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Circular

Recommendations for the Institutional Review: Wales from 2009/10

Date: 6 January 2009
Reference: W09/01HE
To: Heads of higher education institutions in Wales
Principals of directly-funded further education colleges in
Wales
Response by: No response required
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This circular provides recommendations from HEFCW to the Quality Assurance Agency for Higher Education (QAA) regarding the institutional review: Wales from 2009/10, based on the outcomes of the consultation on the Institutional Review: Wales (IR) from 2009.

This document is available online, in large print, Braille, on CD and on audio CD and cassette. Should you or someone you know require this in an alternative format, please contact us on (029) 2068 2280 or email info@hefcw.ac.uk.

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Introduction

1. This circular provides the recommendations from us to the Quality Assurance Agency for Higher Education (QAA) regarding the Institutional Review: Wales (IR) from 2009/10, based on the outcomes of our consultation on this matter¹.

Background

2. The Institutional Review: Wales (IR) needs to enable HEFCW to meet our statutory responsibilities, and to satisfy the public interest in knowing that higher education institutions (HEIs) in Wales provide awards and qualifications of acceptable quality and appropriate academic standard. The current IR procedures are available at http://www.qaa.ac.uk/reviews/reviewWales/handbook/Welsh_handbook_english.pdf.
3. We invited HEIs, further education institutions (FEIs) with franchise and/or directly funded HE provision, representatives of students and other interested parties and stakeholders to give their views on our suggestions for the revised process, detailed in Circular W08/31HE, through events and through the consultation circular.

The Institutional Review: Wales from 2009/10

4. **Annex A** 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 Circular W08/31HE, and the consultation activities described above.
5. **Annex B** 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.
6. **Annex C** provides the outcomes of the consultation detailed in Circular W08/31HE.

Principal changes recommended by HEFCW to the QAA in the IR process from 2009/10

7. The principal changes to the current process that we have recommended to the QAA are highlighted below. Each paragraph is cross-referenced to the relevant paragraph of the proposals in **Annex A**.

¹ Circular W08/31HE http://www.hefcw.ac.uk/Publications/circulars_5489.htm.

- a) An increased emphasis on quality enhancement (QE): QE is a natural outcome of quality assurance (QA) and is thus a natural progression of the current IR process; [para 4 (i)]
- b) A greater focus on the learner experience; [para 2 (v)]
- c) Review team to consider the extent to which the HEI is aware of the European and international dimension; [para 13 (v)]
- d) Use of a rolling process rather than a cycle to enable best practice to be adopted in Wales if appropriate, and in keeping with the distinctive approach to QA and QE in Wales; [para 4 (iii)]
- e) Risk-based approach: We recommend a more risk-based approach to IR, which includes institutions not gaining a judgement of 'confidence' in their previous IR having no more than four years' interval between IRs. Institutions which had gained outcomes of confidence would have a lighter touch, being reviewed no more than six years after their previous IR; [para 3 (ii); para 4(iv)]
- f) Enhancement of the role of the institutional facilitator; [para 4 (v)]
- g) Commentary on the standards and quality of postgraduate research programmes; [para 13 (iv)]
- h) Inclusion of a 'student reviewer' on the review team; [para 4 (ii), 5 (ii), 7 (i)]
- i) Judgements should 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; [para 10 (ii)]
- j) Replacement with a commentary 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'; [para 13 (iv)]
- k) HE in FE: FE Colleges with directly funded HE provision not covered by other elements of the IR process should be subject to a review; [para 12 (i)]
- l) Large or complex collaborative provision should be subject to a separate collaborative provision review (CPR) or enhanced IR; [para 12 (iii)]
- m) 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; [para 11 (iii)]
- n) The mid-process review: This should involve more than one QAA officer; [para 11 (ii)]

- o) Stronger engagement between the QAA and student bodies, if desired by those bodies, through the QAA's annual institutional visits, in order to encourage them to work towards the production of an annual student statement; [para 11 (i)]
- p) The outcome report should comprise a) a summary written in a manner accessible to a wide range of audiences, including students, their parents and employers, and b) a section intended for institutions and those with broader interests in QA and QE [para 13 (ii) and (iii)]

Timetable

- 8. Given the level of detail in Circular W08/31HE, and the fact that the proposals are based on modifications to the current IR, we have asked the QAA to start developing the handbook for the process to be used from 2009/10, rather than developing and consulting on an operational description first. This means that the consultation on the new handbook can be carried out within the current academic year, with the final version in place by the beginning of 2009/10.

Further information / responses to

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

Annex A

Introduction

1. We have invited the QAA to take account of the following recommendations regarding core principles, requirements and key features in developing the IR process to be used from 2009/10. These recommendations are based on advice from our quality working group, Council, and consultation with the sector and other stakeholders.

Core principles

2. We recommend that the revised IR process be based on the core principles below. These are not listed in any particular order. The process should:
 - (i) assure the quality and standards of all HE provision in Wales², wherever and however delivered;³
 - (ii) as a minimum, 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 it provides financial support. It should provide robust assurance of the effectiveness of quality assurance (QA) and standards mechanisms embedded in HEIs, and the outcomes should make accurate and timely information on the quality of learning opportunities and academic standards available to a wide range of stakeholder groups;
 - (iii) provide clear statements and evidence of continuous quality enhancement (QE) and improvement activities being undertaken within HE in Wales and place into context the extent to which institutions engage with QE;
 - (iv) have value to institutions beyond the outcome judgement and focus on the responsibility of each institution to secure the quality and standards of its awards in line with the QAA academic infrastructure;
 - (v) have the learner experience central to the process and be based on the concept of peer review.

General requirements

3. To deliver these principles, we recommend that the following general requirements should apply, listed in no particular order of priority:
 - (i) continuing commitment by institutions to an external element in QA and QE mechanisms, to be defined in the handbook;
 - (ii) an emphasis on 'proportionality', ie intervention should be in proportion to risk, with firm action where problems are identified;
 - (iii) comparability of judgements with other parts of the UK;
 - (iv) recognition of Welsh language requirements, including through the IR visits⁴ and the bilingual production of the final reports;
 - (v) recognition of the priorities of the Welsh Assembly Government;

² not just HEFCW-funded provision

³ this includes franchise and collaborative provision, including work-based learning, and also includes provision for part-time students

⁴ To include optional submission of SED and other materials in the Welsh language, and adequate provision for Welsh-speaking reviewers

- (vi) the QAA should seek to minimise burden on institutions as far as possible. This includes through 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; and sampling documentation;
- (vii) the IR should provide an efficient and cost effective process for HEFCW and institutions;
- (viii) the IR should be consistent with European requirements and guidance, as identified by ENQA⁵ and should benefit Wales compared with the rest of the UK, Europe, and internationally.

Key features

4. The key features of the IR which we recommend to the QAA are set out below. The IR should:
- (i) have an increased emphasis on QE, as a natural outcome of QA. The QAA definition of the QE process should be included in the IR handbook, and should recognise that institutional definitions may differ;
 - (ii) be carried out by a visit from a team of reviewers, including a student, to the institution to assess the soundness of its processes and procedures;
 - (iii) 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 if appropriate, and in keeping with the distinctive approach to QA and QE in Wales. The QAA consultation should identify the decision-making process and timescales for changes to the process, and management and operational procedures;
 - (iv) have a more risk-based approach to intervals between reviews: Institutions which gained an outcome of limited confidence or no confidence in their previous IR should have no more than four years' interval between IRs, in addition to the normal follow-up procedures for these outcome judgements (see paragraph 10 (iii)). The QAA should identify whether intervals shorter than four years might be appropriate, particularly for institutions gaining outcomes of no confidence. Institutions which had gained outcomes of confidence should have a lighter touch, being reviewed no more than six years after their previous IR;
 - (v) retain and enhance the role of the institutional facilitator, to include clarification of the precise purpose of this role and provision of training for holders of this post, including those located in FEIs.

⁵ 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].

5. The review team should:
 - (i) include at least one member with knowledge and/or expertise of the HE sector in Wales, and include Welsh-speaking members if requested by the HEI being reviewed;
 - (ii) include a suitably trained⁶ student reviewer as an additional member of the review team;
 - (iii) follow thematic trails to consider how the institution's quality assurance procedures and mechanisms operate;
 - (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 potentially mean an extension in the length of the visit;
 - (v) consider the implementation of the QAA academic infrastructure (benchmark statements; framework for higher education qualifications in England, Wales and Northern Ireland; code of practice; and programme specifications).

6. Self evaluation Document
 - (i) the IR should be based around an institutional self-evaluation document (SED), to be provided to the review team before its briefing visit;
 - (ii) the QAA should consider whether institutions might use their own format for the SED, with guidance provided to help institutions ensure that their SED contains all the expected information. We recommend that the guidance should request that the SED should identify evidence supporting the strategies put in place to enhance the quality of the student learning experience, and make explicit the quality enhancement intentions of the institution;
 - (iii) institutions should not 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. Institutions should be able to submit these either in hard copy or electronically.

7. Students
 - (i) a student should be included as a full member of the review team; we would expect to take part in common arrangements for student reviewers where appropriate, to provide access to a wide pool of students. Students should have appropriate training, and nomination procedures and criteria will need to be identified. Welsh-speaking student reviewers should be available to facilitate requests for bilingual IRs;
 - (ii) institutions should demonstrate evidence of the range and effectiveness of internal student feedback mechanisms, including student representation, staff/student liaison groups, student feedback

⁶ training will include the Welsh context.

- questionnaires, and the involvement of students in internal quality review exercises;
- (iii) the national student survey (NSS) should continue to provide part of the evidence for the IR. We will regularly review our funding of the NSS and the robustness of the student feedback provided through it;
 - (iv) the student representative body should be invited to contribute to the preliminary visit and students should be invited to participate in their institution's IR visit;
 - (v) a student submission on the student learning experience should continue to be part of the process. The submission should be permissible in forms other than a written document. The option of the student body endorsing the institutional SED should be clearly described in the IR handbook.
8. Briefing meeting
- (i) the briefing visit should be held at the institution at least four working weeks before the review visit;
 - (ii) logistical arrangements, including the identification of themes to be trailed during the IR, should ideally be determined during the briefing visit⁷;
 - (iii) as far as possible, information required by review teams for the IR should be detailed at the briefing visit.
9. Publication of information
- (i) each institution will need to publish a range of regulated information about quality and standards⁸, which should be verified through the IR;
 - (ii) a wider range of information should also be available to reviewers;
 - (iii) as far as possible, the information should be provided electronically to the review team;
 - (iv) a full list of these sets of information is attached as **Annex B**.
10. Outcome judgements
- (i) the outcome judgements for Wales should 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 should 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 should undertake a further review to be initiated no later than twelve months and no earlier than six months following publication of the IR report;

⁷ Although, as identified in 5(iv) the review team may 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.

⁸ if not already published elsewhere

- (iv) HEFCW and the QAA should agree an 'unsatisfactory quality' policy for implementation in cases of no confidence judgements where unsatisfactory progress is made;
- (v) the QAA should send the institution a letter stating key findings, copied to HEFCW, within a week of the IR.

11. Mid-process

- (i) the QAA should continue its programme of annual informal visits to institutions, including stronger engagement with student bodies if desired by those bodies to encourage them to work towards the production of an annual student statement;
- (ii) the mid-process review mechanism should continue, and should involve more than one QAA officer;
- (iii) the QAA should 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.

12. HE in FE

- (i) FEIs with directly funded HE provision not covered by other elements of the IR process should be subject to a review;
- (ii) normally, franchised HE in FE provision should continue to be reviewed as part of the IR of the HEI partner;
- (iii) large or complex collaborative provision should be subject to a separate collaborative provision review or enhanced IR process;
- (iv) the definition of 'collaborative' provision and the criteria for determining whether a separate review is required should be set out in the IR handbook.

13. The outcome report should

- (i) be published in both English and Welsh on the QAA website;
- (ii) include a summary written to be accessible to a wide range of audiences, including students, their parents, and employers;
- (iii) include a section intended for institutions and experts in QA and QE;
- (iv) include commentaries on:
 - o QE including evidence of continuous QE, improvement activities being undertaken, and the extent to which the institutions engages with QE, to enable best practice to be more easily identified and shared within the UK HE sector;
 - o the standards and quality of postgraduate research programmes; and
 - o the reliance that can reasonably be placed on the accuracy, integrity, completeness and frankness of the information that the institution publishes on the quality of its programmes and standards of its awards;
- (v) include reference to the principal areas covered by the IR; the ways in which institutions engage with the Credit and Qualifications Framework for Wales (CQFW); and the European and international dimension (eg how institutions are responding to the Bologna

process and how institutions' activities and quality assurance reflect changes in Europe and internationally).

Annex B

Information requirements in Wales

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

- 1 Institutional context:
 - Mission statement;
 - Sections of the HEI's corporate plan which relate to the Institutional Review: Wales (IR) and the quality processes and procedures in place in the institution;
 - Statement of quality assurance policies and processes;
 - Learning and teaching strategy and periodic reviews of progress of that strategy since the previous IR.

- 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 since the previous IR;
 - reports of periodic internal reviews by departments or faculties since the previous IR;
 - 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, for both academic and non-academic areas;
 - the involvement of external peers in the review method, their observations, and the action taken in response.

Part B: information for publication⁹

- 4 Quantitative data (some of which is published on the Unistats website (www.unistats.com)):
- 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.
- 5 Qualitative data:
- Feedback from final year students, obtained through the National Student Survey (NSS);

⁹ This should be published by institutions, if not available elsewhere (eg the Unistats website (www.unistats.com)). 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.

- 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).*

Annex C

Outcome of consultation on Institutional Review: Wales from 2009/10, Circular W08/31HE.

Introduction

1. Circular W08/31HE, 'Institutional Review: Wales from 2009/10' was issued to consult the sector on proposals for the next institutional review (IR). This document provides the outcomes of that consultation.

Background

2. We invited higher education (HE) institutions, further education (FE) institutions with franchise and/or directly funded HE provision, representatives of students and other interested parties and stakeholders to give their views on the consultation.
3. We held a consultation event on 21 October 2008, and attended an event held by the Quality Assurance Agency for Higher Education (QAA) and National Union of Students (NUS) to gain the views of representatives of students.

Responses

4. Fifteen responses were received to this consultation, of which eight were from HEIs and the remainder from external organisations. The full list of respondents is available at **Annex D**. We are very grateful to all respondents for their contributions to this consultation.
5. Responses to the consultation were broadly in favour of the changes proposed. Broad agreement was received for the change in judgements to align with those in England, and maintenance of terminology of outcome judgements to align with the other countries of the UK. The principal suggestions are detailed in the sections below.
6. A range of other points were raised which are not reported here due to the small numbers of respondents identifying these issues. However, these have been considered in the development of our recommendations.

Student feedback

7. Most of the feedback gained from students is integrated with the other responses below. However, students had a distinctive view regarding what should be covered in the IR process, which is discussed here separately. Their view was that the following should be covered in the IR process:
 - Accuracy of information;
 - The institution's approach to feedback and assessment;
 - Effectiveness of the method(s) of ensuring that the student voice is heard in the HEI, including how the HEI works with student representatives and the students' union (SU);

- Procedures in place to check quality of delivery (how many planned lectures actually take place, how good is the lecturing, whether the methodology (including learning styles) is appropriate, comparability of degrees and awards across institutions and across the sector as a whole);
- The general context of the HEI;
- Parity of experience (between subjects, collaborative partners, work based learning, and across the sector);
- Student support arrangements, including informal support;
- The way in which relationships across institutions are nurtured;
- The ways in which good and effective practice are recognised and shared.

Student involvement/reviewers (7 institutional responses, 2 organisational response; event responses)

8. Responses broadly favoured including a student as a full member of the review team. Students thought that it would raise the profile of the NUS, give students a better understanding of quality processes, and help to break down language barriers between academics and students. Inclusion of a student member on the review team would also recognise the greater focus on ensuring that students have access to a good quality learning experience. Student involvement in the IR process also aligned with Estyn's plans for the inspection process from 2010.
9. There was some uncertainty surrounding this role of student reviewers, including the capacity of students to commit to this role and the criteria for selection of student reviewers. They would need to have substantial experience of quality processes and thorough training and briefing were essential. In the case of HE in FE it would be helpful if the student reviewer has experience of the FE sector. Sabbatical officers have appropriate experience and fewer time constraints than undergraduate students to participate as review team members. Reviewers could be nominated by HEIs and student representative bodies.
10. The SUs should be supported by the QAA to enhance their engagement with the IR. This could include providing timelines for the IR, and guidelines on identifying evidence for the student submission, including the use of blogs or discussion pages to gather students' views, and how the submission would be used in the IR. The SUs could be allocated a contact at the QAA to approach for advice. The institutional facilitator could also play a role in supporting the SU. A video could be prepared by the QAA and/or NUS explaining the review process to students. This would make it easier to disseminate through media such as online networking sites and the NUS website. Blogs and podcasts could also be used. IR meetings with students could be held in informal settings, such as seminar rooms, or have an informal format, such as student-led focus groups, in order to put students at ease.
11. Other points raised included the following:

- The turnover of SU staff means that issues arising between reviews may not be identified in the student submission for the IR. It would therefore be useful to have engagement between the QAA and students' unions in between reviews;
- Students should be asked for feedback on their participation in the IR process;
- The language of the review reports should be accessible to students;
- The QAA should work with the NUS and the local SU to share the outcomes of the IR;
- There was a request for a more prescriptive approach, with the stages in which students would participate being defined in the handbook, and clarification on whether or not students should contribute to the pre-review visit.

Rolling process (8 institutional response, 2 organisational, consultation event)

12. There was broad support for the proposal to move away from a fixed cycle of review to a rolling programme, in order to provide greater flexibility to adapt the process as circumstances change, and to facilitate enhancement.
13. Some respondents perceived that if an institution was managing quality and standards effectively, it should be able to adapt to a change in the system, given sufficient lead-in time and clarification.
14. Some responses welcomed the rolling process as a means of ensuring comparability with other countries of the UK, although it was also identified that maintaining flexibility to keep pace with the English system was an inappropriate reason to adopt a rolling process.
15. Some additional concerns were raised, as follows:
 - alterations to the process could incur additional costs, including consulting and briefing institutions and a robust programme of training/retraining of reviewers, SUs and institutional facilitators;
 - the decision making process and timescales for change to the process needed to be clarified, with a lead-in time that did not place additional burden on institutions;
 - it was important to clarify the management of the process, and to ensure that it was underpinned by sound operational procedures underpin it to ensure that timings and expectations were clearly stated;
 - the rolling programme could lead to disjointedness when looking at reports across the sector, as the content might vary considerably unless the reviews strictly adhered to guidance regarding the introduction of new themes;
 - there would need to be measures to ensure comparability of reviews across a normal cycle period.

Institutional facilitator (8 HEIs, 3 organisations/groups, consultation workshops)

16. Respondents welcomed the enhancement of the role of the institutional facilitator to improve communications and information management between the HEI and the review team, and recognised that the role of facilitator has been positive in the IR to date, including in reviews of HE in FE. Additional points raised include the following:
 - It would be useful to refine the role and clarify its purpose;
 - Training for the holders of this role is key;
 - This was a way in which Wales was unique and could lead the way. The use of an institutional facilitator is comparable with proposed changes to the Estyn inspection from 2010 onwards, which will include a 'nominee.'

Risk-based approach (three HEIs; 3 organisations/groups, consultation workshops)

17. Responses were in favour of a risk based approach, and the benefits for institutions which had met expectations in terms of quality processes and procedures.
18. It would be necessary for the QAA to consider whether a mid-cycle review would be appropriate, depending on the timescale of engagements post-review for those institutions with limited or no confidence judgements.
19. Respondents queried whether four years was an appropriate interval between IRs for institutions with limited or no confidence outcomes, in addition to the normal follow-up procedures detailed in the IR handbook, and whether a shorter timeframe would be better, particularly in cases of no confidence judgements, in order to benefit the reputation of the Welsh sector as a whole.
20. It would be necessary to engage in greater dialogue where there were shorter intervals between reviews.
21. It was suggested that where institutions merge, there could be a review after two years, to ensure that the students' learning experience has not been compromised by this activity.
22. The approach of activity being more proportionate to risk fitted well with Estyn's proposed approach from 2010.

Stronger links between annual visits and the IR: (5 HEI, 2 orgs/groups, consultation workshops).

23. There were mixed views on forming stronger links between annual visits and the IR, as three respondents agreed with this, and the remainder expressed reservations. Those agreeing considered it made the best use of QAA staff time, and there was also a request that this should also apply to HE in FE. The annual visits might provide the opportunity to involve student bodies in quality on an annual basis, eg by encouraging them to collate current issues

and submit them to the QAA before the annual visit. This would eventually inform the student submission, and enhance its value.

24. Two responses requested further clarification, as if the visit was not managed appropriately it could be detrimental to the relationship between HEIs and the QAA, as institutions might be more circumspect about discussions at the meetings, and a more formal link with the IR might also increase the burden on HEIs.

HE in FE (3 HEIs, 3 organisations, consultation workshops)

25. Responses regarding the inclusion of HE in FE provision in the IR were supported. A range of issues were identified, as follows.
 - all HE delivered by an FE institution should be covered in reviews of directly funded HE in FE provision, to provide a more holistic assessment of HE practice, as separation of the provision carried a risk of giving more status to some HE provision than others, is regarded by FEIs as being potentially divisive, and the focus on directly funded provision does not sufficiently recognise the contribution of FEIs to the higher skills needs of the workforce in Wales;
 - a more holistic view should be taken of HE in FE provision, to encompass the appropriateness and effectiveness of learning opportunities for part-time HE students;
 - there was support for directly funded HE provision not covered by the other elements of the IR process being subject to a review;
 - FE perceived FE to be a 'bolt on' to HEI quality assurance systems, and that the FEIs rarely receive information regarding external examiner reports and actions and the performance of HEI learners compared to FEI learners. A separate review would enable FEIs to obtain this information and use it in management and development of the quality of their HE provision, in conjunction with the HEI;
 - the review could be tailored to the form of HE being delivered by the FEI as, for example, most FEIs deliver provision designed by the HEI and therefore have no control over whether the design of the provision meets academic standards, but do have control over the management of academic standards;
 - training should be provided, perhaps through Fforwm, to facilitate FEIs' understanding of how the IR works and how it is similar to/differs from the Estyn structure;
 - a satisfactory definition of what is 'large or complex' collaborative provision should be provided, to enable institutions to understand what provision might be subject to a separate review;
 - collaborative provision should not be examined separately;
 - directly funded HE in FE provision should be subject to the same methodology as HEIs;
 - all University provision should be included in the IR;

- whether the decision to review collaborative provision separately would be taken in the context of the outcomes of previous reviews of collaborative provision.

Mid process review (2 HEI, 2 org, consultation workshops)

26. Respondents identified the following:

- It was important for the QAA to be informed of developments in the intervening years;
- There was support for the current mid-process review mechanism, operating without a visit.

CQFW (2 HEIs, one organisation)

27. Respondents identified the following:

- there should be greater explicit reporting on the impact of credit on learners, the use of credit transfer and accumulation, accreditation of prior learning credit use, consistency of credit approaches, links to credit and funding, and the benefits of credit to learners, which would generate evidence of the benefits of use of credit in Wales;
- the CQFW and FHEQ should be included in the consideration of the implementation of the academic infrastructure (4 v).

Burden (6 HEIs)

28. Institutions welcomed the principles of minimising the burden on institutions and providing an efficient and cost effective process for HEFCW and institutions. It was queried how the minimised burden and cost effectiveness would be achieved. The QAA was encouraged to agree memoranda of understanding with professional bodies.

Quality enhancement (8 HEIs, 3 organisations, consultation workshop)

29. There were mixed views on whether or not a definition of enhancement should be included. Some respondents thought that it would be useful to provide a definition in the handbook to address how it was defined in the context of the IR. It was observed that the absence of a definition also resulted in the absence of a discussion regarding how enhancement might be measured. However, others thought that institutions should be able to develop their own definition of enhancement in alignment with their mission and priorities. It was noted that, although the QAA definition was narrow, it related to the approach of the institution. Additional points raised were as follows:

- The perception of quality enhancement as a 'natural outcome of QA and thus a natural progression of the current IR process' was welcomed;

- Quality enhancement is sometimes seen as separate to quality assurance, and not something against which institutions should be measured;
- The increased emphasis on quality enhancement recognises the centrality of the learning experience;
- It would be beneficial to have a commentary on enhancement themes to enable sharing of good practice between institutions;
- The review methodology should not lead institutions to adopt a mechanistic approach to quality enhancement;
- Quality enhancement is a process, not an outcome;
- The increased emphasis on quality enhancement was welcomed;
- The self evaluation document should require institutions to identify evidence supporting the strategies put in place to enhance quality of provision;
- The outcome report should include a commentary on quality enhancement to enable best practice to be shared;
- The Welsh Assembly Government should give Welsh institutions support comparable to that available in England to undertake quality enhancement activities;
- Quality enhancement should not be within the remit of the IR;
- examples of quality enhancement might only be actively pursued within the IR when the review team were satisfied that the QA processes were sound;
- the scrutiny of IR activities should be on how institutions' quality enhancement activities reflect changes.

International reviewers (4 HEIs, 1 group, consultation workshops)

30. Points raised included the following:
- some respondents liked the concept of an international reviewer, and thought that the insight which could be gained from outside the UK would be beneficial;
 - it was queried whether an international reviewer would be a peer
 - there was concern that an international reviewer would only provide a perspective from their own country, rather than an international perspective;
 - the purpose of inclusion of an international reviewer was queried, with concern expressed if the purpose was benchmarking, but support if the purpose was sharing good practice;
 - it was queried whether the international reviewer would be an additional member on the review team, or would replace an existing member;
 - it was noted that this might increase the cost of the IR.

Outcome reports (2 HEIs, 2 organisations, consultation workshops)

31. Most respondents were in favour of having a report which was more widely accessible. Students reported that a reduction in jargon would be helpful in

reducing students' apprehension about the IR. It was requested that reports should have a commentary on all aspects specifically examined in the review. Another respondent requested further information on credit within the outcome report.

Annex D: Respondents to Circular W08/31HE

Aberystwyth University
Bangor University
Cardiff University
Credit and Qualifications Framework for Wales
Estyn
Fforwm
Glyndŵr University
Higher Education Wales
Quality Assurance Agency for Higher Education
Swansea University
University and College Union
University of Glamorgan
University of Wales Institute, Cardiff
University of Wales Lampeter
University of Wales, Newport