

Cyngor Cyllido Addysg
Uwch Cymru
Higher Education Funding
Council for Wales

Cwrt Linden
Clos Ilex Llanisien
Caerdydd CF14 5DZ
Ffôn 029 2076 1861
Ffacs 029 2076 3163
www.hefcw.ac.uk

Linden Court
Ilex Close Llanishen
Cardiff CF14 5DZ
Tel 029 2076 1861
Fax 029 2076 3163
www.hefcw.ac.uk

hefcw

Cylchlythyr

Circular

Amendments to the Institutional Review: Wales method, and the developmental review of foundation degrees

Date: 08 November 2011
Reference: W11/42HE
To: Heads of higher education institutions in Wales
Principals of directly-funded further education colleges in Wales
Response by: No response required
Contact: Name: Dr Cliona O'Neill
Telephone: 029 2068 2283
Email: cliona.oneill@hefcw.ac.uk

This circular provides the outcomes of the consultation we published in May 2011 on amendments to the Institutional Review: Wales method. It also provides an update on the developmental review of foundation degrees (Fds) in Wales, which we have asked the QAA to carry out in 2012/13.

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Introduction

1. This circular provides the outcomes of the consultation we published in May 2011, [Circular W11/18HE, Consultation on amendments to the Institutional Review: Wales](#).
2. It also provides an update on the developmental review of foundation degrees (Fds) in Wales, which we have asked the QAA to carry out in 2012/13.

Background

3. The Institutional Review: Wales (IRW) was introduced as a six year cycle in 2003/04. The method was revised in 2009/10 as a rolling process, which could be amended without waiting for the end of a cycle. In May 2011 we published a consultation on revisions to the method.
4. HEFCW's Quality Assessment and Enhancement Sub-Group (QAESG), Student Experience, Teaching and Quality Committee (SETQC) and Council considered the outcomes of the consultation and agreed a series of amendments to the method.

Amendments to the Institutional Review: Wales

5. We received fifteen responses to the consultation. A detailed overview of these is provided at **Annex A**. The changes being made to the IRW in response to the consultation are detailed below.

Change to the number and categories of judgements

6. The number and categories of judgements will be amended from 2013/14 to align with Institutional Review for England and Northern Ireland (IRENI), including a new judgement on public information.
7. The comments on quality enhancement and the accuracy and completeness of public information will be replaced with judgements on these areas. A separate comment on postgraduate research (PGR) programmes will be retained, for the following reasons:
 - PGR provision was incorporated explicitly into the QAA's assessment from 2006 because there were concerns about the lack of systematic review of this area, with the associated risk that HEFCW funding might be provided to institutions where provision was not satisfactory. This consideration remains valid.

- Postgraduate research degrees form a significant area of provision in Welsh HEIs, currently involving around 3,600 students (full time equivalents).
- PGR is a distinct area of activity, with different issues from taught provision (eg nature of supervisory arrangements, research environment).
- There is a risk that, if it is not explicitly identified within the IRW, it will be overlooked in the context of the much larger volume of undergraduate taught provision.
- There is the option of identifying PGR as a review trail from time to time. However, this approach could mean that this area of activity is only looked at intermittently.
- Inclusion of this comment will enable us to promote PGR more effectively.

Changes to outcome terminology

8. The outcome terminology will be amended to align with that used in IRENI, to enable comparability with other countries of the UK.

Removing grading of recommendations

9. The grading of recommendations will be removed to provide comparability with other countries of the UK and eliminate any potential disadvantage to Welsh HEIs by a perception that grading means institutions are weaker in areas covered by recommendations.

Inclusion of affirmation of actions in progress within the IRW

10. Affirmation of actions in progress will be included within the IRW. This will benefit institutions which are in the process of implementing change.

Replacement of the 3 day briefing visit by a one and a half day meeting

11. The 3 day briefing visit will be replaced by a one and a half day meeting. We will ask the QAA to: provide institutions with pre-planned focussed visit plan in advance to ensure the best use of the time; implement mechanisms to ensure the HEI is fully informed; and require reviewers to read the documents beforehand, to ensure that the team has sufficient opportunity to become familiar with the institution being reviewed.

Publication of action plans

12. Action plans will be agreed with the QAA and published in a standard format within an appropriate time frame. This will make information on actions more accessible to a wider audience and enable institutions to demonstrate that they are addressing the review recommendations.

Revision of judgement

13. There will be an opportunity for the outcome judgements to be revised. We will ask the QAA to make it clear via its website that there had previously been a negative judgement, and to provide links to the action plan, follow-up report and the revised judgement. The process for the revision of the judgement will be sufficiently robust to ensure that concerns had been appropriately addressed and would not recur.

Inclusion of student charter within the documentation for IRW

14. Student charters will be included within the documentation for IRW. We recently published [Circular W11/31HE: Guidance on the development of student charters](#), which requires all HEIs and FEIs with directly funded HE provision to have a charter in place by 1 August 2012.

Change in the timetable for amendments to IRW

15. The timetable will be amended to align with that of IRENI, with substantive changes being agreed at least 6 months before the start of the academic year in which a tranche of reviews are to be carried out, and allow the process to be more responsive to change than is possible with a 12 month notice period.

Other changes to IRW

16. From 2012/13 a QAA officer will be present for the whole of the review visit.
17. As stated in Circular W11/18HE, we will ask the QAA to make the following changes to the operation of the process, which were not subject to consultation:
 - i) Increased use of videoconferencing and teleconferencing
 - ii) Involving a larger number of students
 - iii) Use of a lead student representative
 - iv) Electronic document submission
 - v) Using four reviewers (and five for a hybrid review)
 - vi) Producing the report a shorter interval after completion of the review.

18. We will also ask the QAA to:
 - Include clarification in the revised IRW handbook that the new UK Quality Code for Higher Education will detail more stringent requirements regarding the provision of information
 - Ensure that the published reports are clear regarding whether the review method used included visits to collaborative partners i.e. hybrid method
 - Continue to recognise the importance of alignment of institutions with the Credit and Qualifications Framework for Wales.
19. We will consider the IRW method with QAESG on an annual basis. In addition, further changes to IRENI are expected in response to the publication of the White Paper in England. We may therefore need to consult further on the IRW method in the current academic year.
20. Under the method for 2011/12 institutions receiving a limited confidence judgement will normally be reviewed again within four years of the previous review, and those receiving a no confidence judgement will be reviewed again within two years. We will consider this risk-based approach with QAESG to determine how it can best be managed from 2012/13 in the context of the changes to the numbers, categories and terminology of judgements described in this circular, and the development of a more risk-based approach for IRENI.

Other related developments

21. We have asked the QAA to carry out a developmental review of foundation degrees in Wales in 2012/13, in accordance with our intentions described in [Circular W10/29HE: Foundation Degrees](#). The specification for the review is attached at **Annex B**.
22. You will need to be mindful of the ongoing development of the [UK Quality Code for Higher Education](#), which will be officially launched in December 2011 and will replace the Academic Infrastructure from 2012/13. The first elements of the Quality Code were published in October 2011.

Further information / responses to

23. For further information, contact Dr Cliona O'Neill (Tel 029 2068 2283; E-mail: cliona.oneill@hefcw.ac.uk).

Annex A. Responses to the consultation in [Circular W11/18HE, Consultation on amendments to the Institutional Review: Wales.](#)

Introduction

We received 15 responses to the consultation. Some of these were less explicit in stating whether they were in favour of proposed changes, saying that they did not object, rather than that they were in favour. We have attempted to reflect this in the summary below.

General comments

A number of general comments were made by respondents. These included the following:

- The changes recommended would reduce cost and improve effectiveness of reviews for both HEFCW and the institution.
- The quality assurance system should support a culture of quality enhancement, encouraging and enabling institutions to integrate this and embed it in all activities. The proposed revisions would facilitate this.
- The definitions of substantive and minor changes form a useful benchmark for differentiating whether or not changes are to be subject to consultation.
- It was appropriate to introduce the proposed changes for institutions undergoing review from 2012/13.

i) Change to the number and categories of judgements

In favour/do not object – 15

Responses were in favour of changing the number and categories of judgements to align with Institutional Review for England and Northern Ireland (IRENI), including a judgement on public information. Responses noted:

- the importance of having similar judgements in Wales to those in England and Northern Ireland to facilitate comparability, including by prospective students, and to aid institutions in learning from each other;
- it would be helpful to receive clarification on what would be included within the public information judgement, including Key Information Sets (KIS);
- the same amount of time should be given to Welsh institutions to implement the KIS as English institutions before a judgement on public information was made part of the Welsh review methodology;
- The KIS was likely to form an important part of the data used for reviews;
- reservations about the KIS, including the significant workload, the complexity of dealing with joint honours provision, collection of data for schemes with small student numbers, and the importance of ensuring that the data is robust.

- The consultation had not clarified whether comments on postgraduate research programmes would continue;
- Greater involvement of students as active partners in shaping their learning experiences was welcomed and should be included in guidance supporting the judgment concerning 'enhancement of students' learning opportunities'.

ii) Changes to outcome terminology

In favour/do not object – 15

Comments: respondents noted that:

- the proposed terminology was more public-friendly and meaningful than the judgements used in the existing IRW method;
- the change in terminology to align with IRENI would facilitate UK-wide comparability, which was paramount;
- the greater gradation of judgements would allow for recognition of good practice in institutions beyond that which is recognised as satisfactory.

iii) Removing grading of recommendations

In favour – 15

Comments: respondents noted that:

- Removal of the grading of recommendations would provide comparability between universities in Wales, England and Northern Ireland, and the UK 'brand' is also shared;
- Grading has been helpful, and if there are no gradings then institutions should be asked to indicate the relative importance or immediacy of response to the recommendations;
- Removal of the grading of recommendations would be fairer for students and helpful for readers of the reports, who might not understand different grading of a similar recommendation at different institutions

iv) Inclusion of affirmation of actions in progress within the IRW

In favour – 15

Comments: respondents noted that:

- it would be useful for potential students and the public to understand what actions are being taken to improve quality and standards at an institution, especially in the context of increased fees and raised expectations.
- This will benefit institutions which are in the process of implementing change, particularly given the need in the modern environment for change;
- the introduction of affirmations appears to support the spirit of peer review and quality enhancement;
- This will be fairer to institutions, particularly as the report will be written more for the general public;

- This should lead to a more transparent and responsive system which will emphasise the actions and responses of HEIs, rather than being overly-focussed on a six-yearly cycle of judgements.

v) Replacement of the 3 day briefing visit by a one and a half day meeting

In favour – 14

Against – 1

Points raised by respondents included that:

- A more focussed event was welcome;
- Confidence that the purposes of the visit could be achieved in one and a half days;
- It would be necessary to ensure that this change was not viewed solely as a cost saving exercise;
- A pre-planned focussed visit plan should be provided well in advance to ensure the best use of the time;
- This would be challenging for review teams, and the Quality Assurance Agency (QAA) should ensure that reviewers read the documents beforehand so that they did not request unnecessary additional information following the briefing visit.
- This would not affect quality of the briefing. However, inclusion of potential informal contact where clarification is needed after that event would be valuable.
- This was the only proposed change which would not influence the comparability of quality and standards as judged by IRENI and IRW.
- Mechanisms should be put in place to prevent the HEI being left less informed.

The response that disagreed with this change stated a concern that a reduction in length of the briefing visit might prove detrimental to the review process from the perspective of both the institution and the review team, as the three day visit offered the team time to familiarise themselves with their surroundings, facilities and key members of staff.

vi) Publication of action plans

In favour/do not object – 15. One response did not explicitly endorse the publication of the plans, noting that they were ‘likely to require higher abstraction than for committees’

Points raised by respondents included the following:

- The rationale for the proposal was clear and persuasive, and the proposal was fair.
- It would increase transparency and responsiveness, disseminate good practice, demonstrate the usefulness of the IRW, and allow students and the public to see actions taken by the HEI as a result of the IRW.
- There should be a standard format to promote consistency across institutions. This could be achieved by the QAA providing a template for action plans.

- Institutions needed to be given an appropriate length of time in order to generate an effective action plan.
- There should be clarity if the Institution's Action Plan needed to be agreed with the QAA.
- Publication of action plans for a wide audience was likely to require higher abstraction than for their use internally, but this should not prevent openness.
- The publication of action plans supported the spirit of peer review and quality enhancement.
- It aligns with internal quality mechanisms which require action plans to be produced at key points in the monitoring and review processes.
- The involvement of students in producing the plan was welcome.

vii) Revision of judgement

In favour – 15

Points raised by respondents included the following:

- This would limit the unintended consequences of damaging the institution's reputation, which indirectly damages the perceived quality of the degree for current students. However, memories do not fade immediately.
- The system must be sufficiently robust to ensure that concerns have been addressed properly, and mechanisms put in place to avoid any repeats.
- It would be helpful to clarify whether the original judgment is replaced or whether the revised judgement is published alongside the original judgement.
- It should be clear that there has previously been a negative judgement, together with a link to the approved action plan, follow-up report and the revised judgement.
- Greater clarity was required on how the revision judgment be will made, by whom, the methodology of this process, and whether this requires an additional QAA visit.
- It allowed institutions to demonstrate that they have addressed their review outcomes and was to everyone's advantage;
- This supported the spirit of peer review and quality enhancement, and should lead to a more transparent and responsive system which will emphasise the actions and responses of HEIs, rather than being overly-focussed on a 6-yearly cycle of judgements.

viii) Inclusion of student charter within the documentation for IRW

In favour/do not object – 14.

No response - 1

Points noted by respondents included the following:

- Student charters should provide a focus for regular engagement and review with student representatives, to consider alongside other feedback from students and internal quality assurance and management information.

- Student charters in Wales should be based on the work undertaken by the Student Charter Working Group in England, with the addition of information relating to the Welsh language and any other relevant Wales specific issues.
- Support for the commitment to involving students in QA processes.
- The Student Charter, along with other elements of the Key Information Set and the Public Information requirements outlined in the review methodology, should be clarified.
- The addition of student charters would amplify the student voice and this is welcomed, would benefit institutions and students, and assist in making the student the focus of delivery and support.

ix) Change in the timetable for amendments to IRW

In favour – 13

Against – 1

No response – 1

Points noted by respondents in favour of changing the timetable included the following:

- This would provide consistency across all HEIs in England, Wales and Northern Ireland;
- This would provide a more responsive IRW process at this time of significant change in HE;
- It was sensible to ensure all institutions being reviewed in any academic year are reviewed under the same method rather than having different methods used within the same year;
- It offers flexibility for changes and is a justified approach.

The respondent who disagreed with the proposal noted that:

- Preparing for IRW takes longer than 6 months, and therefore 12 months notice should remain for substantive changes.
- Minor changes could be introduced within the timescale of 6 months;
- The definition of academic year was not helpful, since postgraduate, part-time, and collaborative programmes do not necessarily start in September and may operate multiple intakes.
- Any proposed model should avoid being based on a traditional, full-time undergraduate programmes structure and it would be more appropriate to use a fixed date each year, rather than an academic year.

Other changes

No response on other changes was required, however, some respondents provided feedback on these. This included:

- The changes seemed sensible and in line with current developments.
- The introduction of a lead student representative would facilitate the dissemination of information to the student body, provided student engagement mechanisms were in place and consistently used.
- Support for the use of technology in the IRW process;
- Welcomes the increased role of the use of technology in the IRW process and a larger number of students being involved in the process;

- The increased involvement of students in the process, would promote a quality assurance system which respected students as active partners in their learning experiences.

Respondents

Aberystwyth University

Bangor University

Cardiff University

Coleg Sir Gâr

Glyndŵr University

Higher Education Academy

NUS Wales

Open University

Swansea Metropolitan University

Swansea University

University of Wales Trinity St David

University of Glamorgan

University of Wales

University of Wales Institute, Cardiff

University of Wales, Newport

Annex B. Developmental review of foundation degrees

Introduction

1. This annex provides information on a developmental review of foundation degrees which we have commissioned the QAA to undertake in 2012/13.

Background

2. We originally launched Fds in Wales in 2001 through our publication of a Foundation Degree Prospectus (circular W01/23HE) and by the specific allocation of funding to HEIs for a limited amount of FD programme development. The Prospectus described the framework of core features that define the foundation degree to provide guidance for those institutions wishing to offer the new qualification. This was consistent with the Foundation Degree Prospectus published by the Higher Education Funding Council for England (HEFCE) in July 2000.
3. In 2008 the Welsh Government's skills strategy, *Skills that Work for Wales* signalled that the Assembly Government would develop and consult on a foundation degree (FD) policy. This commitment was reinforced in its strategy for higher education, *For our Future*, which stated an intention to support the qualification as a key enabler in relation to its twin priorities of social justice and a buoyant economy.
4. The Welsh Government subsequently asked HEFCW to take forward the development of Fds. Circular W10/29HE provided our policy on foundation degrees and invited regional proposals for One Wales funding for the development, promotion and delivery of new part-time FD provision. It announced our intention to commission a developmental review of FD provision during the funding period, to inform the development of these qualifications and assess the quality of the funded provision.
5. From October 2010 Welsh further education institutions have been able to apply for FD awarding powers. They must apply to the Privy Council with a statement setting out satisfactory arrangements for the opportunity for progression to more advanced courses of study, and meet stringent criteria in relation to:
 - Governance and academic management;
 - Academic standards and quality assurance;
 - Scholarship and the pedagogical effectiveness of academic staff;
 - The environment supporting the delivery of foundation degree programmes.
6. In 2004 the QAA published a Foundation Degree Qualification Benchmark. This was updated in 2010. All foundation degree provision across the UK is expected to meet the Benchmark.
7. The expansion in FD provision as signalled in *Skills that Work for Wales* is being delivered through the following channels:

- Higher Education Wales (HEW) ESF Collaborative Foundation Degree Programme
- Universities Heads of the Valleys Institute (UHOVI)
- New part-time provision (funded by One Wales provision), allocated by HEFCW on a regional basis and grounded in regional strategies.

QAA developmental review of foundation degrees

8. A number of Fd reviews have been conducted in England since the introduction of Foundation Degrees in 2000, no reviews have yet been commissioned in Wales.
9. We have therefore asked the QAA to develop and consult on a draft handbook for the review during 2011/12 and carry out the reviews in 2012/13.
10. This review will provide information more generally about how qualifications are being developed against the QAA Fd Benchmark and any issues arising with regards to this, for example employer engagement or progression arrangements. It should also help to identify good practice going forward.
11. Following consultation with Higher Education Wales, HEFCW developed a brief specification for the review. We have agreed that the review will:
 - i) cover all Foundation Degree provision in Wales, including provision which is funded through HEFCW teaching funding; funded specifically through HEFCW's Foundation Degree programme (via One Wales funding); funded through the HEW ESF Higher Skills Wales Programme; and provision delivered through UHOVI. This has been discussed with ESF and UHOVI managers.
 - ii) take account of the expectations of the different funders for this provision;
 - iii) focus on the responsibilities of the awarding body (higher education institutions) in terms of safeguarding the quality and standards of the provision;
 - iv) be developmental, in that it will provide recommendations for improvement rather than judgements;
 - v) Place more focus on newer provision, given that more established provision may have been in place during the previous Institutional Review cycle;
 - vi) include consideration of both directly funded and franchised collaborative Fd provision in FE Colleges;
 - vii) include visits by the QAA team to each HEI which provides or validates Fd provision in Wales, as well as at least one partner FE for each relevant HEI;
 - viii) include in the QAA visit, meetings with staff, students and employers, picking up the range of funded provision as appropriate;
 - ix) Result in an unpublished report for each HEI and HEFCW focussed on their provision;

- x) Result in a publishable overview report for Fd provision in Wales overall, summarising the outcomes and making recommendations for the future.