

Cylchlythyr | Circular

Outcomes of the Consultation carried out on the Quality Assessment Framework for Wales

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To: Regulated institutions in Wales
Other interested parties
Response by: No response required
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This circular provides the outcomes of the consultation carried out in circular [W16/14HE: Quality Assessment Framework for Wales](#).

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Introduction

1. This circular provides the outcomes of the consultation carried out in circular [W16/14HE: Quality Assessment Framework for Wales](#).

Background

2. Circular [W16/14HE: Quality Assessment Framework for Wales](#) provided a consultation on the underpinning processes to the draft framework for quality assessment in Wales.
3. Our Quality Assessment Committee (QAC) considered the responses to the consultation at its July 2016 meeting. HEFCW has taken account of the advice of QAC in determining how this work should be taken forward. HEFCW's Council has also approved the direction of travel.
4. Further work will be required to develop the Quality Assessment Framework, including work at UK level. Some aspects of the underpinning detail in Wales will be subject to further consultation.

Outcomes of the consultation

5. A summary of the points raised in the consultation is provided at **Annex A**.
6. The QAC advised that a range of points which were relevant to the UK-wide developments being taken forward by HEFCW via the UK-wide Standing Committee. These are provided at **Annex B**.
7. A list of the respondents to the consultation is provided at **Annex C**.
8. Actions to be taken in response to the issues raised in the consultation are detailed below.

General

HEFCW will:

- See whether any further streamlining of the quality assessment framework proposals could be achieved;
- Consult on further detail of how the framework would operate in practice as it is developed;
- Work with the other funders to maintain a UK-wide approach;
- Confirm that HEFCW had received confirmation that the proposals for the revised operating model to be implemented in Wales, and the transition arrangements, meet the Home Office requirements for educational oversight.

Q1. Are there any other Wales-specific elements which should be included in the baseline?

HEFCW will:

- Include Welsh language requirements within the additional Welsh-specific baseline requirements;
- Confirm that the framework is intended to be flexible to enable it to take account of developments in Wales and other parts of the UK;
- Consider whether student protection guidance should be introduced, potentially as part of the revised student charter guidance.

Q2. Are there any other cross-cutting issues which should be considered?

- Welsh Government would consider Wales' participation in TEF2 and beyond;
- Officers will include enhancement in the specification for the external quality review.

Q3. Are there any other areas of comparability across the UK which should be considered?

HEFCW will:

- Monitor developments in England to evaluate any impact on Wales;
- Work to ensure that changes to QA in Wales maintain the reputation of provision internationally;
- Work with England to ensure that there is appropriate referencing between the register in England and that proposed for Wales, as a common register did not appear to be possible, although it was desirable.

Q4. Do you have views on these statements, and the potential for aligning with the statements to be used in England and Northern Ireland?

- HEFCW will aim to ensure that the assurance statements from governors in Wales aligned where possible with the statements to be used in England and Northern Ireland.

Q5. HEFCW proposes to consult further on features and judgments, of this process, including ensuring that judgements align with on the HEFCE arrangements. What should this cover?

HEFCW will:

- Carry out a further consultation on the detail of the external quality review, which would take account of issues raised by respondents;
- The external review would include more emphasis on enhancement;
- Consult on whether the QAA should be the body to provide the external review in Wales, should it become the designated body for quality assurance in England;
- Clarify that there will be no mid-process review in the new framework, although quality would be integrated into HEFCW's triennial assurance review;
- Clarify that governing bodies would be free to place additional requirements on the process in light of the institution's mission and strategy;
- Clarify that it is for providers to decide whether to appoint a single body to review all regulated providers.

Q6. Are there any other areas of scrutiny which should be included for Wales?

HEFCW will:

- Continue to work with Welsh Government, who would make the decision regarding whether or not Wales can participate in TEF2 and beyond;
- Bring TEF data to QAC for consideration, to inform discussions regarding risk, and thus inform HEFCW's institutional risk review process.

Q7. Can you suggest any particular questions which you think we should integrate into our existing assurance processes and visits?

HEFCW will:

- Take account of the questions suggested by respondents for inclusion in existing assurance processes and visits, as they seemed to be appropriate, and frame them in a manner to be addressed by the governing body, with a focus on how it assured itself of quality;
- Produce a map of the interaction between the different quality assessment mechanisms as part of the further development of the framework, which would then be subject to consultation;
- Clarify the link between the triennial visit and quality assessment review, to ensure that there was no duplication, and to minimise the burden on institutions.

Q8. Are any additional actions or information required to ensure the views of students are captured effectively?

HEFCW will:

- Ask Wise Wales to promote the use of the partnership toolkit across the sector;
- Consider whether advice/ good practice on engaging with hard to reach students could be developed in partnership with Wise Wales;
- Continue to monitor the work in England on learning gain.

Q9. How might we operate this process in order to minimise institutional burden?

HEFCW will:

- Aim to cross-reference between processes and existing data, and not to duplicate;
- Consider whether the processes should be tested informally with regulated institutions in order to minimise institutional burden

Q10. Are there any issues which Welsh higher education providers would like us to feed into this UK-wide work?

See Annex B.

Q11. Do these proposals provide sufficient support for governing bodies? If not, please indicate what else might be helpful?

See Annex B.

Q12. Is anything else needed as part of our quality process, particularly regarding quality which is likely to become inadequate?

HEFCW will:

- Consult on proposals for addressing concerns in the future;
- Continue to keep the definition of provision which is (likely to become) inadequate under review;
- Continue to maintain an overview of subject outcomes, while confirming that inadequate provision would be considered primarily at institutional level;
- Develop a Memorandum of Understanding with the Office of the Independent Adjudicator (OIA) to ensure that any overlap is minimised;
- Liaise with the Competition and Markets Authority (CMA) regarding the provision of information.

Q13. Are there any other issues which should be considered within Annex A of the consultation circular?

HEFCW will:

- Continue to minimise burden and avoid duplication;
- Reiterate that the process is different to that in England, and that HEFCW has attempted to use existing processes and practices as much as possible to minimise the burden, and would maintain this approach;
- Emphasise that the same quality assessment arrangements apply to all provision, including bilingual and Welsh Medium provision;
- Update the annex from the circular and host it on HEFCW's website.

Q14. Are there any other areas which should be built into the timetable?

HEFCW will:

- Put the timetable on HEFCW's website and keep it updated, including in response to White Paper developments in England, and any decision regarding Welsh participation in TEF2 and beyond;
- Disseminate information on the international review work when available;
- Recognise the increasing demand on student unions, including through use of the Memorandum of Understanding between HEFCW and NUS Wales.

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

Summary of Quality Assessment Framework consultation

General points

Welcomed

- The time and effort that HEFCW has put into engaging with institutions, recognising that HEFCW would consult further as proposals were developed;
- The need for the quality system to evolve and innovate;
- The importance of aligning proposals/activities in Wales with those in England and Northern Ireland, including the benefits of consistency and a common approach to Quality Assessment (QA) and international comparability;
- The proposals recognised the devolved context and potential for retaining the QAA brand; Welsh-specific elements which recognise Wales' strengths, including students as partners, student engagement and the need for alignment with the Credit and Qualifications Framework for Wales (CQFW);
- A pilot year in 2016/17;
- That proposals addressed the requirements of the Wales Higher Education (HE) Act but did not overburden universities, whilst recognising increasing demands being made in relation to the Teaching Excellence Framework (TEF) and other developments in the White Paper;
- The significant role placed on the role of students within the wider quality systems;
- HEFCW's work in attempting to mitigate potential risks identified:
 - Reputational damage to the UK HE brand internationally
 - Lack of external verification of institutional quality
 - Erosion of student engagement
 - Fragmentation of UK wide system
 - Loss of sharing of good practice – limited mention of quality enhancement
 - Jeopardising Transnational Education (TNE) partnerships
 - Risk of Competition and Markets Authority (CMA) objections (removal of external QA for some of the HE sector, if it were to be retained for Alternative Providers and new entrants, is inconsistent with CMA expectations about a level playing field for all providers, and its entire removal presents a significant consumer risk)
 - Removal of academic peer review
 - Risk to co-regulation

Concerns/suggestions

- Need an integrating statement outlining the aims of the framework in achieving alignment with arrangements in England and Northern Ireland and, through shared mechanisms and approaches, reasonable comparability across the UK, to provide a coherent context for shared mechanisms, stating the purpose of the individual elements and describing how the totality of the processes provide assurance about the quality and standards of an institution's provision;

- Concern about a shift from a holistic review of an institution's quality and standards processes and approach to enhancement to a multi-stranded and more fragmented approach, reinforcing the need for a clear and concise context for these arrangements;
- Need more detail on how elements of the QA framework will operate in practice, and what this might mean in terms of judgements, outcomes, cost and overall burden;
- Concern that the framework did not represent a "light touch" approach, recognising that some elements were extensions/modifications of existing exercises, or are designed to meet the requirements of the 2015 Act;
- Monitoring of the requirements of the higher levels of the TEF and work on comparability of degree standards as they are potentially time and resource intensive, with the possibility that most impact will be felt at a discipline level
- Arrangements need to identify and support enhancement and continuous improvement, building on achievements to date;
- The UK system of quality assurance as applied in Wales should retain core principles of co-ownership and co-regulation and take account of any policy differences with the rest of the UK;
- Importance of ensuring that the arrangements in Wales meet the Home Office's educational oversight requirements for Tier 4 purposes.

Q1. Are there any other Wales-specific elements which should be included in the baseline?

Key points

Welcomed

- The inclusion of the UK-wide Quality Code as part of the baseline regulatory requirements;
- The general areas for baseline requirements are comprehensive and appropriate;
- The inclusion of the CQFW in the baseline regulatory requirements for Wales.

Concerns/suggestions

- The framework should also align with Scotland, where possible, to maintain a UK wide approach;
- Careful thought should be given to the maintenance and development of the quality code;
- Relevant Welsh language requirements should be included, taking account of the role of the Coleg Cymraeg Cenedlaethol in the promotion of Welsh medium higher education;
- Include European Association for Quality Assurance in Higher Education (ENQA) standards and guidelines;
- The UK-wide sector committee needs to include appropriate and proportionate representation from Wales;
- Clarification of the use of other elements of the current UK-wide Quality Code' at an early stage, particularly qualifications characteristic statements and subject benchmark statements;

- The QA system needs to be flexible to enable it to adapt to developments in Wales such as the Hazelkorn and Diamond reviews;
- Review governance arrangements in Wales to ensure they are democratic, representative and transparent;
- Develop student protection guidance, eg via
 - Ensuring that institutional student charters clearly articulate protection for students
 - build on the Wise Wales partnership for higher education and the OIA's good practice framework in providing a baseline for institutions.

Q2. Are there any other cross-cutting issues which should be considered?

Key points

Welcomed

- The issues appeared comprehensive.

Observation

- There was merit in maintaining a UK-wide body with a role in disseminating guidance and good practice, though this may be impacted by disaggregation of QA approaches.

Concerns/suggestions

- TEF:
 - It was essential for Wales to participate in TEF2 and beyond in order to maintain cross-sector consistency and comparability
 - Wales should be able to apply inflationary fee increases in response to TEF outcomes – this would need to be considered in the context of CMA requirements, and the Diamond review recommendations
 - Contextualisation of the metrics was essential to ensure Welsh institutions were not disadvantaged
- Social justice and widening access, and the need for a QA approach that recognises and supports the principles of supporting access to all who can benefit;
- Consider policy and practice in relation to Welsh medium delivery and support for bilingualism, as they impact on UK-wide issues such as external examining, and comparability of standards across all provision;
- Further emphasis on enhancement;
- Recognition of the role and voice of staff delivering teaching and learning;
- The impact of different level 3 entry qualifications on institutional comparisons/ league tables;
- Align assessment of foundation years with QA of HE;
- International work is often categorised as UK sector.

Q3. Are there any other areas of comparability across the UK which should be considered?

Key points

Welcomed

- The proposed approach supports alignment with, and a common foundation for, a UK-wide QA system;
- The areas have been correctly identified.

Concerns/suggestions

- How the process for the approval of new private providers will work;
- The impact to the UK HE brand and the Welsh sector if there is a loss of comparability across the UK achieved under QAA review;
- Concerns on the impact of cross-border study if there are no plans for a market regulator in Wales;
- It might be useful to develop shared approaches to the effective role of Governors to support common approaches to their increased oversight responsibilities, including briefing, training and development;
- Any Welsh framework should take account of the impact on quality arising from proposals that new English Universities could offer degrees almost immediately;
- The UK Quality Code should be maintained as the consistent benchmark for quality in UK higher education;
- It is essential that the reputation of UKHE is retained through such areas of comparability and the processes which underlie them;
- Appropriate metrics should be used to measure quality;
- Consider student mobility and portability of qualifications in a European and a European Union (EU) context;
- Monitor the progress of the HE Bill in England as it makes its way through Parliament, and ensure that developments in England do not damage UK wide structures and processes that underpin the reputation of UKHE internationally or disadvantage Wales;
- Any strengthening of the external examiner system must take account of the Welsh language context;
- There should be a UK-wide register of Higher Education Providers;
- Require a consistent format for HEI Governing Body annual statements across England, Wales and Northern Ireland.

Q4. Do you have views on these statements, and the potential for aligning with the statements to be used in England and Northern Ireland?

Key points

Welcome

- The statements seem appropriate in relation to risk-based review arrangements and will be helpful to the governing body in respect to their greater role in overseeing quality assessment and providing assurances to HEFCW;
- Potential for aligning with the statements to be used in England and Northern Ireland.
- The developments provide opportunity for individual institutions to review and strengthen internal monitoring and reporting processes;

- The approach for annual assurance puts the student experience at the centre of its annual process;
- The requirement to get expert external advice should give confidence that a provider's management of academic quality and standards meets the UK's high baseline requirements.

Concerns/suggestions

- It will be important to be able to place the statements within a holistic quality assurance framework;
- Clarification whether the statements are alternatives or all five will form the annual governors' assurance;
- Further clarification of the gateway arrangements for Wales; Clarification of the term 'to the best of our knowledge';
- There should be greater definition and detailing of the requirements which underpin these statements;
- Further development of templates and formatting would support the work of Governors and Academic Board/Senate to sign off the statements;
- The annual statements for all four UK nations should be aligned as far as possible to underline the equivalence of quality and standards across the UK;
- Clarity on whether the statements would cover collaborative provision (including internationally), and if so, the information that would be required;
- Greater clarity on what the report and action plan should include, including accuracy of information, compliance with Professional, Statutory and Regulatory Body (PSRB) requirements and compliance with CMA guidance;
- The need to develop and support Governors, which might impact on Board composition;
- Monitor the potential for divergence across the countries of the UK to ensure that Welsh institutions remain competitive and comparable;
- The potential for confusion of roles and responsibilities between the governing body (or Council) and Senates or Academic boards. It is unclear whether the proposals to place a greater responsibility on governing bodies required a change to an individual institution's governance documents.

Q5. HEFCW proposes to consult further on features and judgments, of this process, including ensuring that judgements align with on the HEFCE arrangements. What should this cover?

Key points

Welcome

- The shared use of the Quality Code and Framework for Higher Education Qualifications (FHEQ) across UK-wide QA arrangements should provide a broad base to support general alignment;
- Acceptance of the principle of obtaining external assurance from an agency on the European Quality Assurance Register (EQAR);

- The features and judgements of the Higher Education Review: Wales (HERW) process were appropriate;
- The more robust and independent approach in Wales compared to England.

Concerns/suggestions

- Follow-up procedures in the event of an unsatisfactory judgement;
- Whether there will be mid-term reviews such as those currently carried out by the QAA;
- Whether external assurance will be needed following the introduction of significant new provision;
- Consider further the judgements themselves, and actions arising;
- Further work should be done to determine and calibrate the elements of the quality code which will direct the formation of judgements;
- The review could focus on the standards in Part 1 of the European Standards and Guidelines (ESG);
- Governing bodies should be free to place additional requirements on the process in light of the institution's mission and strategy. This would place greater emphasis on governing body assurance while ensuring consistency across the sector and meeting the requirements of the European Standards and Guidelines;
- Recognition that changes in England as a result of the White Paper and HE Bill, may have implications for Wales;
- HEFCW should nominate a provider to undertake these assessments across Wales for a 6 year cycle, to bring transparency to the process as one provider will be undertaking all of the assessments and raise public understanding/awareness of the process;
- If the QAA continues to play a significant role in the external assurance of quality processes in England, then it would be helpful to use the QAA as the agency for external assurance in Wales to provide consistency across institutions and across the UK HE sector;
- Any agency would need to understand the context of Wales within the UK and have appropriate Welsh language capacity;
- Observation that the level of prescription is not wholly consistent with the emphasis on governing body responsibility;
- A request for clarity on whether the external assurance reports would be public documents;
- Clarify if the EQAR review covered overseas provision, or whether a separate review of this was required;
- Concern that the methodology is substantially different from England, and that Wales might be disadvantaged, including in terms of aligning judgements. It could be viewed positively in that Welsh HEIs welcome external scrutiny but also negatively in that institutions lack confidence in their own internal processes;
- Prioritise focus on quality enhancement rather than assessment;
- Differing formats for reviews, evidence requirements and outcome judgements by EQAR members might make comparison of outcomes difficult;
- The need to maintain evidence driven approaches, account for diversity within the sector, and provide comprehensive judgements for HEFCW

and the wider sector, linking into areas such as risk analysis for monitoring inadequate quality;

- The need for such external review to be undertaken within a clearly-defined context and with a clearly-stated purpose;
- View that Higher Education Providers (HEPs) will be required to undertake a significant amount of work to review the constitution of their governing bodies, to train/support governors appropriately to discharge their new responsibilities effectively, as well as to undertake a far more managed approach to QA and associated data management and analysis, rather than ensuring processes are followed;
- It may be considered a step back in QA to engage with bodies which maintain oversight through administrative audit as opposed to academic engagement;
- The prescription of requirements could be limited to alignment of judgements with those in the HEFCE arrangements; alignment of scope with the baseline requirements and so covering both academic standards and quality; Outputs which support the governing body's annual assurance statement (including reference to Part 1 of the European Standards and Guidelines; The use of external peer reviewers and involvement of students;
- It would be helpful to have more transparency concerning the linkages between the annual assurance reports to HEFCW; the triennial assurance visits by HEFCW and the external quality review; and how quality matters are built into Council institutional/other visits and assurance processes, as they do not appear to reduce the burden of quality assurance.

Q6. Are there any other areas of scrutiny which should be included for Wales?

Key points

Welcome

- The data suggested for scrutiny is comprehensive and appropriate, and would enable comparability across the UK.

Concerns/suggestions

- The proposed annual scrutiny will work for full-time undergraduate students, it will be far more difficult to acquire meaningful data for non-standard groups, including Postgraduate Taught students (PGTs), Postgraduate Research Students (PGRs) and distance learners, where numbers may be small Postgraduate Taught Experience Survey (PTES) and the Postgraduate Research Experience Survey (PRES) could be included;
- Permit HEIs to provide supplementary narrative to provide context to retrospective data;
- Recruitment patterns should be part of the overall risk review process rather than being a QA matter;
- It would be useful to see data definitions, including detail of benchmarking and the impact of marketisation;

- Welsh language, and the evaluation of Welsh medium (WM) provision, should be included as appropriate, to ensure students are not disadvantaged;
- Accuracy of information for applicants and registered students;
- Transnational Education (TNE) student opinion;
- How differential outcomes for students with different characteristics operate in practice, and how the annual scrutiny of data dovetails with the governors' annual assurance statement;
- The link to the metrics used in the TEF is likely to become increasingly important in terms of data analysis and reporting. TEF measures should be used, particularly student-facing metrics, irrespective of whether or not Wales continues beyond TEF1, to aid comparison across the UK;
- The data collected should be in line with England and Northern Ireland;
- The currency and applicability of data is important in terms of the point at which robust data can be made available and the applicability of data, particularly for small programme areas;
- Approaches to widening access should be explicit, and the addition of widening access statistics will be necessary, particularly following any Welsh Government action on widening participation;
- It would be useful to have support mechanisms alongside the scrutiny, particularly for HEIs which do not achieve their benchmarks;
- HEFCW should compare franchised against directly funded college performance;
- FEIs should be able to review NSS, Higher Education Statistics Agency (HESA) and Destinations of Leavers from Higher Education (DLHE) performance data using internal programme codes, as data is often amalgamated due to small number.

Q7. Can you suggest any particular questions which you think we should integrate into our existing assurance processes and visits?

Key points

Comments

- The questions posed in this process should remain tightly aligned with performance in TEF1 and TEF2;
- Further information on HEFCW's triennial assurance visits and how 'building quality' into them will dovetail with the annual governors' assurance statement, annual data analysis by HEFCW and 6-yearly EQAR external assurance;
- Support for a process that is not overly burdensome and aligns with England's model;
- Support the broadened agenda for assurance visits to incorporate consideration of quality, to be informed by risk review processes;
- Recommendation to gather and disseminate best practice across the sector.

Suggested questions/areas

- Follow-up issues from the most recent review;

- Whether there have been any recent developments affecting, or having the potential to affect, student experience and quality;
- Whether there have been any adverse PSRB reports;
- A focus on student well-being and support;
- An effective measure of high quality teaching (all current measures are proxies);
- Staff qualifications and training;
- Questions relating to the provider's mission and strategic direction;
- Review of the effective operation and bedding down of new arrangements, including discussion with Governors in relation to their new roles and responsibilities for oversight;
- Continuity between academic, strategic and financial planning processes, and questions related to the impact of business and financial areas on areas related to quality of provision, infrastructural investment and the student experience;
- Questions in relation to student engagement and student partnership, including revisiting relevant partnership questions with the Wise Wales project, closer to the time, to accurately gain institutional knowledge;
- The institutional context; the management of quality and standards; engagement with students as partners; management of student concerns; enhancement activities and best practice;
- The areas of quality enhancement the institution is working upon and why;
- Are there any academic quality themes currently arising across the institution, or from a specific area within the institution which you believe action will need to be taken upon?
- What are the main successes of the approach to quality assurance within the institution?
- How do we ensure quality processes map onto HEFCW and Welsh government priorities? What measures are in place to ensure effective student partnerships? How is a culture of enhancement being established within the quality structures and processes? How do University structures and processes enhance the student learning experience?

Q8. Are any additional actions or information required to ensure the views of students are captured effectively?

Key points

Comments

- Difficult to capture the views of all types of student rather than primarily focusing on full-time undergraduates;
- NSS is not a reliable indicator in itself and there will be a need for comparable data from other student groups in order for action plans to be all-embracing.
- Small cohorts result in a lack of published National Student Survey (NSS) data;

- Sector guidance for students and Student Unions (Sus) will ensure they can take full advantage of opportunities to effectively engage with quality assurance and enhancement;
- Agreement that partnership arrangements between the student body and HE providers in Wales are well developed;
- The proposals build appropriately on previous and continuing student engagement initiatives in Wales;
- Wise Wales provides evidence of a partnership approach, distinctive to Wales, which has led the way in engaging students in a meaningful way;
- Agreement that the processes for demonstrating partnership arrangements seems appropriate and preferable to the narrower approach to student engagement proposed for England;
- Agreement that the responsibility rests with the governing body for demonstrating, through the annual quality report, that there are effective mechanisms in place for gathering student views and for demonstrating how student views inform the operation and evaluation of quality processes;
- Welcoming the extent to which the proposals align with common practice and expectations across institutions;
- It is essential that student partnership and engagement is seen as a proactive tool supporting quality assurance and enhancement;
- There is a lack of opportunity for teaching staff to contribute their views to the processes that will enhance the quality of the HE experience;
- A system that does not over burden universities or student unions is essential.

Suggestions

- The PTES and PRES could be included for PGT and PGR students;
- Clarify whether the Quality Assessment Framework (QAF) applies to transnational education;
- Additional sector resources such as the use of QAA Student Engagement Advisors could be used more widely to inform and more effectively engage students in these processes;
- a range of exploratory approaches to gathering student views will be designed and piloted in England and it will be worth monitoring the outcomes of these;
- HEFCW could work towards the development of a framework, student engagement or student partnership strategy to help support greater consistency and comparability across HEIs, whilst respecting individual institutional priorities and profiles;
- HEFCW should, through Wise Wales, take into account existing frameworks which have been developed to respond to the student voice and how the institution has responded to actions arising from the student voice process;
- Define 'relevant committee', and clarify how often committee membership (and student inclusion or lack thereof) should be revisited;
- Should include student scrutiny on a far wider range of survey and other data than just the NSS;

- Support efforts to ensure that appropriate and effective student representation is recognised at all levels of the process, including at a Welsh and UK level;
- There may be an opportunity to discuss with Wise Wales the possibility of a toolkit-type approach for student unions and staff that highlights best practice across the sector and sets out the minimum that each could expect;
- Any approach should make use of existing partnership/feedback mechanisms in universities and students unions;
- Develop guidance for SUs on obtaining the views of the 'hard to reach' student;
- Further consideration of how to take account of student opinions from international collaborative partnerships and whether such approaches may provide indicators towards operational risk matrices for inadequate quality.

Q9. How might we operate this process in order to minimise institutional burden?

Key points

Comments

- A system which does not create an additional burden for institutions or SUs is vital, but it is difficult to determine the likely cost and burden of the proposed approach at present, despite some of these engagements being extensions/modifications of existing exercises/designed to meet the requirements of the HE (Wales) Act.
- The requirements of the higher levels of the TEF and the work on comparability of degree standards are potentially time and resource intensive, with the possibility that the bulk of the impact will be felt at a discipline level. As these aspects develop, it will be important to monitor their cumulative effect.

Concerns/suggestions

- Each institution should have its own framework for monitoring and delivering enhancement and to use this rather than a set template;
- Would welcome a process that is proportionate and appropriately evidence-based. There is potential for less documentation and more observation;
- Use existing QA processes and frameworks where possible, to respond to the student voice;
- Student partnership should be an integral element of annual reporting and the assurance visit process;
- Quality engagements need to focus attention where most needed to promote enhancement. They should be risk-based, proportionate and contextualised, based on a solid understanding of a provider's capacity to manage its own quality;
- Quality profiling that makes better use of existing quantitative and qualitative data;

- A more explicit focus on students' academic experiences, with greater consideration given to student outcomes;
- Further development of an enhancement relationship with higher education providers, using annual dialogue;
- It is important not to duplicate processes and to enable cross reference between processes;
- HEFCW should encourage institutions to align their internal processes with the needs of the Fee and Access Plans and TEF, and then they should be rewarded for effective operation by minimising additional work;
- HEFCW may wish to develop guidelines on the format of information required to be submitted, which may be built on by individual institutions to form their own documentation for corporate governance scrutiny.

Q10. Are there any issues which Welsh higher education providers would like us to feed into this UK-wide work?

Key points

Welcome

- The opportunity to participate in this work and to ensure that Welsh providers contribute to the development of work on degree standards, including work on Grade Point Averages (GPAs) and different approaches to the calibration of standards;
- Professionalisation, central registration and training for External Examiners could be beneficial in improving consistency across the sector.

Concerns/suggestions

- There needs to be representation from Welsh institutions and students on the UK-wide Standing Committee;
- Training for external examiners should take account of existing arrangements across the sector. It should be relevant and take account of WM provision, in order to play an important part in enhancing the system; Query whether the current pool of external examiners was large enough to support the existing structure, and concerns that enhanced requirements could reduce the available pool by discouraging academic staff from becoming, or continuing as, external examiners. The changes also posed risks to the recruitment of external examiners who are not in the employment of other HEIs;
- Whether briefings will include external examiners for masters and PhD;
- The geographical spread of potential examiners may impact on the ability of institutions within Wales to recruit as effectively;
- Concerns raised/clarification sought over sources of funding for proposed developments, including enhanced fees for External Examiners;
- Areas which might benefit from clarification include:
 - A central code of conduct;
 - Clarity over expected work volumes and expectations
 - The remit of external examiners
 - Full recognition of the professional role within the Examiners' home institutions;

- Developing a ‘panel’ approach to External Examining to provide the most independent, objective and effective approach to ensuring standards.’
- The future for subject benchmark statements needs to be clarified, given the proposal for future calibration of standards by subject experts;
- The publication of guidelines for algorithms is not necessarily helpful given the differences in the sector in the design of programs and associated regulations – providing an algorithm in isolation will not solve the problem that it may be intended to solve;
- Recognition of the growing funding gap between Welsh and English HE;
- It will be important to monitor the resources required to operate any new approaches, prior to any future full implementation;
- Concern that Welsh HEIs continue to benefit from parity of value within the UK HE system to maintain the standing and reputation of degree awards when assessed against UK-wide institutions, which can be evidenced internationally;
- Recommend the use of national credit frameworks (in institutions awarding credit) is emphasised within the UK-wide work on degree standards;
- Querying how a simple mechanism to bring together external examiners will fit with subject benchmark statements, in relation to calibration of standards.

Q11. Do these proposals provide sufficient support for governing bodies? If not, please indicate what else might be helpful?

Key points

Comments

- Agreement with the proposals

Concerns/suggestions

- The proposed quality assessment framework for Wales places specific responsibilities on governing bodies, and will therefore require additional support, training and guidance, particularly for student members; There are implications for the composition of the Board, to include bringing in additional experience and expertise to ensure appropriate oversight of areas relating to HE standards and quality;
- The importance of setting out a clear and concise context for these arrangements, stating the purpose of the individual elements and describing how the totality of the processes combine to provide the necessary assurances regarding the quality and standards of an institution’s provision;
- Additional resources will be required to achieve the appropriate levels of responsibility;
- Any training provided should include representatives from the HEI in order for the institutional context to be established;
- HEFCW will need to ensure that any Wales specific features, which are divergences from UK-wide approaches, are clearly articulated to governing bodies;

- There should be a review of the governance arrangements in Wales, with a requirement for staff and students to be members of governing bodies;
- New measures are necessary to ensure that the governance of higher education institutions is democratic, representative and transparent;
- The role of the Board of Governors should be that of the 'critical friend', challenging when necessary.

Q12. Is anything else needed as part of our quality process, particularly regarding quality which is likely to become inadequate?

Key points

Welcome

- The existing QAA concerns mechanism is appropriate;
- The focus on the protection of the international reputation of the UK higher education brand, the proposed further work to be undertaken in this area and the indication that HEFCW would like to participate in this work in principle.

Concerns/suggestions

- Clear definitions/approaches are required for quality deemed likely to become/inadequate,
- Introduce arrangements to support institutions where provision is deemed likely to become inadequate;
- HEFCW should provide a detailed explanation in respect to contracting a third party to undertake the listed activities for TNE;
- Restrict the number of routes by which a student can raise concerns, in order to reduce confusion. Approaches should be complementary, rather than duplicate existing mechanisms;
- Clarification of how a new concerns scheme might work is important, and whether it will be sufficiently flexible, yet robust, to support early identification and address potential concerns;
- The purpose of HE should be seen as broader than just gaining employment;
- The terminology and process will need to be defined in greater detail to ensure that the processes are robust and scalable for application across the diversity of the institutions in Wales.

Q13. Are there any other issues which should be considered within Annex A?

Key points

- The Annex provides a comprehensive summary of the overall framework and its operation;
- There might be scope for specific reference to how QA arrangements will apply to Welsh medium provision;

- Recognition that HEFCW has attempted to use existing processes and practices as far as possible to minimise the burden, and request to maintain this approach;
- Concern that approach appears to be more burdensome than that in England;
- The arrangements would need to be kept under review in moving towards implementation.

Q14. Are there any other areas which should be built into the timetable?

Key points

- The timescale is challenging. Institutions would benefit from additional information as soon as possible;
- The timetable should be accessible, and kept updated, including in response to the White Paper and other changes in England and any decision regarding Welsh participation in TEF2;
- Provision of information on the international review work, should also take account of the burden on student representative bodies;
- The developmental period should enable HEFCW to ensure institutions are engaged with the changes to quality assessment.

Annex B.

Issues to be brought to the attention of the UK-wide Standing Committee

Baseline

- There should be a common Quality Assessment Framework across the whole of the UK, which is monitored, in order to maintain a UK-wide approach;
- The impact to the UK HE brand and the Welsh sector of the loss of comparability across the UK achieved under QAA review;
- Maintenance of the reputation of UKHE through areas of comparability and the underlying processes;
- Clarification of the use of other elements of the current UK-wide Quality Code at an early stage, particularly qualifications characteristic statements and subject benchmark statements. This particularly impacts on the proposal for future calibration of standards by subject experts;
- Consideration of the maintenance and development of the Quality Code, as the consistent benchmark for quality in UK higher education;
- Inclusion of the European Standards and Guidelines;
- The use of appropriate metrics to measure quality;
- Student mobility and portability of qualifications;
- Emphasising the use of national credit frameworks (in institutions awarding credit) within the UK-wide work on degree standards.

Quality Assurance processes

- Clarity on whether quality assurance should cover collaborative provision (including internationally);
- Consideration of whether annual monitoring is able effectively to include non-standard groups, including PGTs, PGRs and distance learners, where numbers may be small;
- Consideration of whether the annual monitoring is able effectively to take account of widening access (this may be addressed comprehensively through TEF, which could be the monitoring route);
- Consideration of metrics for high quality teaching (may be addressed effectively through TEF).
- The UK common framework should be clearly communicated, together with its rationale, including the variations by country beneath that overarching framework

Governing body

- Shared approaches to the effective role of Governors to support common approaches to their increased oversight responsibilities;
- Potential for confusion of roles and responsibilities between the governing body (or Council) and Senates or Academic boards, including whether the proposals to place a greater responsibility on governing bodies requires a change to institutions' governance documents;
- The need for more detailed contextualisation of data and reports;

- Implications for the composition of the Board, including the need for additional experience and expertise to ensure appropriate oversight of HE standards and quality;
- The necessity to provide governing bodies with clear guidance and tailored support in respect of their specific responsibilities under the quality assessment framework for Wales and the 2015 Act;
- Training should include representatives from the HEI in order to establish the institutional context;
- Clarification of whether the statements would cover collaborative provision, including internationally;
- Clarification of how many of the statements would be used, and definition of the requirements underpinning the statements;
- whether accuracy of information, compliance with Professional, Statutory, and Regulatory Body requirements and compliance with Competition and Markets Authority guidance should be included within the statements;
- The need for particular support for student members of governing bodies;
- The need for measures to ensure that the governance of higher education institutions is democratic, representative and transparent.

External examiners

- Training for external examiners should take account of existing arrangements across the sector;
- Training should be appropriate, take account of Welsh medium provision, and be available in Welsh;
- Whether the current pool of external examiners is large enough to support the existing structure;
- Management of the risk that enhanced requirements could discourage people from becoming/continuing as, external examiners, including those not employed by HEIs;
- Clarification of whether training will include external examiners for masters and PhDs;
- Clarification regarding funding, the possibility of enhanced fees for External Examiners, and whether the cost would be borne by individual institutions;
- Consideration of whether the Brexit vote might impact on the recruitment of external examiners;
- Consideration of whether the following areas might benefit from clarification:
 - A central code of conduct
 - Work volumes and expectations
 - The remit of external examiners
 - Full recognition of the professional role within examiners' home institutions
 - Developing a 'panel' approach to External Examining to provide an independent, objective and effective approach to ensure standards.

Annex C

Respondents

Aberystwyth University
Bangor University
Cardiff Metropolitan University
Cardiff University
Grŵp Llandrillo Menai
National Union of Students Wales
Open University in Wales
Quality Assurance Agency
Swansea University
University and College Union
University of South Wales
Universities Wales
University of Wales
University of Wales Trinity Saint David
Wrexham Glyndŵr University