Future approaches to quality assessment in England, Wales and Northern Ireland: Analysis of Welsh responses to the consultation

This document presents the results of the analysis of the responses from Wales to ‘Future approaches to quality assessment in England, Wales and Northern Ireland: Consultation’ held earlier this year. The consultation represented the second phase of the Quality Assessment Review initiated by the three higher education funding bodies in England, Wales and Northern Ireland as part of each funding body’s statutory duty for quality assessment in higher education. A summary of all responses from all countries is available on the HEFCE website. The responses from the Wales consultation event are available on our website.

Summary of consultation responses

11 responses were received from: 1 Professional, Statutory or Regulatory Body (PSRB); 1 Sector Representative Body; and 9 Publicly Funded Higher Education Institutions. One response was received late from a student organisation* taking the total to 12.

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

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>2</td>
<td>8</td>
<td>1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Key points

View expressed by 5 or more respondents:
- Not convinced a full argument has been made to move away from the current QAA system;
- Question whether the new approach will deliver a consistent quality assessment process;
- Risk of reputational damage nationally and internationally; and
- Lack of reference to student voice – timing of consultation has not allowed for student engagement.

View expressed less than 5 respondents:
- Ideally carried out by a single provider;
- Will it meet the European Standards and Guidelines for QA;
- New proposals do not align with the CMA guidance and expectations; and
- Needs to take account of the Welsh position in particular the HE (Wales) Act 2015.
- Guidance needs to define ‘meaningful’ student engagement.*
Question 2 – Do you agree that our current proposals for the use of meaningful external scrutiny as set out on pages 9-10 are sufficient? If you do not agree, please indicate what additional or different external scrutiny you propose and provide the reason for this.

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>3</td>
<td>1</td>
<td>5</td>
<td>2</td>
<td></td>
</tr>
</tbody>
</table>

Key points

View expressed by less than 5 respondents:
- The shortcomings of current QAA process do not warrant such a radical change;
- Under current constitutions Governing Bodies (GB) do not have the required expertise to accept this responsibility;
- Additional training will be required for GBs, costly exercise;
- To whom will GBs be accountable – taking account of institutional autonomy;
- PSRBs do not focus on academic standards; and
- Early career academics may not put themselves forward to be external examiners and institutions may not accept them.
- Agree the aims set out in the proposals reduce bureaucracy and focus on meaningful external scrutiny that matters to students and stakeholders.*

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?

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>4</td>
<td>5</td>
<td>1</td>
<td>1</td>
<td></td>
</tr>
</tbody>
</table>

Key Points

View expressed by 5 or more respondents:
- One size does not fit all;

View expressed by less than 5 respondents:
- The current self-regulation and co-regulation quality assurance framework already provides an effective guide to how HEI’s should operate;
- The current quality assessment framework should be maintained;
- Current system provides assurance to both students and stakeholders that a university is adhering to its own responsibilities for quality;
- Clear focus on quality enhancement activities;
- Do not want to move to a risk based system; and
- Welcome a reduction to regulatory cost and burden.
- One size fits all is outdated in Wales.*
**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?**

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>5</td>
<td>6</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Key points**

View expressed by 5 or more respondents:
- Already have the UK Quality Code and this will be instrumental in setting benchmark.
- What constitutes a meaningful baseline? What data could form the baseline? Would need to consult; and
- Currently UK Quality Code is instrumental in setting benchmark.

View expressed by less than 5 respondents:
- QAA brand should not be underestimated – understood and respected nationally and internationally;
- Is there scope to make the current code sharper and more flexible; and
- A baseline would provide assurances to the sector, and assessing new entrants to the sector will inform student choice.

**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?**

Not for Wales

**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?**

Not for Wales

**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?**

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td></td>
<td>6</td>
<td></td>
<td>3</td>
<td>2</td>
</tr>
</tbody>
</table>

**Key points**

View expressed by 5 or more respondents:
- Insufficient information within the consultation to gather a view on how it would operate in practise.
View expressed by less than 5 respondents:
- Risk based approach needs to be considered within the wider context of the HE (Wales) Act 2015
- Agree but there needs to be flexibility and transparency within the funding body*.

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

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>1</td>
<td>6</td>
<td>3</td>
<td>1</td>
<td></td>
</tr>
</tbody>
</table>

Key points

View expressed by 5 or more respondents:
- Step backwards to only rely on outcomes data;
- Draw on qualitative information as well as outcomes data; and
- Risk to smaller institutions with diverse student portfolio that may not have meaningful data due to aggregation.

View expressed by less than 5 respondents:
- Agree should form part of the process as it already is used by individual institutions in their quality assessment processes;
- Students as Partners is the ethos in Wales and is of central importance;
- Future arrangements will need to be robust, reliable and meaningful;
- Raises the question - Is student choice sufficient to drive a quality agenda;
- Cannot be a one size fits all; and
- Agreed UK wide not league table;
- Would want students to have the opportunity to feed in at every opportunity*.

**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?**

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>2</td>
<td>6</td>
<td>3</td>
<td>1</td>
<td></td>
</tr>
</tbody>
</table>

Key points

View expressed by less than 5 respondents:
- Do not want a one size fits all approach – need to consider individuals’ provision and mission;
- Use current metrics to avoid duplication also the work of the Higher Education Data and Information and Improvement Programme (HEDIIP);
- Devolved Governments have differing priorities – eg in Wales, Welsh institutions report on the numbers of students studying through the medium of Welsh;
- Difficult to answer individual questions as do not agree with the package in its entirety;
• Concerns over how the data will be used and comparisons made between the sector; and
• Potentially costly.

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?

Not for Wales

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.

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>1</td>
<td>4</td>
<td>3</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

Key points

View expressed by 5 or more respondents:
• Lead to confusion of roles and responsibilities of Governing Bodies | Senate | Academic Boards - may also be legal implications;
• Current constitution does not allow for this, would require changes to institutional documents; and
• Significant training and possible changes to membership, which in return is costly.

View expressed by less than 5 respondents:
• To be meaningful there needs to be external verification;
• Time constraints of members;
• Role of the GB should include the ability to provide assurances about the quality of student academic experiences and student outcomes*.

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?

Not for Wales

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

Not for Wales

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

Not for Wales
Question 15 - Do you agree that international activities should be included in the remit of future quality assessment arrangements as described?

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>10</td>
<td>6</td>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Key points

View expressed by 5 or more respondents:
- To have international recognition and validity it is essential.

View expressed by less than 5 respondents:
- It will ensure current reputation is maintained;
- Should be able to provide assurance to past students, current and prospective students;
- All delivery locations should be considered to ensure a consistent approach; and
- Student outcome data should be used in the same form as it is applied for home-campus.

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?

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>5</td>
<td>6</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Key points

View expressed by less than 5 respondents:
- Current system works well, what is the rationale for change;
- Fundamental strength of the current system is the UK Quality Code;
- Student expectations evolve over time and universities will be constantly seeking to understand and address differences in perception and expectation, any QA system should recognise the diversity of the student body and engage appropriately;
- Students as partners is key in Wales;
- Risk if academic output is used in isolation as could skew perspectives;
- Need to balance with degree awarding body standards; and
- Should not include strict and standardised set of rules that will restrict innovation, flexibility and academic autonomy.
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?

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>1</td>
<td>4</td>
<td>4</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

Key points

View expressed by 5 or more respondents:
- Welsh specific issues – Welsh language and geographical spread;
- Cost of new training/register – who will cover the cost and would need to take account of training already provided by individual institutions;
- Unintended consequences – could discourage individuals from becoming or remaining an external examiner; and
- Will the register cause issues similar to the ‘Dearing proposals’ that were withdrawn due to the logistics and professional registration.

View expressed by less than 5 respondents:
- Agree current system does require improvement;
- One suggestion – sector wide code of practise based on parts A and B of the Quality Code.
- Providing the system does not put too much stress on the role of the examiner, QAA uses student reviewers important this is maintained*.

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?

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>2</td>
<td>2</td>
<td>5</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

Key points

View expressed by less than 5 respondents:
- Current system needs strengthening; and
- Focused implicitly on undergraduate academic output standards, should apply to all.

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?

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>2</td>
<td>6</td>
<td>2</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

Key points

View expressed by less than 5 respondents:
- Time consuming and expensive – costs and benefits need to be worked through first;
• Would need wide consultation and engagement with PSRB’s, Employers and Students;
• Need to take account of HEI mission and student profile;
• Goes against institutional autonomy; and
• In order to gather a full range need to not only think about standard FTUG degree.

**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?

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>1</td>
<td>5</td>
<td>4</td>
<td>1</td>
<td></td>
</tr>
</tbody>
</table>

**Key points**

View expressed by less than 5 respondents:
- Should not entirely replace an independent body for quality assessment;
- PSRB’s look at professional standards and skill not quality assurance;
- A Governing Body should not consider professional assurance by a PSRB as direct evidence of quality;
- Dependant on scrutiny of PSRB; and
- PSRB’s would need to be quality controlled.

**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?

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>1</td>
<td>4</td>
<td>4</td>
<td>2</td>
<td></td>
</tr>
</tbody>
</table>

**Key points**

View expressed by 5 or more respondents:
- Similar response to that of question 11; and
- Additional training of Governing Body.

View expressed by less than 5 respondents:
- Some institutions already achieve this by providing annual assurances to Senate who then report directly to the Governing Body.

**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?

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>3</td>
<td>1</td>
<td>6</td>
<td>1</td>
<td></td>
</tr>
</tbody>
</table>

**Key points**

View expressed by 5 or more respondents:
• Why are the borderlines pass/fail and 2i/2ii

View expressed by less than 5 respondents:
• If introduced would need to be consistent, evidence based and applied equally;
• Some agreement if there is option to opt out;
• Undermines the universities degree awarding powers; and
• A suitable case for the development of a GPA has not been made.
• Institutions cannot work in silo when it comes to quality and student assessment*.

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?

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>2</td>
<td>6</td>
<td>3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Key points

View expressed by 5 or more respondents:
• More consideration of the document is required as there is insufficient information to comment meaningfully;

View expressed by less than 5 respondents:
• Current QAA Concerns Scheme works well – thorough, proportionate and timely;
• A new mechanism would need to be similarly proportionate and evidence based;
• HEFCW are due to consult on this as part of the HE Wales Act 2015; and
• Support for a more strengthened process.

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?

<table>
<thead>
<tr>
<th>Number of responses</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>1</td>
<td>7</td>
<td>3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Key points

View expressed by less than 5 respondents:
• Appropriate approach if proportionate;
• Many refer to their answer for question 23;

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?

Not for Wales
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?

Key points

View expressed by less than 5 respondents:
- To make an evidence based argument for a substantive change to the current approach;
- Need to hold a meaningful consultation with accreditation bodies;
- Student engagement;
- Make clear the expectations on the Governing Body and external examiners; and
- Who will be responsible for the publication and review of documents arising from the QA process.

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?

Key points

View expressed by 5 or more respondents:
- Student engagement.

View expressed by less than 5 respondents:
- Continue to use the QAA;
- The Welsh context;
- The Scottish approach to QA;
- Enhancement focussed;
- How it will work beyond FTUG programmes; and
- Does not cover masters and research students.

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?

Key points

View expressed by 5 or more respondents:
- Timing difficult due to the HE (Wales) Act 2015, risk that Wales will not play a full and equal part in the development of future approaches due to the timing;

View expressed by less than 5 respondents:
- Feel strongly about a single provider of quality assurance
- Welsh language considerations;
- Student Partnership fully embedded; and
- Additional costs associated with External Examining and enhanced local accountability
Next steps

The Quality Assessment Review Steering Group will consider the outcomes of the consultation across the different countries of the UK, together with the outcomes from the consultation by the Department for Business, Innovation and Skills on ‘Higher education: teaching excellence, social mobility and student choice.’ This proposes that the quality assurance system and teaching excellence framework are coherent and robust. Wales is exploring the possibility of participating in the TEF.