the use of metrics and welcomes the funding bodies’ proposal to conduct further design and pilot activity.

External and independent review

The new approach would maintain the Quality Code (reshaped and reformed, as appropriate) as the key, shared, external reference point that helps to safeguard standards and protect student interests across the UK, while accommodating different national approaches. Under the new system, there would be:

- a significantly extended cycle for providers with demonstrated quality assurance capacity
- a full review for new entrants with more frequent ‘check-ins’
- tailoring of the review in partnership with the provider on the basis of quality profiling and enhancement activity, to ensure that reviews are progressive in nature, and not an impediment to other activity, overly burdensome or a ‘tick box’ exercise
- increasing engagement with employers
- full published review reports that will continue to satisfy ESG requirements, support improvement and provide assurance externally.

Peer-based

Peers would continue to be drawn from the sector, both nationally and internationally, and be trained and coordinated centrally by an external quality agency, to ensure coherence and efficiency across the system. Under the new approach, peers would:

- conduct reviews
- provide advice and insights on quality profiles and annual opinions
- participate in capacity building and enhancement through 'light-touch' annual engagement.

Enhanced role for students

To maintain and enhance student involvement in quality assuring their academic experience, a new system would:

- continue to use students as an integral part of review, but also include them in new processes such as quality profiling and engagement on enhancement
- include a report from the student body in the provider's annual advice, which would be reflected in the published annual opinion.

Transnational education (TNE)

To ensure that quality assurance contributes to the world-class reputation of UK higher education and offers the UK a competitive advantage, a new system will:

- seek advice on changes to TNE delivery, particularly through partners, in the provider's annual advice
- include TNE activity in quality profiling and take this into account when considering a provider's capacity to self-assure quality.

Sector-wide enhancement and 'state of the nation' reporting

In addition to monitoring and reporting on individual providers, the new system would:

- allow in-depth analysis of data across providers on a themed basis, informing sector-wide enhancement initiatives and reporting back to stakeholders
- offer a platform for sector-wide areas of focus, for example, teaching quality, supporting international students, technology-enabled learning, and fairness in admissions
- enable a wider analysis of trends or systemic risks.

Integrating a Teaching Excellence Framework

We envisage that the same principles – and many of the metrics and contextual information in quality profiles – could be applied in the proposed TEF for England, and allow a development that avoids the creation of two separate assurance systems.

The UK Quality Code provides an existing set of expectations that relate directly to quality in teaching, learning and assessment. Our new approach to quality assurance outlined in this document could include a specific focus on teaching, learning and assessment for English providers. A tailored review could focus on these components of the Quality Code and form part of the TEF.

This is consistent with current approaches across the UK where the external assurance process is tailored to the policy needs of the devolved administrations but underpinned by a UK-wide academic infrastructure. Such a focus would take into account:

- student outcomes – from available data
- qualitative measures – provider-level arrangements demonstrating strategic commitment to teaching excellence and innovation
- institutional context – mission, nature of student body, widening participation characteristics
- learning environment – learning resources, staff characteristics and student feedback.

Conclusion

We believe that the proposed approach will deliver a number of benefits and address concerns about the current model. It will ensure a high core level of quality and standards, coherently applied across England, Wales and Northern Ireland within a wider academic infrastructure that can accommodate different national approaches, as in Scotland. It will introduce a greater focus on student outcomes, and provide useful, accessible information for students and employers. It will free up providers' resources to focus on their core activities, while encouraging enhancement and the sharing of good practice. And finally, it will protect the international reputation of UK higher education.

Features and benefits

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|---------------------------------------|---|
| ▪ Risk-based and proportionate | ▪ Protects international pre-eminence of UK quality assurance of higher education |
| ▪ Tailored and responsive | |
| ▪ Greater focus on outcomes | ▪ Reduces burden and streamlines demands on providers |
| ▪ Supports enhancement and innovation | |

References

- ¹ *Report on roundtable discussions in the first phase of review* (June 2015):
www.hefce.ac.uk/media/HEFCE.2014/Content/Regulation/QA.review/Outcomes_roundtable_events_jan_march15.pdf
- ² *Analysis of responses to phase 1 of the quality assessment review* (June 2015):
www.hefce.ac.uk/media/HEFCE.2014/Content/Regulation/QA.review/2015_futuregainheexsum.pdf
- ³ *Quality, equity, sustainability: the future of higher education regulation - report of the Universities UK Regulation Task and Finish Group* (Feb 2015):
www.universitiesuk.ac.uk/highereducation/Documents/2015/QualityEquitySustainability.pdf
- ⁴ *Regulating Higher Education: A report by the Higher Education Commission* (Oct 2013)
www.policyconnect.org.uk/hef/research/report-regulating-higher-education
- ⁵ *Report of the Panel appointed to undertake a review of the UK Quality Assurance Agency (QAA) for the purposes of renewal of full membership of the European Association for Quality Assurance in Higher Education (ENQA)* (Sept 2013):
www.enqa.eu/wp-content/uploads/2014/01/QAA-review-report-FIN2.pdf
- ⁶ We note that the Higher Education (Wales) Act 2015 sets out requirements for providers that would not otherwise be considered as institutions to have charitable status in order to be eligible for designation.
- ⁷ *Future directions for audit and review in England and Northern Ireland* (January 2009), available at: www.qaa.ac.uk/en/AboutUs/Documents/Future-Directions-2010.pdf
- ⁸ *The changing world of quality assurance* (March 2010), available at:
www.qaa.ac.uk/en/aboutus/documents/the-changing-world-of-quality-and-standards-2010.pdf
- ⁹ The Regulatory Partnership Group, as part of its work looking at changing corporate forms and structures in higher education, recommended arrangements for the sharing of data among its members wherever possible, to enable effective risk assessment of providers of all types.