

Cylchlythyr | Circular

Outcomes of consultation on Changes to the Institutional Review: Wales

Date: 13 November 2013
Reference: W13/36HE
To: Heads of higher education institutions in Wales
Principals of directly-funded further education colleges in Wales
Response by: No response required
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This circular provides the outcomes of the consultation provided in circular [W13/13HE: Changes to the Institutional Review: Wales](#). We will make recommendations to the QAA in accordance with these outcomes.

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Introduction

1. This circular provides the outcomes of the consultation provided in circular [W13/13HE: Changes to the Institutional Review: Wales](#). We will make recommendations to the QAA in accordance with these outcomes.

Background

2. The institutional review: Wales (IRW) is the review method for higher education institutions in Wales. It is used to check how effectively institutions manage the quality and standards of their academic provision.
3. The Quality Assurance Agency (QAA) launched the Higher Education Review (HER) method for England and Northern Ireland in 2013/14. This takes 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 colleges in Northern Ireland from 2014/15, and Review for Educational Oversight from January 2014.
4. The Quality Assessment and Enhancement Subgroup (QAESG) is a subgroup of HEFCW's Student Experience, Teaching and Quality Committee, and advises on HEFCW's statutory responsibilities relating to quality assessment. The March 2013 QAESG meeting discussed proposed changes to the IRW, to inform the publication of circular [W13/13HE: Changes to the Institutional Review: Wales](#). QAESG has also advised on the outcomes of this consultation.
5. There were 15 responses to the consultation of which eight were higher education institutions (HEI), one was a further education institution (FEI), two were institutional student unions (SU) and four were from organisations within the higher education (HE) sector. The list of respondents is available at **Annex A**, together with a more detailed summary of the responses.

Outcomes of the consultation

6. Each of the areas within the consultation is addressed separately below.

Q1 Is there anything else which should feed into the principles?

7. A number of points were made, and we have updated the principles as follows:

Our aims for review in Wales are to have a process that:

- *assures quality and academic standards;*
- *is robust and drives Welsh institutions to be internationally excellent;*

- *has a strong focus on partnership and how this enhances the student experience;*
- *is flexible, and can be adapted to the changing higher education context;*
- *considers the Welsh sector within the context of the UK HE system, taking on those aspects of other UK review processes which meet the needs of Wales, but having a uniquely Welsh identity and reflecting the Welsh context.*

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?

8. All respondents agreed that the annual student statement would bring benefits. There were some queries regarding HEFCW's ability to expect SUs to produce an annual statement. There was some misunderstanding regarding whether or not the statement should be provided to the QAA annually (this is not the intention). A number of points were made regarding the ability of SUs to resource the production of the statement.
9. As a result of the consultation, we will update [Circular W11/46HE: Guidance on good practice in funding of effective, democratic student unions, and student representation](#) to place an expectation on institutions to resource the SU sufficiently to enable them to produce an annual student statement, should the SU choose to do so. Within this guidance, a core function of the student union is to represent the full and diverse range of its student members, ie part-time, full-time, international, European, UK, postgraduate, undergraduate, franchise, mature and non-traditional students, students with protected characteristics, students undertaking higher education through the medium of Welsh, or wishing to receive Welsh language services and communications.
10. The statement will be an internal document to form the basis of dialogue between the institution and SU, and inform the development of the student submission to the review. We had previously agreed to support '[Have your Say](#)' to 2013/14 and we have recently agreed to fund [Wise Wales](#) from 2014/15 for a period of three years, with the possibility of extension for a further three years. Funding from 2014/15 is conditional upon matched funding being provided for Wise Wales from the sector. Wise Wales will provide support to all SUs in Wales who wish to produce annual statements.

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

11. The handbook for HER 2013 detailed that the lead student representative (LSR) would be decided by the student representative body, with students being able to be nominated by their recognised student representative body, or to volunteer themselves in the event there was no such body. The

role of the LSR could be undertaken either jointly or by a team. Should a LSR not be identified then an online tool may be made available for students to contact the review team with their views directly. The consensus was that these changes should be adopted in Wales. However, concerns were raised regarding ensuring that any student reviewer or LSR appointed was in good standing¹.

12. We will ask the QAA to ensure that the changes to recruitment of student reviewers for the HER are adopted in Wales, and to make it clear in the appointments process that a reference from the student's home institution will be required.

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

13. It would be helpful to have formal involvement of students, probably via the SU, involved in processes subsequent to completion of the review (eg development of the action plan). The HER has included an expectation that the lead student representative is included in the development of the institutional action plan (and follow-up action plan, where applicable).
14. We will ask the QAA to ensure that students in Wales are formally involved in processes subsequent to completion of the review.

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

15. An additional comment on the institution's engagement with the Future Directions quality enhancement themes should be included in the review report. We will also ask the QAA to take account of comments raised regarding specific institutional enhancement activities which are not included in the Future Direction themes.

Q6 Are there any unintended consequences of including identification of ways in which the student learning experience could be improved within the Self Evaluation Document (SED)?

16. A number of unintended consequences were identified by respondents. QAESG advised that this aspect would be addressed through the judgement on quality enhancement. On this basis, we do not propose that identification of ways in which the student learning experience could be improved should be included in the SED.

¹ ie had not been found to have engaged in academic misconduct, and was up to date with any payments due to the institution

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.

17. This proposal was made as a consequence of HEFCW's Corporate Strategy 2013-14 to 2015-16, which notes that HEFCW will monitor data on transnational education (TNE) arrangements. The consensus was that it would not be helpful for the QAA to collect this data on behalf of HEFCW.
18. We are currently using the Higher Education Statistics Agency (HESA) Aggregate Offshore record definition for TNE, which is 'students studying (to date) wholly outside the UK who are either registered with the reporting institution or who are studying for an award of the reporting institution.' We understand that UK wide discussions are taking place about the collection of TNE data. As part of this, we will liaise with the UK Higher Education International Unit, the QAA and HESA, in their explorations of the potential to disaggregate information currently collected in the aggregate offshore record, and we will be requesting changes to the record for 2015/16 to reflect these discussions.
19. In order to satisfy the expectations of our Corporate Strategy, we may seek further breakdown of 2013/14 data through sources other than HESA.

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

20. A number of issues were raised in response to this question. One respondent suggested that it would be better to include an evaluation of where an institution considers it has areas that are 'world class' in the SED and another that additional tasks could detract from the ability of the review team to make judgements. However, given the importance of this area, and that it is a priority in the Welsh Government's Policy Statement on Higher Education, it is appropriate to include a comment on this area in the review report. QAESG advised that this comment could incorporate consideration of internationalisation strategies and outward student mobility. We will ask the QAA to consider issues raised by respondents in integrating this comment into the review method.

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

21. There was a slight majority in favour of including an international reviewer on the review team. In England and Northern Ireland the use of international reviewers is being piloted in the first instance, in 2013/14 and 2014/15, in order to enable more detailed consideration of the benefits and risks. These reviewers will be invited to contribute to the development of a detailed proposal on the best way to involve international reviewers. Given feedback from the consultation, we propose to learn lessons from the pilot process in England and Northern Ireland. Following this, international

reviewers will be included in the review process in Wales. We expect that they will have an appropriate understanding of UK higher education, including equalities legislation, and will receive training on the Welsh context, including the use of the Welsh language.

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

22. The majority of respondents considered that the international reviewers should be in addition to the current team. Therefore when international reviewers are introduced to review teams in Wales, subject to the outcomes of the pilot in England and Northern Ireland, we propose that they will be additional to the current team composition.

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

23. We still consider that a four year interval between reviews would be optimum. However, the majority of responses were not supportive of this move. In considering carefully the responses to this question, we therefore agree to the proposal put forward by Higher Education Wales and other respondents, 'to retain a lighter touch mid cycle review that would provide HEFCW with the assurances it seeks plus allow students the opportunity to interact at the mid cycle stage.'
24. Following discussion with QAESG, we propose to develop a new mid process developmental engagement, to be known as a student-focussed engagement, which meets our needs, while minimising the burden on institutions. As in the existing mid review follow up process, it will be carried out by QAA officers, act as a health check on how institutions are progressing since their previous review, and include provision for a further visit if the report indicates the existence of potentially serious difficulties. It will commence with a meeting with the recognised student representative body, and will consider student statements produced since the last review, if available, or will address the same issues via discussions if no annual statements are available. This approach will enable students to engage with either a review or a student-focussed engagement during the period of a three year undergraduate degree. It will result in an unpublished report to be provided to HEFCW and the institution involved, in the same way as the current mid review follow up.
25. The current risk-based approach will be maintained, with six years between reviews for institutions which received 'met' or 'commended' outcome judgements; four years between reviews for any institution receiving one or more 'partly met' outcomes; and two years between reviews for any institution receiving any 'not met' outcome.

Q12 Should the SED take on any aspects of the reflective analysis? If so, which ones?

26. The majority of responses were in favour of, or did not object to, the SED taking on aspects of the reflective analysis. However, there was no consensus regarding elements which should be adopted. We will ask the QAA to emphasise the importance of reflective analysis within the SED guidance.

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

27. The consensus was that an institution-specific theme should not be part of the review process

Q14 Should there be an increased focus on partnership in the review process?

28. The majority of responses were in favour of, or had no objection to, an increased focus on student partnership. Currently reviewers make judgements about partnership based on the Quality Code *Chapter B5: Student engagement*, which includes the expectation that: 'Higher education providers take deliberate steps to engage all students, individually and collectively, as partners in the assurance and enhancement of their educational experience.'
29. The Wise Wales partners are in the process of agreeing a statement on student partnership. This sets out what we believe student partnership to be, and what we will do to achieve it. We will ask the QAA to take account of this statement in the review handbook, to inform the focus on student partnership as it is considered within the review process.

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

30. The consensus was that this would be a positive development. We will therefore ask the QAA to ensure that its annual visit to institutions includes greater student engagement, via the recognised student representative body.

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

31. Responses noted the quality assessment work of the QAA, and the importance of recognising the distinction between this and the quality enhancement activities of Future Directions. We will ask the QAA and the Higher Education Academy (HEA) to continue to liaise in order to ensure that good practice identified in response to reviews is fed effectively into Future Directions, and to plan activities as appropriate to disseminate such practice.

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

32. The consensus was that a comment on the UK Professional Standards Framework should be introduced. This should not take the form of a target at this time, and would need to be addressed appropriately in reviewer training.

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?

33. The consensus was that this judgement should be made available for Wales in order to achieve comparability with other countries of the UK. This has now been adopted in England and Northern Ireland, and we therefore recommend that a judgement of 'requires improvement to meet UK expectations' be introduced for the judgement on threshold academic standards.
34. In addition, the wording of the judgement in this area is also subject to amendment. Provided the principles underpinning the judgement remain the same, we propose that the wording be adapted to align with the final version agreed for England and Northern Ireland, in order to maintain comparability of judgements.

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?

35. This judgement has not been introduced in England and Northern Ireland, and therefore we do not propose that the judgement be introduced for Wales.

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?

36. The consensus was 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. We will therefore ask the QAA to make this change. Unlike the HER, Wales will retain a first team visit to the institution.

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?

37. The consensus was that this should be adopted for Wales if this change was made in HER. This has now been adopted in the HER so this will be mirrored in Wales.

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

38. There were mixed responses to this question, ranging from responses that the name should remain the same, to that there should be a single name for institutional review across the whole of the UK. Alternative names suggested included:
- Developmental institutional review: Wales;
 - Welsh Higher Education Review (WHER);
 - Partnership and Enhancement-led Review Wales;
 - Higher Education Review Wales;
 - Higher Education Enhancement Review Wales.
39. QAESG advised that the name of the revised method should be Higher Education Review Wales. We will ask the QAA to adopt the new name for the process.

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

40. No unintended consequences, other than the cost implications for directly funded FEIs, were identified. We therefore intend to require further education institutions with directly funded HE provision to subscribe to the QAA from 2014/15.

Further information / responses to

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

Assessing the impact of our policies

We have carried out an equality impact assessment (EIA) screening to help safeguard against discrimination and promote equality. We also considered the impact of policies on the Welsh language, and Welsh language provision within the HE sector in Wales. Contact equality@hefcw.ac.uk for more information about EIAs.

**Responses to the Changes to the Institutional Review: Wales (IRW)
consultation**

There were 15 responses to the consultation of which eight were higher education institutions (HEI), one was a further education institution (FEI), two were institutional students' unions (SU) and four were from organisations within the higher education (HE) sector. The list of respondents is available at **Appendix A**.

Q 1 – Is there anything else which should feed into the principles?

Responses noted that:

- the focus on partnership was welcomed;
- the Welsh sector needed to be considered within the context of the UK HE sector and internationally;
- educational quality or quality of academic standards should be included within the principles;
- revisions needed to be transparent and clearly articulated to universities and build upon the existing revised method for institutional review;
- regional collaboration; further education (FE) in FE partnerships; and partnerships via Employers, Sector Skills Councils and Professional Bodies should be considered within the principles;
- there was a concern over implementing change mid-cycle if the cycle was reduced to a four year programme and that benchmarking and comparability should be encouraged;
- a Welsh vision should define itself, not take pieces from other review processes.

Q 2 – 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?

In favour / do not object to an annual student statement by student unions – 15

Objections that this should be an expectation on SUs – 7 (including all student representative bodies)

Responses noted that:

- HEFCW might not be able to impose an expectation on an SU due to their separate constitutional status from institutions;
- student representatives believed the expectation should be on the institution to enable the SU to complete this and that guidance on the funding of SUs should be changed to reflect this;
- the statement should be built on dialogue of the SU-university relationship and imposing an expectation on SUs to complete one annually should not disrupt this;
- there needed to be greater clarity on the format and the purpose of the statement, who would collect it and how, and what it meant for an SU to have expectations placed on them when it was the institutions that were the subject of the review;

- some SUs were not in a position to produce a report so it was important they had additional resources to do this. Support for this could come from institutions and through Wise;
- SUs of partner institutions should be fed into the home institution's response;
- concerns that non-traditional students might not be fully represented in this process;
- students might not respond if told they had to produce a statement;
- it should be implemented with national themes for consistency and comparison;
- the statements should be internal documents rather than submitted on an annual basis to the Quality Assurance Agency (QAA) and HEFCW, and would be better served feeding into internal procedures which could be taken into consideration when a student submission was made to the IRW;
- submitting an annual report annually to the QAA would require institutions to submit a response to the statement and in effect create an annual institutional review;
- it was not clear what the document would be used for and this could lead to uncoordinated activity between universities and the QAA;
- it might highlight short term issues that would lead to reactive measures rather than strategic responses;
- it was not clear how this would make students more active partners in learning.

Q 3 – Should the proposed changes to recruitment of student reviewers proposed in HER be adopted in Wales?

In favour / do not object – 11

Objected – 1

Not clear it would achieve objective - 2

Responses noted that:

- they were not sure this would strengthen the role as students were already full members of review teams;
- it should be managed through the SU and the established processes of consulting with students;
- the written submission was sufficient and introducing this approach could reduce the value of the annual statement and could create another layer of hierarchy in the SU which would be unnecessary;
- it was difficult to see how this could be achieved from a practical perspective and as such there would need to be caution against involving student for the sake of it and ensure that students were involved in a structured and meaningful way;
- there would also need to be consideration given to the possibility that some SUs would not have the resources to achieve this;
- it must include HE in FE representation;
- the institution should have to verify that the student was of good standing;
- individual should be able to nominate themselves as well as the SU and the institution;
- there must be clear and detailed criteria of the role, and formal interviews should be carried out if it was a paid role;
- the QAA should review the appointment and selection process.

Q 4 – Are there any other ways in which the role of students in review could be strengthened further?

Responses noted that:

- students should be treated as equal partners by all panellists;
- the annual student statement was sufficient as it should be a thorough reflection of the student experience and make a valuable contribution to the review;
- their current involvement was comprehensive;
- it was important that the annual statement included the views of the diverse range of students;
- there were concerns regarding students contacting the review team directly, as this could lead to a diffusion of the student voice, or provide an opportunity for previously resolved complaints and grievances to be raised again;
- students could contact the review team through an online tool if an SU did not have a student submission or a lead representative;
- with appropriate training, students should be in the position to select a theme rather than the QAA;
- students could be involved in the process after the QAA review had been completed, such as a formal role in the drafting of the action plan.

Q 5 – Are there any unintended consequences of including an additional comment on the institution’s engagement with the Future Directions quality enhancement themes?

Responses noted that:

- it was important that quality enhancement activities other than the Future Directions themes were not overlooked;
- HEFCW might wish to consider the method adopted by the Enhancement-Led Institutional Review (ELIR) in Scotland where institutions were encouraged to engage with the enhancement themes under a broader section that concerned the enhancement of learning and teaching, but were given autonomy as to how they engage;
- it was crucial that the sense of ownership within the sector wasn’t lost and as a result any review requirements should not be prescriptive;
- engagement and dialogue might improve but that did not always lead to a set of student outcomes;
- measuring this engagement might prove difficult;
- it was important that review teams were briefed on the context of enhancement themes and how they were applied in Wales;
- as an element of the review would be dependent on institutions’ engagement with the Future Directions theme then the comment would need to be handled carefully;
- it was important to understand the sustainability of Future Directions if it was going to be linked to the IRW to save further changes in the future.

Q 6 – Are there any unintended consequences of including identification of ways in which the student learning experience could be improved within the SED?

Responses noted that:

- the expectation of the respondent was that this happened already;
- it was important that it should be written in partnership with the student body;
- it was not clear that the self-evaluation document (SED) was the best place for identifying ways in which the student experience could be improved;
- it was not clear why this would be included as this would stretch the review team even further and the SED was already a reflective document;
- headline themes which allowed for specific course and subject level initiatives to develop would meet the learners' best interests;
- to help institutions focus on quality enhancement an SED template might be beneficial;
- identifying improvement of learning experiences was not the benchmark but whether those methods were put into action;
- there was a judgement on quality enhancement in place. Consequently this proposal would jeopardise the opportunity for institutions to be commended on that judgement;
- when training the reviewers it was important the nature of the comments or judgements that review teams could make were clear.

Q 7 – 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.

In favour / did not object: 2

Not in favour / offered alternative method: 10

No response: 3

Responses noted that:

- including it on the collaborative register, which HEFCW and QAA already had access to, was sufficient.
- separate data collection by institutions could divert resources away from other important areas so HEFCW should consider data from public documents;
- it was more appropriate to produce this just for the IRW;
- there was no value in doing this as intakes and timings of intakes varied across the sector;
- QAA involvement and an annual collection gave the impression that HEFCW regarded this area as a priori risk;
- it was not the role of the QAA to collect data;
- a number of responses suggested that data should be provided to HEFCW through a report or template on an annual basis and the QAA could be involved in the process of developing the report or template;
- the information would be checked by the institution on an annual basis so it was not an issue;
- it was difficult to comment without knowing exactly what data the QAA would collect;
- there should be a minimum number of international students for it to be a requirement.

Q 8 – Are there any unintended consequences of requiring a comment on the institution’s approach to internationalisation?

Responses noted that:

- there were concerns that additional tasks could detract from the ability of the review team to make judgements on academic quality and standards;
- consideration should be given to international comparability being the term used rather than world class to allow for a basket of measures against which to benchmark;
- the benefits of this proposal were not clear and it might be better to include an evaluation of where an institution considers it has areas that are ‘world class’ in the self-evaluation document;
- this would impact on the composition of review teams, which would need to be able to evaluate this area effectively;
- the review teams would need a clear understanding of the expectations regarding what the comment should cover;
- institutions’ approaches to outward mobility should be considered, including how outward student mobility programmes were promoted and how students from widening access backgrounds were being encouraged to engage;
- reviewers might not have sufficient involvement in these issues but would value the QAA sharing best practice identified by the QAA internationally;
- the review team should reflect on the impact of internationalisation rather than the activity;
- comment on internationalisation should be done within the context of an institution “demonstrating how its learning and teaching is contributing to its institutional mission, vision and strategic direction;
- ‘not applicable’ should be an option.

Q 9 – Are there any unintended consequences of including an international reviewer on the review team?

Responses noted that:

- international reviewers were being used in England as observers in 2014 before assessing how they could be incorporated into review teams from 2015 onwards;
- it was not clear what the benefits of including an international reviewer were, and that it would be better to wait for further evidence to emerge from Scotland and England before revisiting the idea;
- only institutions with substantial overseas portfolios might benefit from this;
- there were concerns that reviewers would not be familiar with the sector and the quality code and this could introduce an arbitrary element to the outcomes and judgments of the review;
- many institutional international partnerships and students were outside of the European Higher Education Area, and international reviewers should reflect this;
- there were potential cost implications of including an international reviewer that could divert money away from other areas of the review and if it was introduced in Wales before England additional costs would be incurred;
- an enhancement-led approach should focus on learning from activity external to Wales with the aim of enhancing practice in Wales.

Q 10 – Should the international reviewer be an additional reviewer or replace one of the current team members?

Additional reviewer: 9

Replacing another reviewer: 3

Did not want a reviewer replaced: 1

Responses noted that:

- it was important that given the size of the team no representatives were replaced as this would impact on the balance of the team;
- the reviewer could be an observer;
- the additional costs to the QAA and the institutions meant that it would be preferable that they replaced a reviewer.

Q 11 – Are there any unintended consequences of moving to a four year cycle?

Responses noted that:

- that there were strong disagreements to the move to a four year cycle with nine responses noting an opposition to the move and four noting support of the move;
- a lighter touch mid-cycle review would be more agreeable and would still allow for more students to interact with the review process;
- there was no logic or evidence to support the proposal;
- Welsh institutions were more likely to be benchmarked against institutions in England and Northern Ireland, and a four year review would create the impression that Welsh institutions were of a similar risk to new English and institutions in Northern Ireland, and those which had poor track records;
- this would be an added resource burden to the institutions;
- there was no evidence that there would be reputational damage;
- it would engage with students more, that it could be a less burdensome process as the increased frequency would mean the removal of the mid-cycle and there was more likely to be a corporate memory of the process.

Q 12 – Should the self-evaluation document take on any aspects of the reflective analysis? If so, which ones?

In favour / did not object: 7

Not in favour: 5

Not sure: 1

Responses noted that:

- reflective analysis should be part of a self-evaluation document and this process was already being adopted by their institutions in their own self-evaluation document;
- the inclusion of case studies around enhancement would be useful for an institution to identify what it hoped to achieve from the review but would need to be managed to avoid the review team being led to judgments;
- this should include elements based on key performance indicators, its strategic plan and learning and teaching strategies and should be through evidence-led case studies or enhancement interventions;

- some targets lent themselves to reflective analysis more than others;
- that the current document was fit for purpose as it already included a reflective element and there was no clear benefit or rationale to change this;
- anecdotal evidence suggested, whilst Scotland was cited as an example for the proposal, there was little support for it in Scotland.

Q 13 – Should an institution-specific theme(s) be part of the review process?

In favour / did not object: 5

Not in favour / raised concerns: 9

Responses noted that:

- institutional themes should be considered in the self-evaluation document;
- comparable themes ensured that a consistent review process was being applied and comparisons could be made across the sector and allow for institutions to learn from each other;
- if the theme was not subject to judgement its value would diminish;
- it was not clear who would choose the theme and some institutions could be disadvantaged by particular themes being viewed more favourably or suiting the strengths of certain institutions more than others;
- it could move Wales beyond the expectations of the quality code potentially making it difficult to judge and measure Wales;
- the institution-specific themes in the ELIR were areas for inquiry only;
- this could create additional workload and detract from the sector-wide Future Direction themes;
- if the proposal was adopted then the ELIR method would be more appropriate than the Higher Education Review proposals;
- it could allow institutions to respond to emerging concerns, for the diversity in the Welsh HE sector to be championed and for institutions to work to their strengths and needs;
- institutions should be given an opportunity to highlight new provision and structural changes which had improved quality enhancement;
- there could be scope for students and institutions to identify and review different quality enhancement themes;
- any additional tasks which went beyond the core aspects of the review might impact on the time and resources needed to complete the review.

Q 14 – Should there be an increased focus on partnership in the review process?

In favour / no objections: 12

Not in favour: 3

Responses noted that:

- whilst there was no objection in principle to an increased focus on partnership there needed to be more information about how this would work in practice;
- the work with Wise Wales and the Future Directions' student as partners quality enhancement theme should be progressed in partnerships developed through the IRW;

- the Student Engagement chapter of the Quality Code meant that partnership would already be appropriately addressed in the review;
- other proposals within the consultation would make a separate section on partnership superfluous;
- the appropriate balance between standards/quality and student satisfaction needed to be maintained;
- the review team should not be prescriptive on fostering partnership and review teams could adopt the role of a critical friend to increase the focus on partnership;
- there needed to be definition of partnership and clarity regarding the types of partnerships which would be considered;
- there should be caution about making the IRW uniquely Welsh as consistency was needed across the UK;
- it depended on the institution's portfolio;
- it would need to be clear to the review team what the expectations were as additional tasks might impact on the core requirements of the review.

Q 15 – Are there any unintended consequences of the QAA's annual visit to institutions including greater student engagement?

Responses noted that:

- this should be done through the SU;
- the diverse student body needed to be represented and there were concerns that only a few students could be contactable by the review team if the visit took place during university holidays or exams;
- it should be linked to the Student Annual Statement;
- consideration needed to be given to who the QAA meets and ensuring they understood the QAA and the IRW;
- a proper meeting structure, as noted in paragraph 50 of the consultation, was required;
- expectations around the visit would need to be understood by all concerned.

Q 16 – How could outcomes of reviews best be fed into the Future Directions biennial conference, and ongoing Future Directions work?

Responses noted that:

- the reports could be provided to the HEA to allow them to identify enhancement opportunities in liaison with the QAA and institutions;
- case studies could be developed and disseminated at the Future Directions conference on those Future Directions theme areas where institutions had received commendations in the IRW;
- it would be better to identify best practices and detail these in a document, as has been done with the QAA Institutional Audit Outcomes series;
- neither a single review nor a small number of reviews should inform Future Direction themes;
- it was important to not lose the distinction between the sector-owned quality enhancement activities of Future Directions and the quality assurance work of the QAA;

- QAA's involvement on the Future Directions Steering Group would ensure that review outcomes fed into the Future Directions work;
- identification of common themes which would allow for a consistent approach;
- events which engaged with issues arising from reviews would be best method;
- the 2016 conference would be an opportunity to address review outcomes rather than the 2014 conference which would be addressing the current and forthcoming themes.

Q 17 – Are there any unintended consequences of requiring a comment on the institution's engagement with the UKPSF?

Responses noted that:

- it was important for any targets to be set in consultation with the sector;
- a qualitative style statement where the institution described their engagement with UKPSF in the context of their own institution might be appropriate;
- institutions placed different emphasis on how they aligned with the UKPSF;
- any comment on the engagement with the UKPSF should not be based on a simple equation between the percentage of those with UKPSF qualifications and academic standards;
- due to the time constraints to complete a review any additional tasks might impact on the review team's ability to make judgements on academic standards and quality;
- there was no consideration of teaching improvements which were not explicitly stated in the UKPSF and a more general statement concerning the strength of training could address this.

Q 18 – 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?

In favour: 14

Responses noted that:

- it was paramount to be comparable with England and this proposal would allow for that;
- this would allow the review team to highlight areas of concern which did not merit a judgement of 'does not meet'.

Q 19 – 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?

Not in favour: 9

In favour: 4

Responses noted that:

- this had not been introduced in England and Northern Ireland;
- it would have been of benefit had it been introduced in England to ensure that the HE sector was comparable;

- it would prevent an overall judgement being affected by issues with collaborative partners.

Question 20 – 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?

In favour: 12

Not in favour: 1

Responses noted that:

- the process had changed in England;
- this could be extended to other reviews, eg the foundation degree review;
- some consideration was needed to ensure that students of all institutions involved in collaborative provision were enabled to be represented through a single review;
- the awarding institution's SUs should be enabled by their institution to engage with and include the partner SU in the development of the student written submission as some SUs did not have the resources to do this;
- there should be the opportunity to conduct both hybrid and separate reviews.

Q 21 – 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?

In favour: 13

Responses noted that:

- this had been adopted in England;
- it was important to ensure that the Welsh HE sector mirrored the English HE sector.

Q 22 – Should the name of the review process be changed? If so, do you have any suggestions?

In favour / offered suggestion: 12

Not in favour: 1

Responses noted that:

- 'Developmental' could be in the title to differentiate it from an 'inspection';
- it should not change name;
- it should be the same name across the UK;
- it could be called:
 - Welsh Higher Education Review;
 - 'Partnership and Enhancement-led Review Wales';
 - Higher Education Review Wales;
 - Higher Education Enhancement Review Wales.

Q 23 – Are there any unintended consequences of requiring further education institutions with directly funded higher education provision to subscribe to the QAA?

Responses noted that:

- this would be in place in England from 1 August 2013;
- there would be cost implications on an FEI.

Appendix A. Respondents

Aberystwyth University

Bangor University

Bangor University Students' Union

Cardiff Metropolitan University

Cardiff University

Glyndŵr University

Grŵp Llandrillo Menai

Higher Education Academy (HEA)

Higher Education Wales (HEW)

National Union of Students (NUS) Wales

Quality Assurance Agency (QAA)

Swansea University

Swansea University Students' Union

University of South Wales

University of Wales, Trinity St David