

## Cylchlythyr | Circular

# Changes to the Institutional Review: Wales

**Date:** 01 May 2013  
**Reference:** W13/13HE  
**To:** Heads of higher education institutions in Wales  
Principals of directly-funded further education colleges in  
Wales  
**Response by:** 31 July 2013  
**Contact:** Name: Dr Cliona O'Neill  
Telephone: 029 2068 2283  
Email: [cliona.oneill@hefcw.ac.uk](mailto:cliona.oneill@hefcw.ac.uk)  
[steven.williams@hefcw.ac.uk](mailto:steven.williams@hefcw.ac.uk)

The institutional review: Wales checks how effectively institutions manage the quality and standards of their academic provision. This circular provides our principles for institutional review in Wales and invites responses to a consultation on changes to the method in line with these principles.

If you require this document in an alternative accessible format, please telephone us on (029) 2068 2225 or email [info@hefcw.ac.uk](mailto:info@hefcw.ac.uk).



Noddir gan  
**Lywodraeth Cymru**  
Sponsored by  
**Welsh Government**

## Introduction

1. The institutional review: Wales (IRW) checks how effectively institutions manage the quality and standards of their academic provision. This circular provides our vision for institutional review in Wales and invites responses to a consultation on changes to the method in line with our vision.
2. The consultation includes changes to align with the Higher Education Review (HER) in England and Northern Ireland, and also the adoption of some elements of Enhancement-Led Institutional Review (ELIR) in Scotland.
3. Responses are invited by **31 July 2013**.

## Principles

4. Our aim for review in Wales are to have a process that:
  - has a strong focus on partnership and how this enhances the student experience;
  - is robust and drives Welsh institutions to be internationally excellent;
  - is flexible, and can be adapted to the changing higher education context;
  - takes on those aspects of other UK review processes which meet the needs of Wales, but at the same time has a uniquely Welsh identity and reflects the Welsh context.

<b>Q1 Is there anything else which should feed into the principles?</b>
---

## Background

5. The Quality Assurance Agency for Higher Education (QAA) will launch the HER method in 2013/14. This will take the place of Institutional Review of Higher Education Institutions in England and Northern Ireland, and Review of College Higher Education. It may also succeed Integrated Quality and Enhancement Review for further education (FE) colleges in Northern Ireland from 2014/15, and Review for Educational Oversight from January 2014.
6. HEFCW has a statutory responsibility for quality assessment, and the proposals in this consultation help us to meet that responsibility.
7. In July 2012 the Welsh Government published their [Further and Higher Education \(Wales\) Bill](#). This invited responses on Welsh Government's legislative proposals in relation to FE governance and higher education (HE) reform. It also signalled an intention to give HEFCW statutory responsibility for quality enhancement, to include the:

- 'enhancement-specific criteria in the quality assessment process;
  - provision of improved public information about quality, particularly for learners and employers;
  - development of opportunities for a greater voice for student representatives in institutional quality arrangements and/or activities;
  - delivery of specific projects to develop and share good practice and collectively generate ideas and innovative models for encouraging academic staff, support staff and students to share current learning and teaching experiences.'
8. In a [written statement](#) issued in March this year the Minister for Education and Skills indicated that the Welsh Government intended to consult on proposed revisions to the higher education regulatory framework. When issued the consultation will be available on the [Welsh Government's website](#). The proposed changes may have implications for HEFCW's quality assessment duty.
  9. Our [2013-14 remit letter](#) from Welsh Government also has an emphasis on enhancement:  
'The quality and strength of the Welsh HE sector should be at the heart of the Council's quality assessment and enhancement activities with a focus on continuous improvement of teaching and learning ...'
  10. To date there has been an emphasis on maintaining comparability with review methods in England. This is still desirable, and therefore we have looked at changes in the HER in England and Northern Ireland, particularly in relation to outcome judgements, to see where the review method in Wales should be adapted. We intend to maintain the same outcome judgements as in the HER, ie:
    - The institution's threshold standards;
    - The quality of students' learning opportunities;
    - The quality of public information;
    - The institution's enhancement of students' learning opportunities.
  11. Given the steers in the Further and Higher Education (Wales) Bill, and the emphasis which Welsh Government places on quality enhancement more generally, we have also looked particularly at the Enhancement-Led Institutional Review (ELIR) in Scotland, to see how the review process in Wales might be enhanced.
  12. In Wales, the Higher Education Academy (HEA) coordinates the Future Directions work on behalf of the sector. Future Directions encompasses the quality enhancement work being carried out in the Welsh HE sector, which aims to enhance specific areas of the student learning experience through encouraging academic and support staff and students collectively to share current good practice and to generate ideas and models for innovation in learning and teaching.

13. Looking to the future, in the context of proposed changes to HEFCW's regulatory role, and changes which may result from the Further and Higher Education (Wales) Bill and the forthcoming Welsh Government consultation, it is likely that the review method in Wales may need to be adapted further. The rolling process in Wales enables the method to be reviewed on an annual basis, to take account of these developments, and thus gives necessary flexibility and adaptability.
14. HEFCW has produced guidance on student charters ([Circular W11/31HE](#)). This expected all institutions to have a charter in place for 2012/13, which is reviewed annually. We have also produced guidance on good practice on funding of effective, democratic student unions and student representation ([Circular W12/09HE](#)). This includes principles which should underpin the funding of student unions, principles which should underpin the relationship agreement between the student union and the institution; and a common set of core functions which all student unions should provide. These also had to be in place for 2012/13. HEFCW has also collated case studies of good practice on how the student voice contributes to governance ([Circular W13/34HE](#)), which will be published later this year.
15. There may be cost implications to some of the proposed changes, however, we expect institutional subscriptions to the QAA to remain at UK levels.

## **Proposed changes: Students**

### Annual student statement

16. In Wales the production of an Annual Statement by institutions' student unions has been initiated and promoted through the HEFCW-funded National Union of Students (NUS) Wales '[Have your Say](#)' campaign. This enables the student union to produce an overview of the student experience, based on quantitative data such as the National Student Survey and internal survey results; and qualitative data such as feedback from course representatives and from students. It aims to review areas of good practice and opportunities for improvement. It provides a good starting point for dialogue between the student union and the institution, and in making a case for change. It helps to ensure continuity, and to inform the student submission to the institutional review.
17. The QAA has subsequently agreed to fund NUS on a UK basis to promote the production of annual statements by more student unions.
18. HEFCW proposes to make the production of an annual student statement an expectation of student unions. If this is agreed, it will impact on [W12/09HE: Guidance on good practice in funding of effective, democratic student unions, and student representation](#), which we will need to revise.

**Q2 Do you agree that the production of an annual student statement by student unions should be an expectation? If so, are there any unintended consequences of this?**

Strengthening the role of students in review

19. The consultation on the HER proposes enabling students to contribute their views directly to the review team in advance of the review visit. In addition, it proposes to change the recruitment method for student reviewers to enable them to be nominated by recognised student unions, or nominate themselves, as well as be nominated by a higher education provider.

**Q3 Should the proposed changes to recruitment of student reviewers proposed in HER be adopted in Wales?**

**Q4 Are there any other ways in which the role of students in review could be strengthened further?**

**Proposed changes: Increased focus on enhancement**

20. The IRW includes a judgement on ‘the institution's enhancement of students’ learning opportunities.’ However, it does not currently include a reference to institutions’ engagement with the Future Directions quality enhancement themes.
21. The ELIR includes identification of ways in which the student learning experience could be improved, whether or not threshold quality is at risk, as part of the review process. HEFCW proposes that the Self Evaluation Document (SED) should in the future include a section on this. This section would need to be written in partnership with the student body. This could then contribute to the next annual revision of the Student Charter.
22. HEFCW proposes that the review includes a specific comment on institutions’ engagement with the Future Directions quality enhancement themes.

**Q5 Are there any unintended consequences of including an additional comment on the institution’s engagement with the Future Directions quality enhancement themes?**

**Q6 Are there any unintended consequences of including identification of ways in which the student learning experience could be improved within the SED?**

## Proposed changes: Internationalisation

### Transnational education arrangements

23. As part of our Corporate Strategy 2013-14 to 2015-16, HEFCW is committed to monitoring Transnational Education (TNE) arrangements in Wales. To enable us to do this we propose asking the QAA to collect the data from individual institutions' collaborative registers on an annual basis, as they would do prior to an institutional review, and to report back to HEFCW.

**Q7 Do you agree the proposal to ask the QAA to collect data on transnational education arrangements from individual institutions' collaborative registers on an annual basis? If not, please suggest an alternative way of collecting information on TNE partnerships.**

### Including a specific comment on the institution's approach to internationalisation

24. The Welsh Government is placing increasing emphasis on Wales having 'world class' institutions and provision, including through HEFCW's 2013-14 remit letter, 'The Council's priority should be to achieve a world-class higher education system and to work collaboratively with the sector to achieve this.'
25. ELIR in Scotland explores a number of dimensions of the institution's approach to internationalisation including student recruitment, the student experience, and the curriculum. International comparability is achieved through:
- institutions' use of international reference points in formulating and evaluating strategy and practice;
  - national Enhancement Themes drawing on international practice;
  - including an international reviewer on each ELIR team.
26. The IRW handbook notes that 'Review teams may also wish to enquire into the ways in which an institution has considered the expectations of the *Standards and Guidelines for Quality Assurance in Higher Education in the European Higher Education Area* and any other guidance relating to European or other international practices, such as the European Credit Transfer System and the Framework for Qualifications of the European Higher Education Area. While the Quality Code and other UK reference points are considered to subsume the expectations and good practice of Part 1 of the *Standards and Guidelines*, institutions that have collaborative links with non-UK European institutions or a particular focus on internationalisation may find it useful to articulate in greater detail their engagement with European reference points.'

27. HEFCW proposes strengthening this area of the IRW to include a specific comment on the institution's approach to internationalisation. This could be achieved through each review exploring aspects of the approach, including student recruitment, the student experience, and the curriculum. The inclusion of an international member on the review team will help in addressing this area. This will help to drive Welsh institutions to be internationally excellent, as stated in our principles.

**Q8 Are there any unintended consequences of requiring a comment on the institution's approach to internationalisation?**

International reviewers

28. It is proposed to introduce international reviewers on a pilot basis in HER in 2013/14 and 2014/15. The recruitment criteria will be similar to those for UK reviewers and the reviewers, who may be staff or students from European institutions, and will be fully trained to mitigate the risk of unfamiliarity with UK processes. They will be full team members, and will replace one of the current team members. It is likely that, following the pilot, international reviewers will be introduced on a permanent basis.
29. In Scotland international members of review teams have been used for a number of years. These members are senior peers from appropriate higher education institutions or related agencies and are selected with the aim of achieving a suitable match to the strategic approach and enhancement priorities of the institution. They need a range of knowledge and experience which will benefit the institution, the review process, and the wider Scottish higher education sector.
30. International reviewers are provided with background materials in advance of training, to familiarise them with the higher education system, UK Quality Code, etc. They are also provided with an induction meeting with QAA Scotland immediately prior to ELIR training. In addition to the usual reviewer attributes, they are required to have:
- current or recent wide experience of academic management at institutional level outside the UK, preferably relating to quality assurance and enhancement of the student learning experience;
  - current or recent experience of external review of HE institutions outside the UK;
  - expertise in the development of good practice in learning and teaching, and the wider student experience (preferably at international level);
  - knowledge and experience of practice in a minimum of one country in addition to the UK;
  - an awareness of the distinctive features of the Scottish higher education system in general, and particularly ELIR.
31. Feedback in Scotland has concluded that these reviewers make a positive contribution to the review process, bringing a wider (although not always *international* as such) perspective to the team, and enabling 'norms' to be

questioned. An evaluation of the use of international reviewers has suggested that the international aspect of the role should be developed (eg focussing on institutional internationalisation strategies, the international student experience), and that the appointment should be guided by the expertise needed in the review team, and the enhancement agenda of the institution.

32. Given the positive feedback regarding the contribution of international reviewers in ELIR, HEFCW proposes to use international reviewers from 2014/15. We propose that these should be senior peers from appropriate higher education institutions or related agencies. Inclusion of international reviewers on review teams will also facilitate the inclusion of an additional comment on the institution's approach to internationalisation.
33. HEFCW proposes to ask the QAA to consider how this may be done in as cost effective a means as possible, but without necessarily restricting reviewers to other European countries. Currently the IRW team consists of four reviewers (one of whom is a student) and a review secretary, whereas the ELIR team consists of six reviewers.

**Q9 Are there any unintended consequences of including an international reviewer on the review team?**

**Q10 Should the international reviewer be an additional reviewer or replace one of the current team members?**

#### Four year review interval

34. In England and Northern Ireland it is proposed that the interval between reviews is six years for providers who have had two or more successful reviews by QAA. Providers who have not had two or more successful reviews by QAA and/or whose last review by QAA was unsuccessful will be reviewed four years after their last engagement with QAA.
35. In Scotland a four year cycle is operated. This aligns with the typical four year duration of a degree in that country, and provides every student with the opportunity to contribute to/benefit from institutional review during their undergraduate studies.
36. HEFCW proposes moving to a four year review interval in Wales. This will have the following benefits:
  - More students will have the opportunity to engage with review;
  - It will benefit all students, as full-time undergraduates will know that their institution will be reviewed either just before they arrive at the institution, or during their degree;
  - There will be no need for a mid-process review, which would reduce burden on institutions;
  - It will have reputational benefits for Wales, in being able to demonstrate regular and robust review;

- It will align Wales with Scotland, which has a strong focus on student engagement and partnership;
  - It will appear more robust to international audiences than the HER;
  - It will address Ministerial concerns about ensuring that institutional review is more robust;
  - It will enable earlier consideration of risks arising from fluctuation in the sector, in the context of mergers, changes to HE fees and funding, fluctuation in student numbers etc;
  - It will reflect the changes to the structure of the sector, with fewer institutions meaning that a more even spread of institutional reviews could be achieved, with no gap years.
37. HEFCW is mindful of the desire of the sector to maintain comparability with HER, and therefore proposes to retain the same judgements, subject to other proposed amendments which are included in this consultation.

**Q11 Are there any unintended consequences of moving to a four year cycle?**

### **Proposed changes: Review**

#### Self-evaluation document

38. The purpose of the SED in the IRW is to provide the review team with an account of how the institution meets the expectations set out in the quality code. The SED in the HER has a similar function.
39. In the ELIR an evidence-based reflective analysis (RA) is used in place of the SED. Students are expected to be involved in preparing the RA, and the nature and impact of that involvement should be detailed within the text. The institution identifies what it hopes to achieve from the ELIR, in particular, aspects of its strategic intentions or their implementation on which it would particularly welcome the ELIR team's view. Institutions also provide reflective and evidence-based case studies which illustrate the institution's approach to self-evaluation and/or the effectiveness of its management of change.

**Q12 Should the self-evaluation document take on any aspects of the reflective analysis? If so, which ones?**

#### Thematic element

40. The HER includes a thematic element, which is not subject to judgement. This enables the review process to look at issues attracting public interest or concern at the time of the review. The aim is to help providers enhance their response to those issues, either by recommendations for improvement or identifying examples of good practice.

41. ELIR has a visit in two parts. Part 1 involves the ELIR team meeting for a day to consider matters arising from the RA, case studies, and other advance information, followed by a two day visit to the institution. The programme for the first day is determined by the institution, and is designed to illustrate its approach to enhancing quality and securing academic standards. The programme for the second day involves meetings to explore agendas developed by the review team. At the end of this visit the team will share with the institution the institution-specific themes to be explored during Part 2, a draft programme for the Part 2 visit, and a list of any further documentation requested. The Part 2 visit lasts 3-5 days, depending on the institution-specific themes emerging from the RA and the Part 1 visit. Although the team may pursue matters relating to quality and standards, the visit is intended to be enhancement-led. The judgement in ELIR is on the institution's current, and likely future, management of the academic standards of its awards and the quality of the student learning experience it provides.
42. The IRW does not include any sector-wide themes, given the small size of the sector, as insufficient information on a theme to benefit the sector as a whole would be generated in any one year. The review process includes a first team visit, lasting one and a half days, six weeks before the review visit. This enables the team to discuss the commentaries it has produced, decide on issues arising, additional documentation needed and a programme for the visit. The second review visit normally takes five days. Wales therefore already has a two part visit, similar to ELIR.

<b>Q13 Should an institution-specific theme(s) be part of the review process?</b>
---

#### Partnership as a review focus

43. HEFCW is working with NUS Wales and Higher Education Wales to develop a statement of partnership. It is hoped that the sector organisations participating in [Wales Initiative for Student Engagement \(WISE\)](#) will sign up to this statement. An increased focus on partnership in the review process would help to embed the statement in Welsh institutions. It also links with the developments in on student charters, funding of effective, democratic student unions and student representation, and student voice in governance in Wales.
44. In ELIR the effectiveness of student engagement is a significant focus of the review. This has two main aspects: the learning opportunities the institution provides for its students (which is already covered by a review judgement in Wales); and the extent to which students are engaged with the management of quality and are therefore able to act in partnership with the institution in its effective management of the student learning experience. ELIR also considers how effectively the institution manages the equality and diversity of the student body, including arrangements for identifying and responding to student needs.

45. A focus on partnership would
- provide a uniquely Welsh dimension to the review process;
  - reflect Welsh priorities and the Welsh context; and
  - emphasise the importance of WISE;
  - emphasise the importance of student charters;
  - link to the work on student union funding.

<b>Q14 Should there be an increased focus on partnership in the review process?</b>
---

Follow-up action

46. In HER the follow-up includes an institutional action plan and reporting on this. There is an additional programme of follow-up activity where an institution has received one or more judgements of requires improvement to meet UK expectations/does not meet UK expectations, to address the area(s) of the review relating to those judgements. There is no mid-process follow-up process.
47. The follow-up from ELIR includes:
- an institutional report one year after the publication of the review report;
  - an event at which institutions share the approaches they have taken to address the ELIR outcomes;
  - greater emphasis on student engagement during the annual discussions between QAA Scotland officers and each institution.
48. In Wales the QAA pays an annual visit to each institution. In addition, the follow-up includes:
- An institutional action plan addressing recommendations and affirmations, and giving any plans to capitalise on the identified good practice;
  - a mid-process follow-up process, where the institution reports on its action plan to QAA.
- An additional programme of follow-up activity is implemented where an institution has received one or more judgements of requires improvement to meet UK expectations/does not meet UK expectations, to address the area(s) of the review relating to those judgements.
49. In Wales the report on the action plan takes the place of the institutional report one year after the publication of the ELIR review outcomes in Scotland. It is therefore not proposed that an additional institutional report be introduced in Wales.
50. HEFCW proposes that the QAA's annual visit to each institution be enhanced to include greater engagement with students, including ensuring student representatives are present for meetings and that the agendas include issues relevant to student interests.

51. It is not proposed that a separate follow-up event be implemented for Wales. However, it is important that aspects of reviews, and institutions' responses to their review outcomes and recommendations, which are related to the current quality enhancement theme feed into the ongoing Future Directions work and the biennial conference. This could be institution-led and/or QAA-led.

**Q15 Are there any unintended consequences of the QAA's annual visit to institutions including greater student engagement?**

**Q16 How could the outcomes of reviews best be fed into the Future Directions biennial conference, and ongoing Future Directions work?**

Strengthening the emphasis on teaching qualifications

52. Many institutions in Wales have set themselves challenging targets in relation to the UK Professional Standards Framework (UKPSF), and a number of institutions have had, or are in the process of having, their continuing professional development frameworks accredited by the HEA. This is therefore an area where Wales could excel, and which could be used to promote Wales as a place to learn. This information will be captured by HESA from 2012/13, and is likely to be of interest to prospective and current students.
53. The IRW handbook currently notes that 'Review teams may wish to take into account the UKPSF for teaching and supporting learning in higher education, which has been developed by the sector for higher education institutions to apply to their professional development programmes and activities. Review teams may also wish to consider the extent to which the higher education institution makes use of the services offered by the Higher Education Academy (HEA) to support the development of professional standards.'
54. HEFCW proposes strengthening this to require a comment on the institution's engagement with the UKPSF. This is a minor change, but we would welcome consideration of any unintended consequences of this.

**Q17 Are there any unintended consequences of requiring a comment on the institution's engagement with the UKPSF?**

## Proposed changes: judgements

### A judgement of 'requires improvement to meet UK expectations in the area of threshold academic standards

55. The HER consultation in England included this proposal, which arose from the difficulties presented by the pass/fail judgement in threshold academic standards in cases where:
- moderate risks to academic standards exist, which may lead to serious problems over time;
  - problems are confined to a relatively small part of the whole provision; plans that the provider presents for addressing identified problems are under-developed or not fully embedded;
  - the provider's priorities or recent actions suggest that it may not be fully aware of the significance of certain factors.
56. In these cases it may be inaccurate to judge academic standards as wholly meeting UK expectations, yet equally inaccurate to judge them as completely failing to do so.
57. If this change is made to the review judgements for England and Northern Ireland, it is desirable to also make the change to the judgements for Wales, in order to maintain comparability with other countries of the UK.

**Q18 If a judgement of 'requires improvement to meet UK expectations' is agreed for threshold academic standards in England and Northern Ireland, are you in agreement for this judgement to be available for Wales?**

### A separate judgement about managing higher education provision with others

58. The basis of the consultation on the HER is that it is possible that different outcomes might result from the provision delivered and supported entirely by the provider itself, and that offered through arrangements with others. In the IRW, the review judgements can be differentiated so that they may apply only to collaborative provision or on-campus provision, or to provision at a certain level.
59. A separate judgement would provide greater clarity and transparency about this area of activity, which has resulted in more concerns and unfavourable review outcomes than home provision. The wording would be the same as the criteria for the judgements in learning opportunities, information and enhancement. However, the adoption of a separate judgement for this area risks isolating, and giving undue prominence to, this area of activity which, for many providers, is less significant in terms of student numbers than other areas. In addition, having a separate judgement is not in line with *Chapter B10: Managing higher education provision with others* of the Quality Code, which seeks to emphasise and

encourage the integration of the management of this activity with home provision.

60. There are advantages and disadvantages to having a separate judgement. However, if a separate judgement is introduced in England and Northern Ireland, it would be desirable to maintain comparability, and therefore the change should also be introduced in Wales.

**Q19 If a separate judgement is introduced for collaborative provision in England and Northern Ireland, are you content for this change to be introduced for Wales?**

### **Proposed changes: Collaborative provision**

#### Replacing hybrid and separate collaborative provision reviews with a common review method of varying intensity

61. In the HER hybrid and separate collaborative provision reviews will be replaced with a common review method, varying in intensity depending on the complexity of provision. A desk-based initial appraisal will be used to determine the intensity of the review visit, and will replace the initial visit to the institution. The ELIR includes collaborative provision as part of the review. In some cases the collaborative partner receives a review in its own right.
62. HEFCW proposes to retain the initial visit, as described in para 42, but to replace hybrid and separate collaborative provision reviews with a common review method of varying intensity. More complex provision could be reviewed by a larger team and/or through a longer review visit.

**Q20 Do you agree that hybrid and separate collaborative provision reviews should be replaced with a single review method of varying intensity, depending on the size and complexity of collaborative provision?**

#### Demarcation between the areas reviewed at a degree-awarding body and those reviewed at a partner, delivery or support organisation

63. The parameters of the review of arrangements for working with others vary depending on whether partner, delivery or support organisations are also reviewed by QAA. In the HER, where these partners are subject to regular QAA review, it is proposed that the review of the awarding organisation will be limited to the management of the arrangement by that provider, and to the setting and maintenance of academic standards. The reviewers will not consider the quality of learning opportunities, information and enhancement where there is other QAA review evidence available.

64. Where partner, delivery or support organisations are not subject to regular QAA review (eg if they are outside the UK), the review of arrangements for working together will consider all four core areas: academic standards, quality of learning opportunities, information and enhancement.
65. The QAA is also revising its approach to reviewing UK providers' partnership links with organisations abroad, and programmes offered by UK providers on overseas campuses, and envisages more sharing of information between that process and review processes. This is important to safeguard the reputation of UK higher education internationally.
66. HEFCW considers that this approach would be pragmatic and appropriate, and that should it be adopted in England and Northern Ireland, it would be sensible to introduce it in Wales also.

**Q21 If proposals for demarcating areas reviewed at a degree awarding body and those reviewed at a partner, delivery or support organisation are adopted in HER, are you in agreement for them to be adopted for Wales?**

#### **Proposed changes: The name of the review process**

67. Given the substantial changes proposed to the review process for Wales, and the proposals that the review takes account of good practices in Scotland, it may be appropriate to change the name of the process. This would help to emphasise how the process is distinct to that in the other countries of the UK.

**Q22 Should the name of the review process be changed? If so, do you have any suggestions?**

#### **Proposed changes: Requiring directly funded FEIs to subscribe to the QAA**

68. All HEIs in Wales, as part of their Higher Education Wales membership, undertake to subscribe to the QAA. Their subscriptions contribute to the costs of the QAA's activities in Wales, including the costs of reviews.
69. Currently HEFCW pays the costs of review of further education institutions with directly funded higher education provision, as appropriate. These institutions are not currently required to subscribe to the QAA.
70. From 2014/15 further education institutions with directly funded higher education provision will be required to subscribe to the QAA, in order that they contribute towards the cost of their review. This mirrors developments in England, where directly funded FEIs will be expected to subscribe from 2013/14.

**Q23 Are there any unintended consequences of requiring further education institutions with directly funded higher education provision to subscribe to the QAA?**

**Responses to**

71. Please provide your responses to Steve Williams, [steven.williams@hefcw.ac.uk](mailto:steven.williams@hefcw.ac.uk), by 31 July 2013.

**Assessing the impact of our policies OR Equality and diversity implications**

72. We will be carrying out an equality impact assessment to help safeguard against discrimination and promote equality. We will also consider the impact of policies on the Welsh language, and Welsh language provision within the HE sector in Wales. Contact [equality@hefcw.ac.uk](mailto:equality@hefcw.ac.uk) for more information about EIAs.