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Circular

Institutional Review: Wales from 2009/10

Date: 19 September 2008
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To: Heads of higher education institutions in Wales
Principals of further education colleges in Wales
Response by: 14 November 2008
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This circular provides a consultation on the core principles, general requirements and key features of the institutional review: Wales (IR) process to be adopted for higher education (HE) in Wales from 2009/10.

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Introduction

1. This circular provides a consultation on core principles, general requirements and key features of the institutional review: Wales (IR) process to be adopted for higher education (HE) in Wales from 2009/10.
2. The IR will form part of the quality assurance (QA) arrangements for Wales and will be a component of a quality enhancement (QE) framework. We will consult on this framework in early 2009.
3. We will hold an event on 21 October 2008 to provide a further opportunity for individual stakeholders to contribute their views to this consultation.

Background

4. The key purpose of the IR is to satisfy the public interest in knowing that HE institutions in Wales provide awards and qualifications of acceptable quality and appropriate academic standard. The process should also maintain comparability of outcomes in Wales with other countries of the UK.
5. The current IR process (2003/04 to 2008/09) was developed by the Quality Assurance Agency for Higher Education (QAA) in partnership with HEFCW and the Higher Education (HE) and Further Education (FE) sectors. It emerged from a context where all subject provision in Wales had been found, through a teaching quality assessment process, to be of at least 'satisfactory' quality, with approximately 36% designated as 'excellent.' The IR addresses the management of the quality of provision and the academic standards of awards which rest with an institution as a whole. Further information is detailed in the Institutional Review: Wales handbook¹.
6. The current IR cycle is coming to an end and therefore we have been considering the process to be used from 2009/10. The new process must enable us to meet our statutory obligation under the Further and Higher Education Act 1992 to secure that provision is made for assessing the quality of education provided in institutions for whose activities we provide, or are considering providing, financial support.
7. Earlier this year we commissioned Nigel Brown Associates (NBA) to evaluate the previous arrangements and inform our approach to quality enhancement. We also established a Quality Working Group (QWG) to advise us on the establishment of new QA and QE arrangements for Wales. This group includes Higher Education Wales (HEW) and institutional representatives, as can be seen in **Annex A**.
8. We have used the outcomes from the QWG, discussions with our Learning and Teaching Committee (LTC), the NBA report, our previous consultation on the current IR cycle², and other documentation to inform our views. The QWG has also advised on the content of this consultation. We invite your views on the proposed core principles, general requirements and key

¹ www.qaa.ac.uk/reviews/reviewWales/handbook/Welsh_handbook_english.pdf

² circular W06/47HE, *Second Consultation on Institutional Review*, http://www.hefcw.ac.uk/Publications/4175_4035.htm [accessed 29 July 2008]

features of the updated IR process. We will consider the outcomes of this consultation, which will inform the QAA in its development of the operational description.

The IR from 2009/10

9. **Annex B** sets out core principles, general requirements and key features which we propose for the next IR process. The proposals are based on the current IR, with modifications to take account of the views of the sector arising from the consultation and considerations described in paragraph 8.
10. **Annex C** details the range of regulated information about quality and standards, which institutions will need to publish, and the wider range of information which will also be available to reviewers as part of the IR.

Principal changes proposed in the IR process from 2009/10

11. The principal changes proposed are highlighted below, with explanation. Each paragraph is cross-referenced to the relevant paragraph of the proposals in **Annex B**. We welcome your views on these proposals.
 - a) An increased emphasis on QE: Quality enhancement is a natural outcome of QA and is thus a natural progression of the current IR process. We consulted on this in Circular W06/47HE, and the majority of responses were favourable to this change, as reported in Circular W07/14HE [paragraph 1(ix), 3(iii)]
 - b) A greater focus on ensuring that students have access to a good quality learning experience: We suggest that this should be a core principle of the IR: learners are at the heart of higher education, and therefore their experience should be central to the IR process. [paragraph 1(v)]
 - c) Compliance with European requirements and guidance: The European Association for QA in HE (ENQA) sets out standards and guidelines for quality assurance in the European higher education area³, including for internal QA within higher education institutions. ENQA also requires member agencies, including the QAA, to have an external review at least once every five years to determine the extent to which they meet the ENQA membership requirements⁴. In order for the QAA to meet the membership requirements, the IR should comply with the standards detailed. [paragraph 1(viii)]
 - d) Use of a rolling process rather than a cycle: This would be a major change to the current arrangements and would enable changes reflecting best practices in the rest of the UK and internationally to be adopted for Wales as desirable. This change is key in enabling Wales to maintain comparability with other countries of the UK,

³ http://www.enqa.eu/files/ESG_v03.pdf [accessed 1 August 2008]

⁴ http://www.enqa.eu/files/review_leaflet.pdf [accessed 29 July 2008].

something highlighted strongly in the consultation process thus far⁵, and in ensuring that the process in Wales remains robust compared to processes used elsewhere. We would consult on any significant changes proposed, and would allow an appropriate period for implementation to ensure that each institution had sufficient time to prepare for its review. We would liaise with the QAA to determine how best to control the process of change over time, and this information would be included in the IR handbook. [paragraph 3(v)]

- e) Risk-based approach: Within a rolling process, we propose that institutions which gained an outcome of limited or no confidence in their previous IR would have no more than four years' interval between IRs. This would be in addition to the normal follow-up procedures for these outcome judgements identified by the QAA. Institutions which had gained outcomes of confidence would have a lighter touch, being reviewed no more than six years after their previous IR. This would provide a more risk-based approach to IR. [paragraph 3(vi)]
- f) Enhancement of the role of the institutional facilitator: In interviews carried out by NBA (see paragraph 7) institutions identified that this role had been very useful, as did our QWG. We would therefore ask the QAA to enhance this role in the revised process. [paragraph 3(vii)]
- g) Commentary on the standards and quality of postgraduate research programmes: We consulted on this in Circular W06/47HE and responses were in favour of this change, as reported in Circular W07/14HE. [paragraph 3(viii)]
- h) Reference to the European and international dimension: The European and international dimension is becoming increasingly important, and it therefore would be appropriate for institutions to identify how their activities and QA processes reflect changes in Europe and internationally. In terms of the European dimension, responses to the Bologna process are of particular note. [paragraph 3(xi)]
- i) Inclusion of an additional student member on the review team: This proposal follows from paragraphs b) and c) above and replicates changes in other parts of the UK. We would expect to take part in common arrangements for student reviewers (eg a shared student reviewer register with other countries of the UK) where appropriate, in order to provide access to a wide pool of students. Those students participating in the IR would receive training on the Welsh context. Welsh HEIs and student bodies would nominate students to such a register, which would need to include some Welsh-speaking students to facilitate requests for bilingual IRs. Students would not participate in the review of their own institution. [paragraph 3(iv), 4(ii)]

⁵ paragraph 8.

- j) Membership on the review team from countries outside the UK, if appropriate: This links with best practice identified by ENQA⁶, and is being adopted by Scotland in its Enhancement-Led Institutional Review process. We would keep this under review. [paragraph 4(iii)]
- k) Judgements to be made on:
 - o the soundness of the institution's present and likely future management of the quality of its programmes;
 - o the soundness of the institution's present and likely future management of the academic standards of its awards:

This splits the current judgement on 'the confidence that can reasonably be placed in the soundness of the institution's present and likely future management of the quality of its programmes and of the academic standards of its awards' into two separate judgements. This change would align the outcome judgements with those currently used in England. We consulted on this in Circular W06/47HE and the majority of responses were in favour of this change. The judgements would be based on current and future risk, and the outcomes would determine the interval between IRs for each institution⁷. [paragraph 3(vi), 9(ii)]
- l) Replacement of the judgement on 'the reliance that can reasonably be placed on the accuracy, integrity, completeness and frankness of the information that an institution publishes about the quality of its programmes and the standards of its awards,' with a comment: We consulted on this in Circular W06/47HE and responses were in favour of this change. [paragraph 3(ix)]
- m) HE in FE: We propose that FE Colleges with directly funded HE provision not covered by other elements of the IR process should be subject to a review. [paragraph 11(i)]
- n) Large or complex collaborative provision to be subject to a separate collaborative provision review (CPR) or enhanced IR: This would provide scope to customise the review of collaborative provision to take account of institutional operations. The definition as to what forms large or complex collaborative provision and the criteria for determining whether a separate review is required would be set out in the IR handbook. [paragraph 11(iii), 11(iv)]
- o) Omission of the enquiry made by the QAA through correspondence with the HEI one year after the IR, on the way in which the HEI responded to the IR report, following similar changes to practice in England. [paragraph 10(iv)]

⁶ *'Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance. Amongst these elements the following are particularly noteworthy:... the use of international experts;'* http://www.enqa.eu/files/ESG_v03.pdf [accessed 29 July 2008]

⁷ detailed in 11(e)

- p) The mid-process review: This should be based on a diversity of perspectives of an institution. Under these proposals, HEIs with a six year interval between IRs would have a mid-process review after three years, while HEIs with a four year interval would have a mid-process review after two years, in addition to the standard QAA procedures for dealing with outcomes of limited or no confidence. [paragraph 10(iii)]
- q) Stronger links between the QAA's annual institutional visits and the IR: The informal visit would integrate IR issues to enable the institution to manage QA and QE more holistically and to provide increased focus to the QAA visits. It may also include involvement of student representatives from the institution, as appropriate [paragraph 10(i)]
- r) A report comprising a) a summary written in a manner accessible to a wide range of audiences, including students, their parents, and employers, and b) a technical annex intended for institutions and those with broader interests in QA and QE: Our consultations suggest that the current report is not particularly accessible to a wide range of stakeholders. Its publication in two parts would mean it could be used more broadly by a wider range of stakeholders, while retaining its usefulness to institutions and experts. [paragraph 12(iii), 12(iv)]

Consultation

- 12. The outcomes of this consultation will inform the specification which we will provide to the QAA in order to inform their development of an operational description (OD) for the new IR process for Wales.
- 13. The QAA will consult on the OD in May 2009. They will use the responses to that consultation in the development of a handbook for the new process, which they will consult on in October 2009. The final version of the handbook will be available in spring 2010.
- 14. As identified in paragraph 3, we will hold a consultation event on 21 October 2008. The first part of this event will enable delegates to contribute to the consultation on the development of the IR to be adopted from 2009/10. The second part of the event will enable delegates to discuss the development of a broader quality enhancement framework for Wales, which will encompass the IR process. This will inform a further consultation in 2009.
- 15. We invite HE institutions, FE institutions with franchise and/or directly funded HE provision, representatives of students and other interested parties to give us their views on this document.
- 16. You may wish to address the following questions in your response:
 - a) What are the advantages and disadvantages of the core principles in **Annex B**?
 - b) What are the advantages and disadvantages of the general requirements in **Annex B**?

- c) What are the advantages and disadvantages of the key features described in **Annex B**?
- d) Are there any other principles, general requirements or key features which you think should be included in **Annex B**?
- e) Is the information detailed in **Annex C** appropriate and complete?
- f) Do you have any other comments on this consultation?

Further information / responses to

17. For further information, contact Dr Cliona O'Neill (tel 029 2068 2283; email cliona.oneill@hefcw.ac.uk).

Annex A

Membership of the Quality Working Group

Members: Dr David Blaney (HEFCW Director of Strategic Development) (Chair)
David McParlin (Aberystwyth University)
Julie Lydon (University of Glamorgan)
Professor Jonathan Osmond (Cardiff University)
Professor Robert Pearce/Jacqui Hare (Higher Education Wales)
Gavin Thomas (Fforwm)
Ben Gray (National Union of Students Wales (NUS))

Observers: Karen Jones/Lisa Newberry (HEW)
Julian Ellis (Quality Assurance Agency for Higher Education)
Gabriel Jezierski (Higher Education Academy)

Officers: Celia Hunt (Head of Strategy, Learning and Funding, HEFCW)
Dr Cliona O'Neill (Senior Learning and Teaching Manager,
HEFCW (Secretary))

Annex B

Core principles

1. The revised IR process is based on the following core principles:
 - (i) As a minimum it must enable HEFCW to meet its statutory obligations to secure that provision is made for assessing the quality of education provided in institutions for whose activities we provide financial support;
 - (ii) It will focus on the responsibility of each institution to secure the quality and standards of its awards;
 - (iii) It will provide robust assurance of the effectiveness of QA and standards mechanisms embedded in HEIs;
 - (iv) The outcomes will make accurate and timely information on the quality of learning opportunities and academic standards available to a wide range of stakeholder groups;
 - (v) The learner experience should be central to the process;
 - (vi) It will be based on the concept of peer review;
 - (vii) It will not disadvantage Wales compared with the rest of the UK, Europe, and internationally;
 - (viii) It will comply with European requirements and guidance, as identified by ENQA¹;
 - (ix) It will provide clear statements and evidence of continuous QE and improvement activities being undertaken within HE in Wales and place into context the extent to which institutions are engaging with QE;
 - (x) It will minimise burden on institutions as far as possible; this includes through the QAA working towards agreeing memoranda of understanding with professional, statutory and regulatory bodies to minimise duplication within, and increase co-ordination of, the separate QA processes;
 - (xi) It will provide an efficient and cost effective process for HEFCW and institutions.

General requirements

2. To deliver these principles, the following general requirements will apply:
 - (i) Continuing commitment by institutions to an external element in QA and QE mechanisms, eg demonstrated in examining, assessment, curriculum design, course and programme validation, feedback processes, and student complaints procedures;
 - (ii) An emphasis on 'proportionality', ie intervention should be in proportion to risk, but we will take firm action where problems are identified;
 - (iii) Comparability of judgements with other parts of the UK;
 - (iv) Recognition of the QA dimension in Wales including, in particular, the requirements of the Welsh Assembly Government.

¹ European Association for Quality Assurance in Higher Education, 2007, Standards and Guidelines for Quality Assurance in the European Higher Education Area Helsinki, 2nd edition, http://www.enqa.eu/files/ESG_v03.pdf [accessed 24 July 2008].

Key features

3. The key features of the IR are set out below. The IR will:
 - (i) assure the quality and standards of all HE provision in Wales², wherever delivered;³
 - (ii) have value to institutions beyond the outcome judgement;
 - (iii) have an increased emphasis on QE, as a natural outcome of QA;
 - (iv) be carried out by a team of reviewers which will visit the institution to assess the soundness of its processes and procedures, and will include a student as a full member of the review team;
 - (v) be a rolling process rather than a cycle, to enable changes reflecting best practices and changes in the rest of the UK, Europe and internationally, to be adopted for Wales as desirable;
 - (vi) have a more risk-based approach, requiring institutions that gained an outcome of limited or no confidence in their previous IR to have no more than four years' interval between IRs, while institutions which gained outcomes of confidence in their previous IR will be reviewed after no more than six years;
 - (vii) retain and enhance the role of the institutional facilitator;
 - (viii) include commentary on the standards and quality of postgraduate research programmes;
 - (ix) include commentary on the reliance that can reasonably be placed on the accuracy, integrity, completeness and frankness of the information that an institution publishes on the quality of its programmes and the standards of its awards;
 - (x) include commentary on how institutions engage with the Credit and Qualifications Framework for Wales (CQFW);
 - (xi) include reference to the European and international dimension (eg how institutions are responding to the Bologna process and European Standards and Guidelines for Quality Assurance in Higher Education, and how institutions' activities and quality assurance reflect changes in Europe and internationally).

4. The review team will:
 - (i) be expected to include at least one member with knowledge and/or expertise of the HE sector in Wales;
 - (ii) include a suitably trained⁴ student reviewer in line with ENQA standards⁵, as an additional member of the review team, selected from students with relevant experience nominated by institutions and/or student bodies;
 - (iii) include membership from countries outside the UK, as appropriate; 'dig down' into institutions' processes through review trails;

² not just HEFCW-funded provision

³ this includes franchise and collaborative provision, including work-based learning

⁴ training will include the Welsh context.

⁵ http://www.enqa.eu/files/ESG_v03.pdf

- (iv) be able to diverge from previously identified areas of discussion to address any emerging or unforeseen areas of concern during its visit, and will conduct more extensive review trails where concerns are identified. This could mean an extension in the length of the visit;
- (v) consider the implementation of the QAA academic infrastructure (benchmark statements, code of practice and programme specifications).

5. Self evaluation Document

- (i) The IR will be based around an institutional self-evaluation document (SED) which will be provided to the review team before its briefing visit;
- (ii) Institutions may use their own format for the SED, which should be kept as brief as possible but should make explicit the quality enhancement intentions of the institution, informed by the self evaluation;
- (iii) Institutions will not be required to submit supporting materials alongside the SED but should expect to provide reviewers with a range of standard institutional documentation upon request during the briefing and review visits. These materials can be made available either in hard copy or electronically.

6. Students

- (i) The IR will include a student member as a full member of the review team;
- (ii) Institutions will need to demonstrate evidence of the range and effectiveness of internal student feedback mechanisms, including student representation, staff/student liaison groups, student feedback questionnaires, and the involvement of students in internal quality review exercise;
- (iii) We will continue to support the national student survey (NSS) to meet the need for robust student information. The NSS will provide part of the evidence for the IR;
- (iv) Student evaluations will continue to form an integral part of the IR;
- (v) We will expect to take part in common arrangements for student reviewers (eg a shared student register with other countries of the UK) where appropriate;
- (vi) Students will be invited to participate in the key stages of the IR in each institution;
- (vii) The representative body (the Students' Union, or equivalent) will have the opportunity to contribute to the pre-review visit;
- (viii) A student submission will continue to be part of the process although, as now, the student body may endorse the institutional SED in place of submitting a separate document. This could be presented in forms other than a written document. The option of the student body endorsing the institutional SED will be set out clearly in the review handbook.

7. Briefing meeting
 - (i) Logistical arrangements, including the identification of themes to be trailed during the IR, will be determined during a pre-review briefing;
 - (ii) The briefing visit will be held at the institution at least four working weeks before the review visit;
 - (iii) As far as possible, information required by review teams for the IR will be detailed at the briefing visit.

8. Publication of information
 - (i) Each institution will need to publish a range of regulated information about quality and standards⁶, which will be verified through the IR;
 - (ii) A wider range of information will also be available to reviewers;
 - (iii) As far as possible, the information will be provided electronically to the review team;
 - (iv) A full list of these sets of information is attached as **Annex C**.

9. Outcome judgements
 - (i) The outcome judgements for Wales will be the same as those used in other countries of the UK - these will be judgements of 'confidence', 'limited confidence' or 'no confidence'
 - (ii) Judgements will be on:
 - o the soundness of the institution's present and likely future management of the quality of its programmes
 - o the soundness of the institution's present and likely future management of the academic standards of its awards
 - (iii) Where a judgement of 'no confidence' is obtained, the institution will need a further review to be initiated no later than twelve months and no earlier than six months following publication of the IR report;
 - (iv) We will consult on an 'unsatisfactory quality' policy for implementation in cases of no confidence judgements where unsatisfactory progress is made.

10. Mid-process
 - (i) The QAA will continue its programme of annual informal visits to institutions, and stronger links will be made between these visits and the IR;
 - (ii) The mid-process review mechanism will continue;
 - (iii) The mid-process review will be based on a diversity of perspectives of an institution;
 - (iv) The QAA will omit the enquiry through correspondence with the HEI one year after the IR on the way in which the institution responded to the IR report.

11. HE in FE
 - (i) FE Colleges with directly funded HE provision not covered by other elements of the IR process, will be subject to a review;

⁶ if not already published elsewhere

- (ii) Franchised HE in FE provision will continue to be reviewed as part of the IR of the HEI partner;
- (iii) Large or complex collaborative provision will be subject to a separate collaborative provision review or enhanced institutional review process;
- (iv) The definition of 'collaborative' provision and the criteria for determining whether a separate review is required will be set out in the IR handbook;
- (v) Wherever delivered, HE provision will be assured through a single mechanism, and remain the responsibility of the awarding HEI.

12. The outcome report

- (i) The QAA will send the institution a letter stating key findings, copied to HEFCW, within a week of the IR;
- (ii) The QAA will publish a report on the findings of the IR;
- (iii) The report will include a summary written to be accessible to a wide range of audiences, including students, their parents, and employers;
- (iv) The report will also include a technical annex intended for institutions and experts in QA and QE.

Annex C

Information requirements in Wales

Part A: information which should be available in all HEIs for review purposes

- 1 Institutional context:
 - Mission statement;
 - Relevant sections of the HEI's corporate plan;
 - Statement of quality assurance policies and processes;
 - Learning and teaching strategy and periodic reviews of progress.

- 2 Student admission, progression and completion:
 - Student qualifications on entry;
 - Range of entrants classified by age, gender, ethnicity, socio-economic background, disability and geographical origin as returned to HESA;
 - Progression and retention data for each year of each course/ programme, differentiating between failure and withdrawal;
 - Data on student completion;
 - Data on qualifications awarded;
 - Data on employment/training outcomes from the Destinations of Leavers from Higher Education (DLHE) longitudinal survey.

- 3 Internal procedures for assuring academic quality and standards:
 - Programme approval, monitoring and review:
 - programme specifications;
 - a statement of the respective roles, responsibilities and authority of different bodies within the HEI involved in programme approval and review;
 - key outcomes of programme approval, and annual monitoring and review processes;
 - periodic internal reports of major programme reviews;
 - reports of periodic internal reviews by departments or faculties;
 - accreditation or monitoring reports by professional, statutory or regulatory bodies.
 - Assessment procedures and outcomes:
 - assessment strategies, processes and procedures;
 - the range and nature of student work;
 - external examiners' reports, analysis of their findings, and the actions taken in response;
 - reports of periodic reviews of the appropriateness of assessment methods used.
 - Student satisfaction, covering the views of students on:
 - arrangements for academic and tutorial guidance, support and supervision;
 - library services and IT support;
 - suitability of accommodation, equipment and facilities for teaching and learning;

- perceptions of the quality of teaching and the range of teaching and learning methods;
 - assessment arrangements;
 - quality of pastoral support.
- Evidence available to teams undertaking HEIs' own internal reviews of quality and standards:
 - the effectiveness of teaching and learning, in relation to programme aims and curriculum content as they evolve over time;
 - the range of teaching methods used;
 - the availability and use of specialist equipment and other resources and materials to support teaching and learning;
 - staff access to professional development to improve teaching performance, including peer observation and mentoring programmes;
 - the use of external benchmarking and other comparators both at home and overseas;
 - the involvement of external peers in the review method, their observations, and the action taken in response.

Part B: information for publication⁷

3 Quantitative data:

- HESA data on student entry qualifications;
- Performance indicators and benchmarks published by the HE funding bodies on progression and successful completion for full-time first degree students (separately for progression after the first year, and for all years of the programme);
- HESA data on class of first degree, by subject area;
- Performance indicators and benchmarks published by the HE funding bodies on DLHE/employment outcomes for full-time first degree students.

4 Qualitative data:

- Feedback from recent graduates, obtained through the National Student Survey (NSS);
- Feedback from current students collected through HEIs' own surveys;
- Summary of the learning and teaching strategy;*
- Summary of links with employers (eg how the institution identifies employer needs and opinions, and how those are used to develop the relevance and richness of learning programmes).*

⁷ This should be published by institutions, if not available elsewhere (eg the Unistats website). Attention is drawn particularly to the items marked *, as these were previously available on the Teaching Quality Information website, but are not published on the Unistats website (www.unistats.com).