

**Quality in Higher Education Group (previously known as the Quality Assurance System in HE Group)**

**26 March 2010**

- Attendance :** Professor Philip Jones (Chair)  
Alex Bols, Ros Boyne, Sir Rodney Brooke,  
Prof. Ruth Farwell, Heather Fry, Charlie Leyland,  
Sean Mackney, Prof. Denise McAlister, Anthony McClaran,  
Prof. Ian Robinson, John Selby, Prof. Saul Tendler,  
John Morgan
- Observers:** Bev Thomas (BIS), Celia Hunt (for Dr Cliona O'Neill) (HEFCW)  
Lesley Sutherland (SFC)
- Secretariat:** Fiona Hoban (UUK),  
Helen Bowles (GuildHE), Emma Creasey (HEFCE)
- Apologies :** Prof. Joy Carter, Prof. Janet Beer, Helen Gartley, Prof.  
Matthew Harrison, Joy Mercer, Clive Turner, Prof. Tim Wilson  
(Heather Fry in his stead)

**Chair's Introduction**

1. The Chair welcomed colleagues to the second meeting of the Quality in Higher Education Group, noting that the focus of the meeting would be to agree the recommendations to be put to the Boards of each of the sponsoring bodies (HEFCE, Universities UK and GuildHE) for further consideration and approval following the consultation on future arrangements for quality assurance in England and Northern Ireland.

**Minutes of the meeting held on 25 February 2010 and matters arising**

2. The Minutes of the meeting held on 25 February 2010 had been previously confirmed by correspondence. Likewise the revised Terms of Reference for the Group, as amended following discussion at the last meeting, had been circulated and confirmed by correspondence. This included a change of name to the Quality in Higher Education Group.
3. A query was raised as to whether papers should be regarded as confidential. It was confirmed that, as provided in the Terms of Reference, the Group had agreed to be as transparent as possible. The minutes of the last meeting and the terms of reference as subsequently agreed had been published on a microsite established for the purpose – see <http://www.universitiesuk.ac.uk/PolicyAndResearch/PolicyAreas/QualityAssurance/Pages/HigherEducationGroup.aspx>
4. Links would be established to that website from the websites of the other sponsor bodies so that information about the work of the Group should be readily available. Members were, however, asked to regard the paper setting out the results of the consultation and the draft recommendations to sponsor bodies (Paper QHEG-2010-

05, Agenda item 3) as being not for wider circulation at this stage. The intention was that the outcomes of the consultation and subsequent recommendations should be published in the form of a HEFCE circular in due course. However, given that the recommendations were still under discussion and were subject to consideration and final approval by the Boards of the sponsoring bodies, it would be preferable not to circulate draft versions so as to avoid the risk of potential confusion. Members agreed this approach but asked that, for the future, any papers not for wider circulation be clearly identified as such. (**Action : Secretariat**).

5. It was confirmed that a protocol on sending alternates to attend meetings of the Group had been circulated as requested (Paragraph 21 of the Minutes of the last meeting). [Secretariat Note: To confirm, members who are unable to attend should contact the secretariat if they would like to send a named alternate, so that this can be discussed with the Chair. Members who do not attend or send an alternate may provide comments either in writing or over the phone with a member of the secretariat, so that their views can be fed in.]

**'Future arrangements for quality assurance in England and Northern Ireland' (HEFCE 2009/47): results of consultation and draft recommendations to sponsor body Boards (QHEG-2010-05)**

6. Heather Fry briefly outlined the background to the paper. The two consultation events had been well attended and well received. There had also been a good level of written responses to the consultation, both in terms of the number submitted and the depth of these responses.

7. There were rather fewer written responses from FECs than HEIs, but FECs had been particularly well represented at the consultation events.

8. The number of responses from student bodies was particularly pleasing. Likewise, there had been a good number of responses from Professional, Statutory and Regulatory bodies (PSRBs). The number of responses from employers or their representative bodies was disappointing, particularly given the efforts made to gather responses from that quarter, but perhaps not entirely unexpected given the focus of the consultation. In response to a query it was agreed that the extent to which responses were received from bodies outside England and Northern Ireland would be checked. [Secretariat Note: There was only one response, from a university in Scotland]

9. The numbers of responses falling into each category might be amended slightly as checks were completed to ensure responses were correctly categorised.

10. Fiona Hoban then introduced the consultation findings. In terms of the actual responses, the overall message was that the majority of respondents agreed to the proposals set out in the consultation document. However, it was important to acknowledge that, despite broad agreement with the overarching principles and objectives as set out in the consultation paper, a significant number of respondents expressed reservations about how these might be applied in practice. The relatively high number of respondents who opted for 'Neither agree nor disagree' responses to a number of the questions reflected caution on the part of respondents who felt they needed clearer information on how the proposals might be implemented.

11. The proportion of such responses was particularly high in the case of Question 7 (relating to the proposition that there should be a judgement, rather than a comment

as at present, on the reliance that could reasonably be placed on the accuracy and completeness of the information made available by institutions). Respondents were in no doubt about the need for accuracy in published information but many had reservations about how a relevant dataset could best be defined and monitored for the purposes of making a judgement in institutional audit on its accuracy and completeness. Only 56% of HEIs agreed or strongly agreed to this question.

12. Likewise, although a majority of respondents recognised the case for moving towards more flexibility in a revised audit method, the detail of the responses reflected concerns about the implications. In terms of standards of awards, respondents suggested that a distinction should be drawn between 'threshold standards' - which should be met in all cases, - and comparability of standards more generally. Members of the Group reinforced the importance of this point.

13. Fiona Hoban noted that the Universities UK/GuildHE/QAA Quality Forum had considered the paper in detail at their meeting on 23 March. The very helpful comments made at that meeting, particularly around Q7, were being taken forward into the Group's discussion of the paper.

14. In discussion, members of the Group suggested that, while not pre-empting the role of the QAA in determining the detail of the operational description for the institutional audit process, it would be important to be clear on the recommendations being made to the QAA for further work in this area. It was also important to recognise that institutional audit was not the sole mechanism available for achieving agreed policy objectives, and others (such as the causes for concern procedure or the Academic Infrastructure) could prove more appropriate in particular instances.

15. The model proposed of having a more focussed 'core' for institutional audit, common to all institutions, combined with the scope to include additional topics or themes that might vary from institution to institution or from time to time had been characterised as a 'core plus' model. However, that terminology was not used in the paper as drafted. Members of the Group agreed that they would explore in more detail the proposals for how institutional audit would work at future meetings about both the operational description and the protocol for flexibility. Clearly there was detail which needed to be worked through.

16. They noted the clarification provided in the consultation paper that the flexible element would be determined by the Group according to an agreed and published protocol. The necessity of providing some means of responding appropriately to issues that were identified as being of wider public concern was recognised. However, it was important that it be seen as part of a managed process rather than as a 'knee jerk' reaction to any passing issues raised by the media. There would be timing implications also in considering how best to respond to issues of legitimate concern.

17. The QAA pointed out that in cases where a more immediate exploration of the evidence available was needed, some means other than institutional audit might prove a more appropriate vehicle for gathering evidence and considering what further action was needed. These means might include, for example, the QAA's causes for concern procedure, which potentially worked more quickly and could lead to the expectation of an action plan in the same way as 'no confidence' or 'limited confidence' audit judgements.

18. There should be a clear understanding that the Group as a whole had a part to play in determining the flexible elements of institutional audit, including the extent to

which the choice of additional theme(s) might reflect the individual circumstances of institutions in addition to wider interests. It was agreed that judgements in audit should be determined on the basis of the common core rather than the additional themes. In response to reservations, it was recognised that any concerns identified in respect of the more flexible elements of audit were likely to impact on consideration of core elements.

19. The Group turned to more detailed consideration of the paper and the recommendations put forward. It was noted that the paper had been drafted in the format of a HEFCE Board paper but would need to be put separately for approval to the Universities UK Board, to the HEFCE Board and to the GuildHE Executive Group. However the recommendations would remain the same for all groups.

### **Questions 1 and 2 Principles and objectives for the new quality assurance system**

20. The Group agreed to put the relevant recommendations to the sponsor body Boards (Paragraph 27 of the paper). Members noted it would be for the TQI/NSS Steering Group to consider the findings from the research on public information and subsequent consultation before any final conclusions could be reached on how this might best be addressed through the quality assurance system.

### **Questions 3, 4 and 9 Characteristics of institutional audit**

21. The Group noted changes proposed as noted below.

Para 34a (iii) “how choice of theme will be communicated to the institution” to be replaced with “how theme will be communicated to the institution”

Para 34 b (ii) “how themes will be selected, and whether institutional mission and focus should/ could be taken into account in choosing these” to be replaced with “how themes will be selected, and how institutional mission and focus should/ could be taken into account in choosing these”

22. Subject to these minor amendments, so as better to reflect what was intended, the Group agreed the recommendations should stand.

23. In discussion, the Group asked however that a number of points be taken into account in taking the recommendations forward:

- i) although individual institutions would not have a determining role, it was assumed that care would be taken to ensure that the selection of themes should be relevant to the institution concerned;
- ii) themes would be selected to allow for enhancement as well as for the assurance of quality;
- iii) due regard should be had for proportionality so as to ensure that audit processes did not weigh more heavily on smaller or specialist institutions than on larger;
- iv) given reservations expressed by some members of the Group about the proposal that areas explored as part of thematic areas of inquiry should not be

subject to formal judgement, that the QAA be invited to consider further how any recommendations or areas of concern identified in the course of reviewing themes should be addressed. In addition, the operational description should be clear about the content of the core on which judgements are made.

24. The Group agreed that the flexible element would lead to a comment which would be published, together with recommendations to the HEI. Members wished to clarify whether themes would result in recommendations to the sector and not just to the institution concerned. It was agreed that in some cases it might be appropriate to recommend actions for another body, e.g. the HE Academy.

### **Question 5 Comparability of standards**

25. The Group noted changes proposed in the wording so that the relevant sections of the recommendations read as noted below :

Para 37a “Ensure that the terms ‘standards’ and ‘threshold standards’ are properly defined and are not confused in audit documentation” should be replaced with “Ensure that the terms ‘standards’ and ‘threshold standards’ are properly defined and are not confused in all relevant documentation”.

Para 37b “Consider how comparability of threshold standards might be better addressed” should be replaced with “Consider how institutional audit provides public assurance that threshold standards are being met”. The clause “taking into account the responsibility of institutions for the standards of awards made in their name” should remain.

26. It was noted that the second bullet point in Paragraph 24 (“Greater comparability of threshold standards”) also needed to be revisited. It might more appropriately be expressed in terms of providing public confidence that threshold standards are being maintained.

### **Question 6 Judgement terminology**

27. It was noted that there was a relatively high level of agreement on the part of those responding to the consultation that the QAA should be asked to review the language used to describe the different levels of confidence expressed in audit judgements. However, as the QAA noted at the meeting, it was not easy to decide what might replace the current terminology especially given the stated wish to avoid any wording that might lend itself to use in league tables.

28. It was suggested that there appeared to be an inherent contradiction in the emphasis being placed on avoiding any system which might be used for league tables. Concern about a lack of transparency in the arrangements for assuring quality and standards had been at the heart of some of the earlier debate. Student surveys had also confirmed a strong interest in securing greater transparency in the judgements made in the audit process. This might argue for greater gradation in audit judgements.

29. On the other hand, members argued that any move to more finely graded judgements would impose greater demands on audit teams in terms of the level of training and the evidence base needed so as to ensure consistency of approach thus potentially increasing costs. The HEA expressed the view that it would be preferable to keep to a confidence judgement rather than a score. UUK were also concerned about a possible future link with funding.

30. It was also noted that the judgement terminology currently used for institutional audit in England and Northern Ireland was used in the same way in other parts of the UK. Changes in the language used to describe judgements in England and Northern Ireland might therefore have implications for processes elsewhere.

31. It was confirmed that although respondents to the consultation had expressed a wish to see changes in the judgement terminology, there was no consensus on alternatives and no mandate to move, for example, to a four point judgement. The consultation on the operational description which the QAA was due to conduct in the autumn would provide a further opportunity for stakeholder comment.

32. It was agreed therefore to allow the recommendations to stand as drafted on the understanding that the Group would revisit the issues when the QAA put the draft operational description to the Group for consideration in September.

### **Question 7 Judgement on information published by institutions**

33. As discussed previously, respondents to the consultation had expressed reservations about the proposals put forward, largely, it appeared, because of the level of uncertainty about how it might work in practice. Changes in the wording of recommendations were proposed as noted below:

Para 45 b “QAA should be asked to take these comments and also the outcomes of the public information consultation into account in considering how to operate an audit judgement in this area”

Should be replaced with

“QHE Group, in discussion with QAA, should be asked to take these comments and also the outcomes of the public information consultation [to be held in Autumn 2010] into account in considering how to operate a published judgement in this area”

34. The change in the wording of the recommendation was designed to leave open whether a published judgement on the reliance that could reasonably be placed on the accuracy and completeness of information made available by the institution was best achieved through institutional audit or through some other associated process. Members noted HEFCE's view that it would be important to ensure that, whatever process was adopted, it should be handled in such a way that a judgement of 'no confidence' could trigger, if necessary, the implementation of the agreed HEFCE policy on unsatisfactory quality. The BIS observer also noted that, given that the current method of institutional audit allowed for a 'comment' on published information, it was important not to lose sight of this perspective in the audit process itself. However, it was difficult to reach a final view pending completion of the current work on determining public information needs and the subsequent consultation. Thought needed to be given also to the potential logistical and practical problems in using institutional audit to reach a judgement on the accuracy and completeness of information. It was understood that the approach had been tried in Scotland but not pursued, for reasons relating to the background and experience of auditors, the timing of the judgement and the data, and difficulties related to the sources of the data.

35. In addressing the issues, it was suggested that a distinction might helpfully be drawn between the full range of information that institutions would normally update

and publish annually and the way in which information was used by institutions to define and describe 'the student offer'. Monitoring of the full range of data might be beyond the scope of audit but the way in which data was used by institutions would appropriately fall within the audit process.

36. It was agreed that the wording of the recommendations, as amended, should stand.

### **Question 8 Summaries of institutional audit reports**

37. There was agreement that the use of 'plain English' was desirable for all forms of reporting. Summaries were regarded as useful, but it was also agreed that it would be important for the QAA to explore other models.

### **Revised principles and objectives**

38. The revised principles and objectives to be put to the Boards are attached to these minutes at Annex A. There was some discussion about the extent to which it might be appropriate to reflect more overtly international and global interests and activity. However, it was also noted that from a government perspective, a key objective was to secure accountability in the use of public funds.

### **Quality system in higher education: broader issues**

39. The Chair led a discussion focussing on the wider context for the Group's work in respect of the quality assurance system in England and Northern Ireland. Issues covered in a wide ranging discussion included the need to anticipate future pressures on the system, including financial pressures, the reputation of the sector both within the UK and overseas, the development of the QAA's powers to investigate complaints and the 'Causes for concern' process, the impact of the Browne review on fees and funding and the need for transparency in what was being offered to students.

### **Any other business**

40. The date of the next meeting was confirmed as 16 September 2010.

*Helen Bowles  
Policy Adviser  
GuildHE*

## **Annex A**

### **Revised principles and objectives**

The revised system to assure quality and standards should:

- a. Provide authoritative, publicly accessible information on academic quality and standards in higher education.**
  - i. Provide timely and readily accessible public information, on a consistent and comparable basis, on the quality and standards of the educational provision for which each institution takes responsibility.
  - ii. Report results on a robust, consistent and comparable basis that meets public expectations.
- b. Command public, employer and other stakeholder confidence.**
  - i. Ensure that any provision that falls below national expectations can be detected and the issues speedily addressed.
  - ii. Apply transparent processes and judgements, and function in a rigorous, intelligible, proportionate and responsive way.
  - iii. Assure the threshold standards of awards from HEIs in England and Northern Ireland, wherever and however they are delivered.
  - iv. Explain clearly where responsibilities lie for the quality and standards of provision and how they are secured.
- c. Meet the needs of the funding bodies and of institutions.**
  - i. Enable the funding bodies to discharge their statutory responsibilities to assure the quality of the programmes they fund.
  - ii. Recognise the role of institutions as independent autonomous bodies responsible for their own quality management systems and for the standards of awards made in their name.
  - iii. Enable institutions to discharge their corporate responsibilities, by providing them with information on how well their own internal systems for quality management and setting and maintaining standards are functioning, and identifying areas for improvement.
  - iv. Where relevant, recognise the role of employers as co-deliverers of higher education, taking the quality assurance requirements of such provision into account.
- d. Meet the relevant needs of all students.**
  - i. Have current and prospective students' interests at its heart, underlying all of the other principles.

- ii. Engage students in the quality process, whether at course, institutional or national level.
  - iii. Focus on the enhancement of the students' learning experiences without compromising the accountability element of quality assurance.
- e. Rely on robust evidence-based independent judgement.**
- i. Incorporate external reviews run by an operationally independent body (QAA) and professional, statutory and regulatory bodies.
  - ii. Incorporate evidence from institutions' own internal quality assurance processes, including those which involve external participants.
  - iii. Recognise and support the important role of external examining.
- f. Support a culture of quality enhancement within institutions.**
- i. Apply a process of external review, both by academic peers and by students, rather than inspection by a professional inspectorate.
  - ii. Include processes based on rigorous institutional self-evaluation.
  - iii. Promote quality enhancement in institutions.
  - iv. Enable the dissemination of good practice.
- g. Works effectively and efficiently.**
- i. Operate efficiently, in order to avoid disproportionate use of institutional effort and resources which could otherwise be directed to the delivery of front-line student teaching.
  - ii. Rely on partnership and co-operation between the institutions, the QAA and the funding bodies.
  - iii. Address both quality (appropriate and effective teaching, support, assessment and opportunities for learning provided for students) and standards (levels of achievement that a student has to reach to gain an award) as two distinct but interlinked concepts.
  - iv. Work on the principle of collecting information once to use in many ways.
  - v. Acknowledge that while the quality assurance system applies to England and Northern Ireland only, it is underpinned by reference tools which are UK-wide.
  - vi. Adhere to the Standards and Guidelines for Quality Assurance in the European Higher Education Area (encompassing internal and external quality assurance).
  - vii. Maintain sufficient flexibility and responsiveness to meet changing demands and public priorities in a timely manner.

viii. Complement and avoid duplication with, so far as possible, other assurance processes in HE (for example Ofsted; professional, statutory and regulatory bodies).