Future approaches to quality assessment in England, Wales, and Northern Ireland

Analysis of responses to consultation

November 2015

HEFCE 2015/30

Quality Assessment Review

Contents

Future approaches to quality assessment in England, Wales and Northern Ireland: Analysis of responses to consultation

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	Chairs of governing bodies of higher education institutions in England, Wales and Northern Ireland
	Heads of other higher education providers
	Students' representatives
	Professional, statutory and regulatory bodies
	Key stakeholders with an interest or involvement in the regulation of higher education
	Individuals and organisations with an interest in quality assessment in higher education
Of interest to those responsible for	Quality assessment and quality assurance; Academic governance; Planning and management; Student experience and engagement; Learning and teaching.
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Enquiries to	Sally Brown, tel 0117 931 7033, email qualityassessmentreview@hefce.ac.uk.
	Institutions and organisations in Wales are welcome to discuss the report with HEFCW. Please email Cliona.ONeill@hefcw.ac.uk.
	Institutions and organisations in Northern Ireland are welcome to discuss the report with DELNI. Please email Claire.Thompson@delni.gov.uk.

Introduction

1.	This document presents the results of the analysis of responses to 'Future approaches to quality assessment in England, Wales and Northern Ireland: Consultation' (HEFCE 2015/11), held earlier this year. The consultation represented the second phase of the Quality Assessment Review initiated by the three higher education funding bodies in England, Wales and Northern Ireland as part of each funding body's statutory duty for quality assessment in higher education.

2.	This report provides the results of an analysis of the written responses to the consultation proposals. An overarching summary is provided in Part A; a full question-by-question analysis is provided in Part B. The report does not attempt to set out the policy implications of the pattern of responses, nor the decisions and next steps for the

individual funding bodies in response to the analysis of results. These will follow at a later date.

Where to find out more

3. Full information about the Quality Assessment Review is available on the HEFCE website at www.hefce.ac.uk/reg/review/.

4. More information about the review as it is being taken forward in Wales is available at

www.hefcw.ac.uk/policy_areas/learning_and_teaching/teaching_quality_assurance.aspx.

5. More information about the review in Northern Ireland is available at https://www.delni.gov.uk/articles/higher-education-quality-assurance.

Action required

6. This publication is for information.

7. Institutions and organisations in England are welcome to discuss the report with HEFCE. Publicly funded HE providers in England should contact their HEFCE regional consultant in the first instance (a list of contacts is available at www.hefce.ac.uk/contact/search/). Other stakeholders should contact the Quality Assessment Review team using the contact details at the beginning of this document.

8. Institutions and organisations in Wales are welcome to discuss the report with HEFCW. Please email Cliona.ONeill@hefcw.ac.uk.

9. Institutions and organisations in Northern Ireland are welcome to discuss the report with DELNI. Please email Claire.Thompson@delni.gov.uk.

Part A

Results of the analysis of the consultation responses

10.   The consultation proposed a common framework for future approaches to quality assessment across England, Wales and Northern Ireland. The differing national contexts provided different flavours to the proposed implementation of future approaches in each country. The consultation set out proposals, and asked for views, in five areas:

- principles for a quality assessment system

- gateways into the higher education system for new providers

- student academic experience for established providers

- academic output standards for established providers

- 'when things go wrong' in established providers.

11.   A quantitative analysis of those who agreed or disagreed with each question reveals broad agreement with the proposals. Figure 1 gives an aggregated view of the answers from all respondents to all questions, with four respondents agreeing for every one who disagreed.

Figure 1: All responses to questions by all respondents
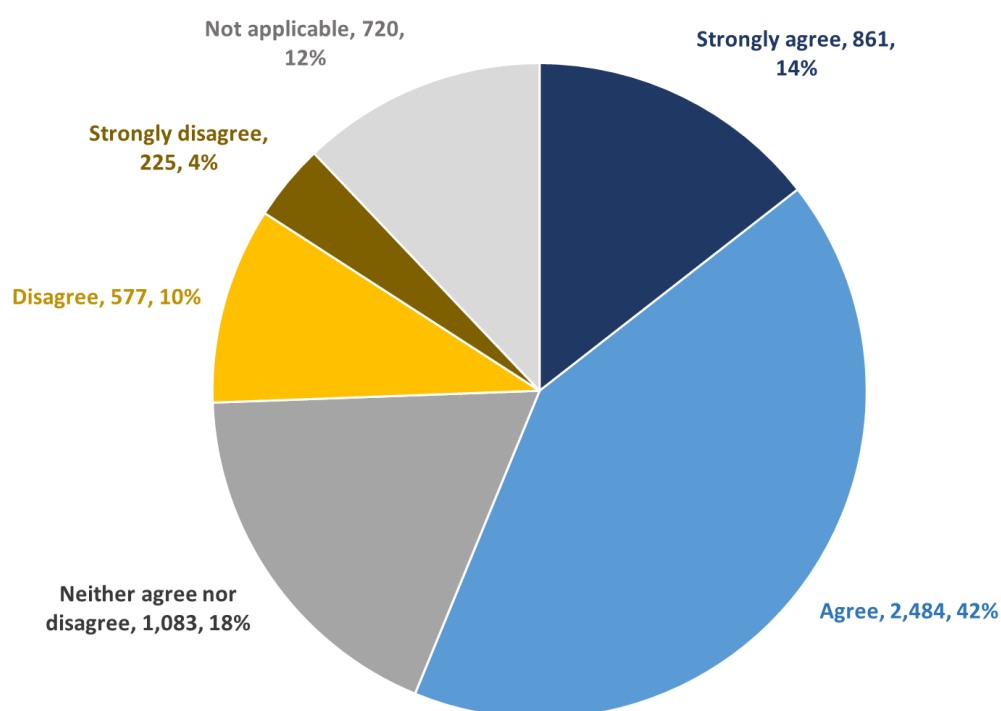
12.   A full list of the consultation questions, a breakdown of levels of agreement for each, and an analysis of related comments is provided in Part B.

13.   For every individual question there were more respondents who agreed (ticking either 'strongly agree' or 'agree') than who disagreed (with either 'strongly disagree' or 'disagree'). For most questions the difference between numbers of 'agree' and 'disagree' responses was large, revealing a strong positive endorsement on those questions.

14. Although all questions received more 'agree' than 'disagree' responses, in a small number of questions the two views were more balanced. In particular we identified two areas – proposals to strengthen the external examining system and to place more emphasis on the role of a provider's governing body – where the difference between those in agreement and those in disagreement was much narrower, which suggests greater polarisation of views and indicates that further careful reflection and adjustment will be necessary.

15. The overall patterns of responses for England, Wales, and Northern Ireland were similar. Respondents in Wales and Northern Ireland raised some additional issues about the rationale for change, the impact of the proposals on the brand of UK higher education, and maintaining student engagement. Further information is available in paragraphs 104 to 111.

16. The following sections provide a summary of the analysis of each area of the consultation.

Principles for a quality assessment system

17. There was strong endorsement of the proposed principles for future approaches to quality assessment with 79 per cent of respondents agreeing or strongly agreeing with the question.

Figure 2: Responses to Question 1[1]
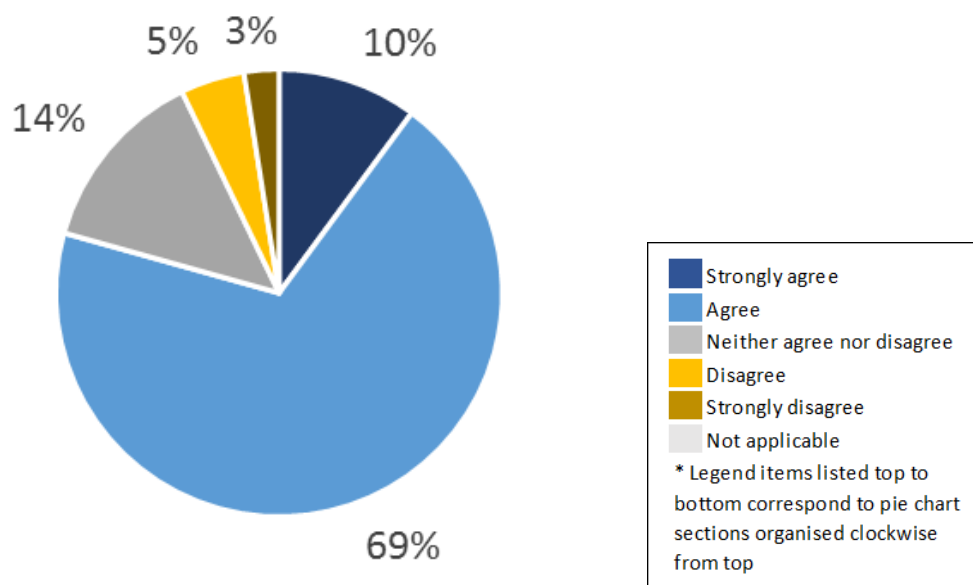
Note: Question 1 – Do you agree with our proposed principles to underpin the future approach to quality assessment in established providers?

> 'In broad terms, these principles appear to provide an appropriate underpinning for the future approach to quality assessment.' (Publicly funded higher education institution (HEI))

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[1] 238 respondents answered the Likert-scale component of this question.

18.   Where comments were made these tended to be observations about a particular principle, or about how a principle might be implemented, or the relative importance of individual principles. Respondents agreeing with the proposals made comments supporting various principles including the importance of institutional autonomy and diversity, the need to maintain elements of peer review, and student partnership. Respondents accepted that changes were needed to the current system and recognised the benefits of the proposals, including with regard to the reduction in the perceived 'burden' of current arrangements. There were strong calls for the focus on student engagement set out in the 'principles' to be fully translated into future quality assessment arrangements. Some respondents expressed reservations relating to the implementation of other proposals in the consultation and their effect on these principles, for example an increased use of metrics.

19.   Just 17 respondents disagreed with the proposed principles. Disagreement appeared to relate to a specific principle or principles, rather than to all of the principles or broad direction of travel.

> 'No. While [name redacted] can welcome a number of the proposed principles, we specifically do not agree with principles C and H' (Sector representative body)

> 'Our core issue stems from University's governing bodies having oversight of academic standards as many governing bodies are far removed from actual teaching and do not have the knowledge to carry out a thorough review.' (Student organisation)

One size does not fit all

20.   One of the strongest and most consistent messages – with similar comments made in response to a number of questions – was that the diversity of providers, provision and students across the sector means that 'one size' of quality assessment is no longer appropriate.

Figure 3: Responses to Question 3[2]
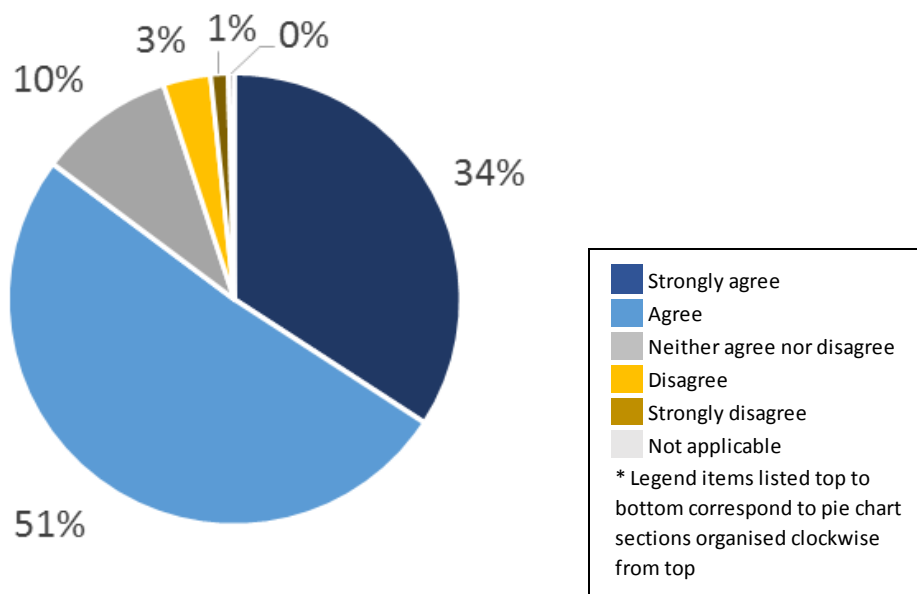
Note: Question 3 – Do you agree that future approaches to quality assessment should be based on an assumption that 'one size' can no longer sensibly fit all?

21.   A very significant majority of respondents either agreed or strongly agreed with the proposal. Of the respondents in agreement with this proposal, 51 commented on the diverse nature of UK higher education (HE), which they viewed as a strength to be encouraged and protected. The importance of an individual provider's particular context, and the need to ensure that approaches to quality assessment properly reflected this, were stressed by many respondents.

> 'We agree that assessment must not lead to uniformity: there must be sufficient flexibility in the evidence base institutions must produce to demonstrate quality.' (Sector representative body)

> 'There are wide ranging variations in the types/size/focus of institutions delivering HE therefore there is a need to have flexibility whilst still ensuring agreed standards are being met.' (Publicly funded further education college (FEC))

22.   Respondents in agreement with the proposal also commented repeatedly (17 times) on the implications of the increasing diversity of the student population.

> 'Students now come from more diverse backgrounds and non-uniform experiences, and with differing aims. If institutions are to meet their expectations and the needs of their future employers, they cannot be constrained by needing to meet an inflexible set of criteria. What may be "quality" in one circumstance may be inappropriate in another.' (Sector representative body)

[2] 238 respondents answered the Likert-scale component of this question.

23.   A small number of respondents (seven) in support of this proposal also commented on the importance of appreciating the potentially disproportionate burden of regulation on smaller, newer and private institutions. In similar territory, five respondents challenged the assumptions they believed governed judgements about where 'risk' might be found in a diverse sector.

> '…there is a concern that such statements are usually taken to mean that systems should be more burdensome/frequent for alterative/new providers than for established ones, with an automatic assumption that existing providers are not "risky" unless something clearly goes wrong, whereas for alterative or new providers the opposite is the case. We would wish to challenge this assumption.' (Sector representative body)

24.   Respondents also welcomed the proposed streamlining of quality assessment arrangements and the proposal to make greater use of student outcomes data both internally and by the regulator or funding body. In this context, the theme of 'one size' no longer 'fitting all' meant ensuring that such data, whether used by a provider to drive continuous improvement activities or by the funding bodies, was appropriately benchmarked so that the context for a provider and its students was properly reflected.

25.   A number of those responding positively to the proposals to ensure reasonable comparability of degree standards also noted that the pursuit of such reasonable comparability was essential in an increasingly diverse system. The very strong support for Question 16 confirms the importance of this issue. Others noted the challenges in achieving this in circumstances where courses, even in the same subject area, could be very different.

Figure 4: Responses to Question 16[3]
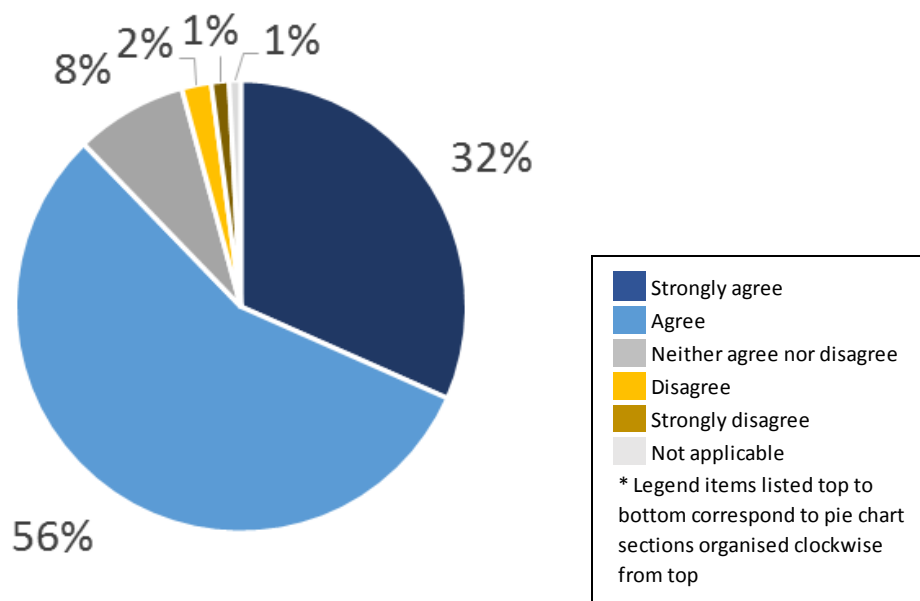
Note: Question 16 – Do you agree that a future quality assessment system must provide reliable assurances to students and other stakeholders about the maintenance of academic output standards and their reasonable comparability across the UK higher education system?

26.   A small number of respondents were concerned that a system capable of accommodating diversity might produce and endorse too much variation in 'quality' across the sector.

Embedding external scrutiny

27.   There was agreement with the proposed pattern for external scrutiny, although agreement was often qualified, either with specific concerns, or with questions about how individual elements would work in practice. Those agreeing with the proposals endorsed, in particular, the aim to reduce bureaucracy and regulatory cost; the shift away from a focus on institutional processes; the proposals for peer review of providers seeking to enter the HE system; and the proposals for intervention where there was material evidence of a problem within an individual provider.

28.   A relatively large number of respondents to this question indicated that they neither agreed nor disagreed with the proposals. These responses tended to express general support for the proposed direction of travel but also registered concerns or asked for further information. They also tended to reintroduce arguments made in response to other areas of the proposals, for example, in respect of the role of governing bodies, strengthening external examining and the involvement of professional, statutory or regulatory bodies (PSRBs). In particular, comments were made about a perceived increase in cost and burden to the sector stemming from the proposals to strengthen the external examining system.

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[3] 238 respondents answered the Likert-scale component of this question.

Figure 5: Responses to Question 20[4]
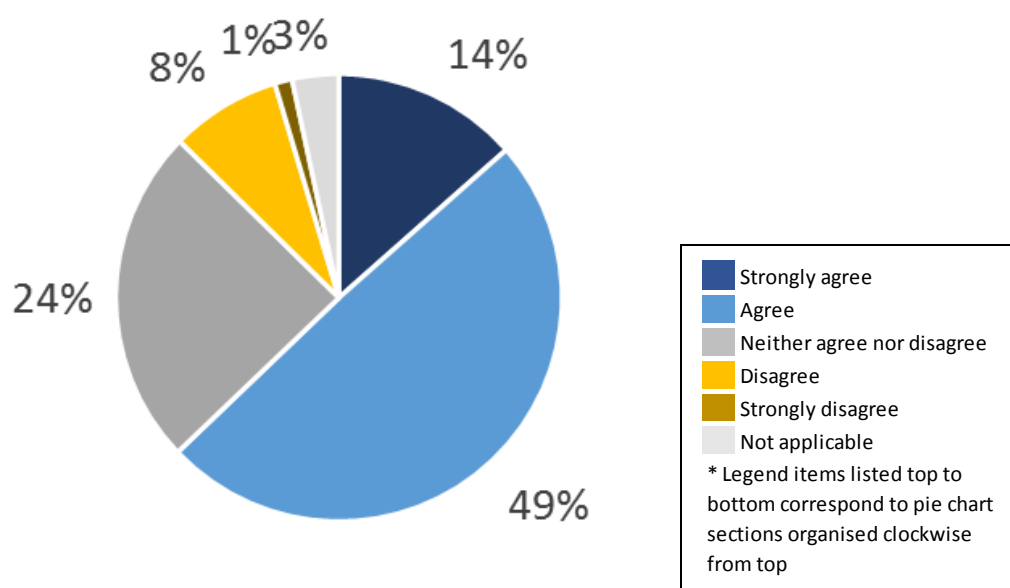
Note: Question 20 – Do you agree that providers should use the accreditation activities of at least some PSRBs more centrally in future approaches to quality assessment?

29.   Respondents to Question 20 often argued that PSRBs should be one element of the future approaches to quality assessment (QA), rather than the sole means by which a subject or discipline was assessed for quality (43 comments). Respondents were equally likely to raise this point whether they agreed or disagreed with the proposal. Respondents who agreed and those who were neutral to the proposals were equally concerned that the work of a particular PSRB should be used only where it was appropriate and relevant (41 comments). Respondents commented 28 times that many providers already used the work of PSRBs in their internal quality processes, and that it would be a positive development if more central use reduced duplication and burden.

30.   A small number of respondents identified aspects of the current quality assessment arrangements that they did not want to lose, for example, shared sector ownership of academic standards, peer review and current models of co-regulation and co-ownership. These views tended to come from those who had argued in response to other questions for the retention of repeated cyclical peer review carried out by an 'independent' agency or, to a lesser extent, for the retention of the Quality Code in its current form.

Baseline requirement for the quality of the student academic experience

31.   There was very strong agreement with the proposal to develop and publish a 'baseline requirement' for the quality of the student academic experience against which providers seeking to enter the HE sector could be tested. Such a baseline requirement should build on the most helpful current reference points, but avoid the perceived burden and 'tick-box' operation of some aspects of the current UK Quality Code.

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[4] 238 respondents answered the Likert-scale component of this question.

Figure 6: Responses to Question 4[5]

Legend:
- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not applicable

* Legend items listed top to bottom correspond to pie chart sections organised clockwise from top

Pie chart values: 35%, 52%, 10%, 2%, 0%, 1%
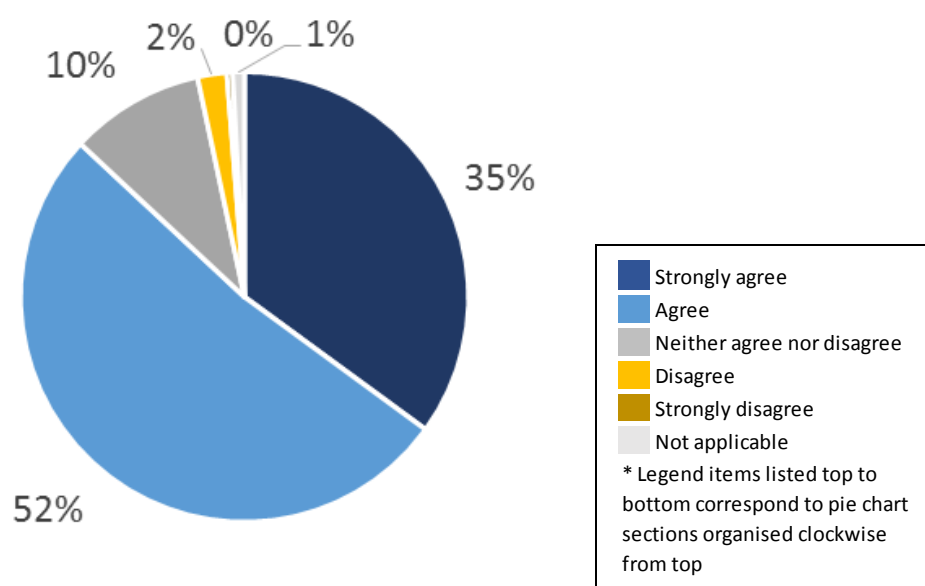
Note: Question 4 – Do you agree that there should be a baseline requirement for the quality of the academic experience for students, and that this should be published and maintained?

> 'This would demonstrate a strong commitment to consistency in academic practice, and would allow new entrants to the sector a transparent benchmark. It may also aid public confidence in higher education quality.' (Student organisation)

32.   Respondents often commented on the detailed arrangements for developing and implementing such a baseline requirement which should:

- be developed in close consultation with the sector and with students

- recognise that students would have an important contribution to make to the development of a baseline requirement and that the baseline would need to be accessible and clear to students and non-specialists

- reflect the diversity of the student academic experience in a diverse system

- reflect the strong position of the UK sector in the global market, (several respondents argued that any baseline must therefore not be set too low)

- recognise the existence of other requirements (for example the Competition and Markets Authority guidance)

- ensure sufficient testing or scrutiny of new entrants to the market

- be reviewed regularly to ensure its continuing relevance.

33.   The UK Quality Code for HE was mentioned by around a fifth of respondents. Over half of these comments were positive about the Code although very few indicated that it should be retained in its current form. Approximately a third of respondents felt that the

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[5] 238 respondents answered the Likert-scale component of this question.

Code should form the basis for the proposed baseline requirement for the quality of the student academic experience.

Gateways into the publicly funded sector

34. There was very strong support for external peer review against the baseline requirement for quality, for those providers seeking entry to the publicly funded system.

Figure 7: Responses to Question 25[6]

Legend:
- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not applicable

* Legend items listed top to bottom correspond to pie chart sections organised clockwise from top

Pie chart values: 38%, 51%, 5%, 0%, 0%, 5%
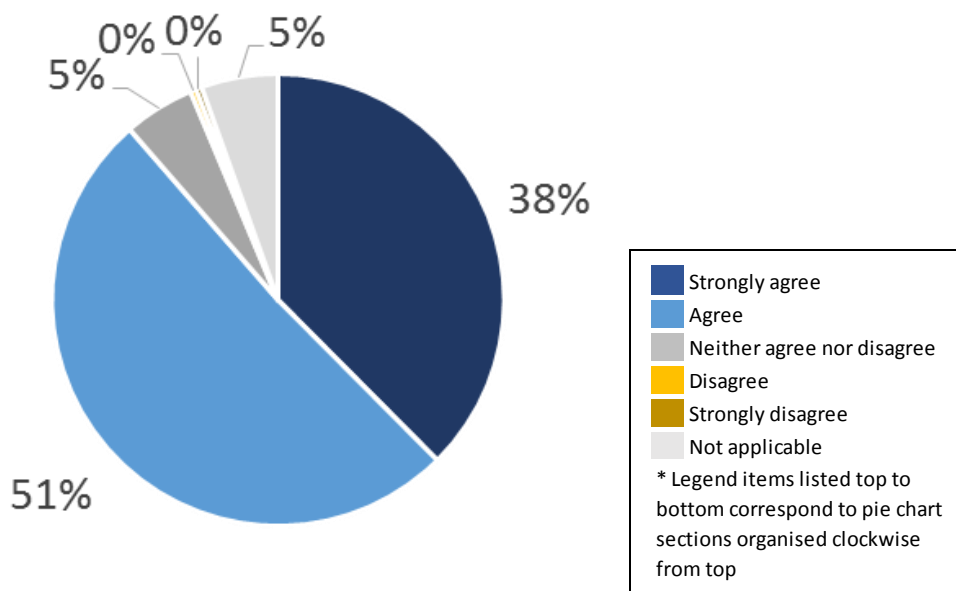
Note: Question 25 – Do you agree with the proposal that providers seeking entry to the publicly funded sector in England and Northern Ireland should be tested, through an external peer review scrutiny process, against a set of baseline requirements for quality?

35. There was also support for a probationary period for those providers recently through the entry gateway, although many respondents had additional comments, or required further detail about the implementation of this proposal.

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[6] 238 respondents answered the Likert-scale component of this question.

Figure 8: Responses to Question 14[7]
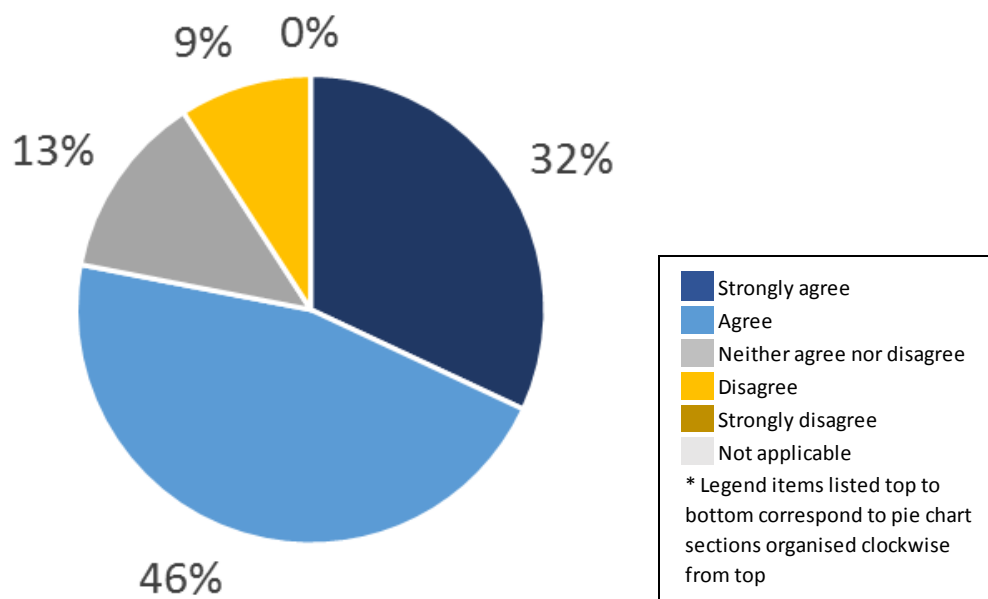
Note: Question 14 – Do you agree that there should be a 'probationary period' for new entrants to the publicly funded sector in England?

36.   There was an emphasis on protecting the collective student interest which was considered to be particularly important in circumstances where an institution did not meet probationary requirements. Respondents who agreed with the proposal recommended that the practical operation of a probation period should be flexible to accommodate different types of new entrants and the level of assurance they were able to provide.

37.   Respondents who were less supportive of a probationary period often expressed a preference for the initial entry gateway to present a relatively high bar, after which lighter-touch monitoring would be more appropriate.

Repeated external cyclical review against baseline requirements

38.   There was strong support, from all types of provider, for the proposals that, once through an entry gateway (and probation that incorporated the baseline requirement for quality), an established provider should not be repeatedly externally re-tested against that baseline requirement unless material evidence suggested that there was a problem.

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[7] 219 respondents answered the Likert-scale component of this question.

Figure 9: Responses to Question 5[8]

Legend:
- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not applicable

* Legend items listed top to bottom correspond to pie chart sections organised clockwise from top
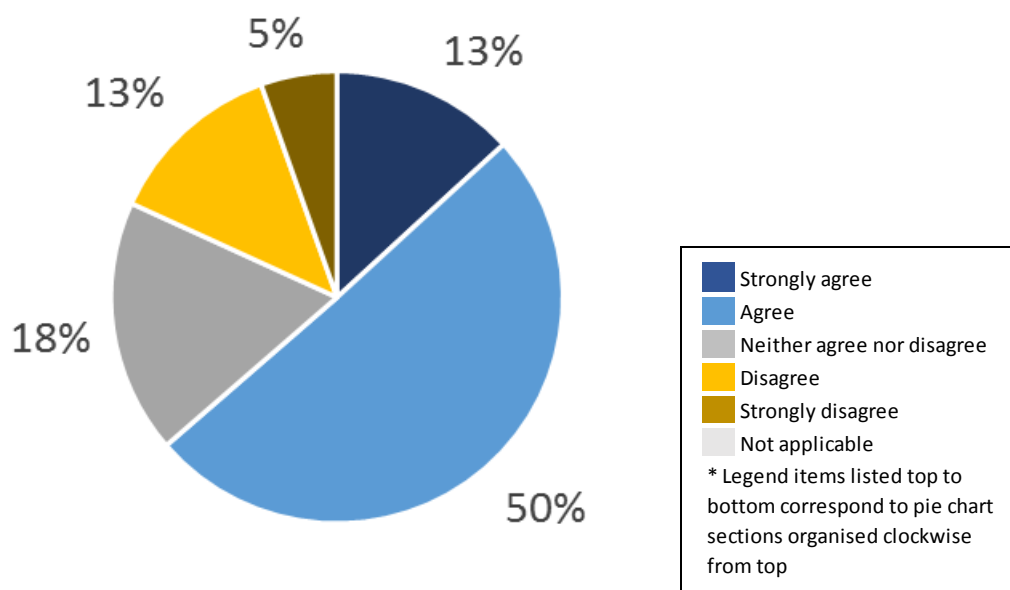
Note: Question 5 – For England, do you agree with the proposal that an individual provider, once it has passed the gateway for entry into the publicly funded system in England, should not be repeatedly externally retested against the baseline requirements for an acceptable student academic experience, unless material evidence suggests otherwise?

> 'This seems like a sensible proposal and meets the requirement for good quality assurance whilst managing the burden associated with a quality assurance process.' (Individual academic)

> 'The university is strongly supportive of the proposal to end cyclical retesting against the existing baseline requirements.' (Publicly funded HEI)

39.   Agreement with this question was much less qualified than on some of the other proposals, with 36 respondents offering no comments. Where comments were made they tended to provide suggestions on implementing the proposal, rather than about the proposal itself. Many of the additional comments made by those agreeing with the question were also made by the 39 respondents who disagreed.

40.   There was broad agreement from across the spectrum of respondent types, including 78 higher education institutions, 16 further education colleges, 10 sector representative bodies and nine student organisations.

41.   The most common response to this question from all respondents (32 comments in total) related to what would constitute 'material evidence' that institutions no longer met the baseline requirements for an acceptable student academic experience. A further 23 comments related to how material evidence would be flagged, while the time frame between issues arising and investigation was cited as an issue by five respondents.

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[8] 220 respondents answered the Likert-scale component of this question.

'…any form of system that involves triggered reviews must have rigorous processes in place to ensure that interventions are measured, appropriate and swift when things do go wrong.' (Student organisation).

42.   A large number of respondents (29) suggested that closer monitoring, or scrutiny, would be appropriate under some circumstances, for example during a probationary period for new entrants.

'The baseline standard should not represent a prohibitive barrier and a sliding scale of external oversight should be used to support providers to develop appropriate academic governance and internal review standards.' (Sector representative body)

43.   The role of students in the quality assessment process (especially in flagging 'material issues' to the funding body) was raised by several student representative groups, as well as by some HEIs and FECs (nine responses in total).

'Any such system must have plain and clear guidance for how students and students' unions highlight issues within their education, and a process by which students and students' unions have the power to trigger a review.' (Student organisation)

44.   Among respondents who disagreed with this proposal, 19 respondents believed that repeated cyclical review should be retained.

'External review provides a measure of trust in the higher education sector, and enables students to fundamentally influence quality enhancement policy and practice.' (Student organisation)

45.   However, 10 of these respondents also recommend that the current arrangements for repeated cyclical review should be reviewed and streamlined to address concerns about the perceived burden on providers and, in particular, a sense that there was a diminishing return for long-established providers.

'The current Higher Education Review methodology unhelpfully focuses on QA processes rather than their effectiveness, is overly bureaucratic and burdensome and is of limited use to institutions in terms of outcomes.' (Publicly funded HEI)

Student outcomes rather than a provider's processes

46.   There was strong support for the proposals to shift the focus of quality assessment away from institutional processes onto student outcomes.

Figure 10: Responses to Question 8[9]

Legend:
- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not applicable

* Legend items listed top to bottom correspond to pie chart sections organised clockwise from top
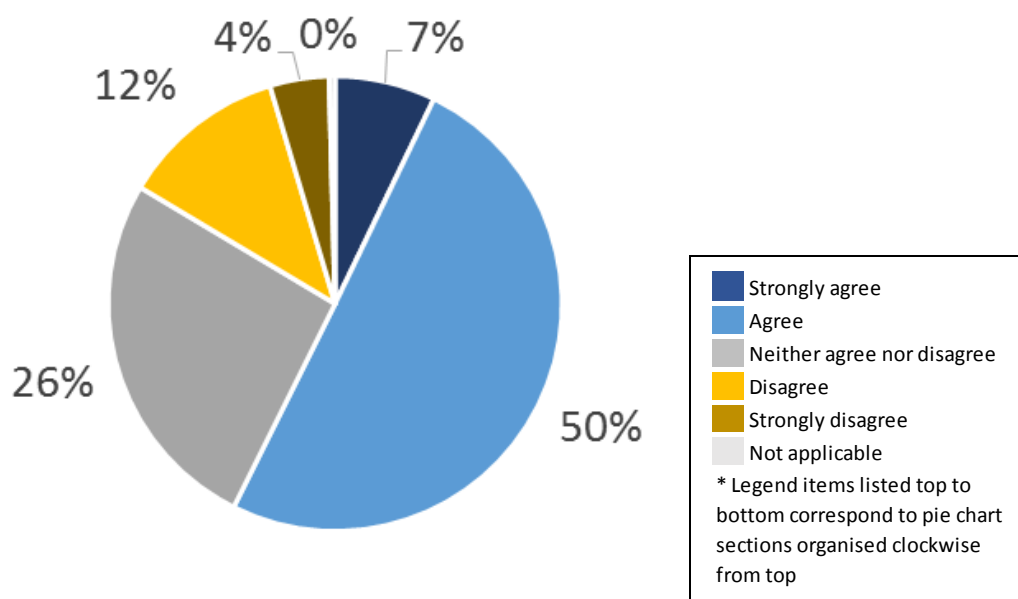
Note: Question 8 – Do you agree that student outcomes data should provide the basis for continuous improvement activities within an individual provider?

47.   Most respondents agreed that student outcomes data was an important element of a provider's improvement activities. There was relatively little active disagreement: indeed it seems that the question was treated as an axiomatic statement to which caveats might be added, rather than as an area for exploration. There was very little difference between the focus of the comments attached to differing levels of agreement. Of the 35 respondents who did not add comments, 23 agreed with the proposal.

48.   The most frequent comment, made 81 times, was that student outcomes data should be 'a basis', rather than 'the basis' for continuous improvement activities. However, concerns were also expressed (70 comments) about the robustness and limitations of current student outcomes data, including the National Student Survey and Destinations of Leavers from Higher Education survey (DLHE).

> 'It is critical that the relationship between student outcomes, institutional process and institutional context is understood (within and outside an institution). We would be concerned if the work to be taken forward looks to manipulate existing student outcomes data (e.g. degree outcomes or DLHE).' (Publicly funded HEI)

49.   There were also calls in 46 comments for further exploration of the need to produce a more robust set of student outcome metrics.

> 'Before any decision is made on the role that student outcomes data plays in providing the basis for continuous improvement activities, specifically what is meant by student outcomes data needs to be provided, and a robust justification given for the measures used.' (PSRB)

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[9] 238 respondents answered the Likert-scale component of this question.

50.   These overarching opinions were underpinned by suggestions on the additional data that could be included, with over 200 comments on individual qualitative measures and potential context considerations. Common concerns here were for institutional context to be fully recognised, including: student type and characteristics; mission; provision type and size; geographical location and reach; and subject.

51.   We have also identified support for the proposal that the funding bodies should verify that a provider's own review processes were appropriately focused on outcomes rather than processes. This was seen as part of a less burdensome, risk-based approach.

Figure 11: Responses to Question 7[10]
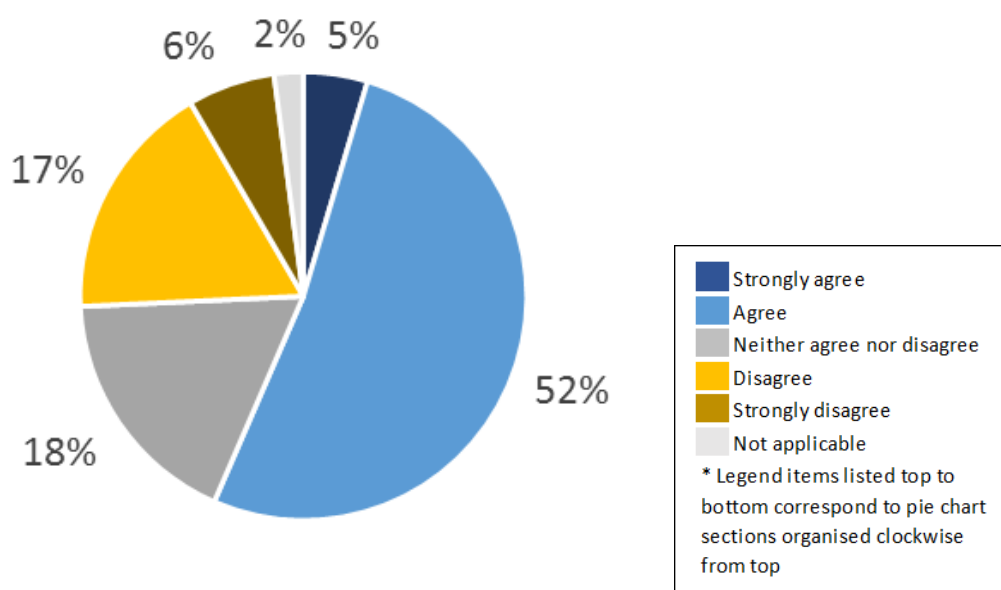
Note: Question 7 – Do you agree that the funding bodies' verification of an institution's review methodology provides a reasonable mechanism through which to operate risk-based scrutiny of a provider's arrangements to secure a good and improving student academic experience and student outcomes?

52.   Clarification was sought on the methodology, the role of the funding bodies and the expertise and capacity needed to deliver the necessary verification.

53.   A large majority of respondents agreed with the proposal that the funding bodies would scrutinise student outcomes data regularly to ensure that any signs that things were going wrong in an individual provider were quickly identified.

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[10] 238 respondents answered the Likert-scale component of this question.

Figure 12: Responses to Question 9[11]

Legend:
- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not applicable

* Legend items listed top to bottom correspond to pie chart sections organised clockwise from top

Pie chart values: 1%, 15%, 57%, 20%, 5%, 3%
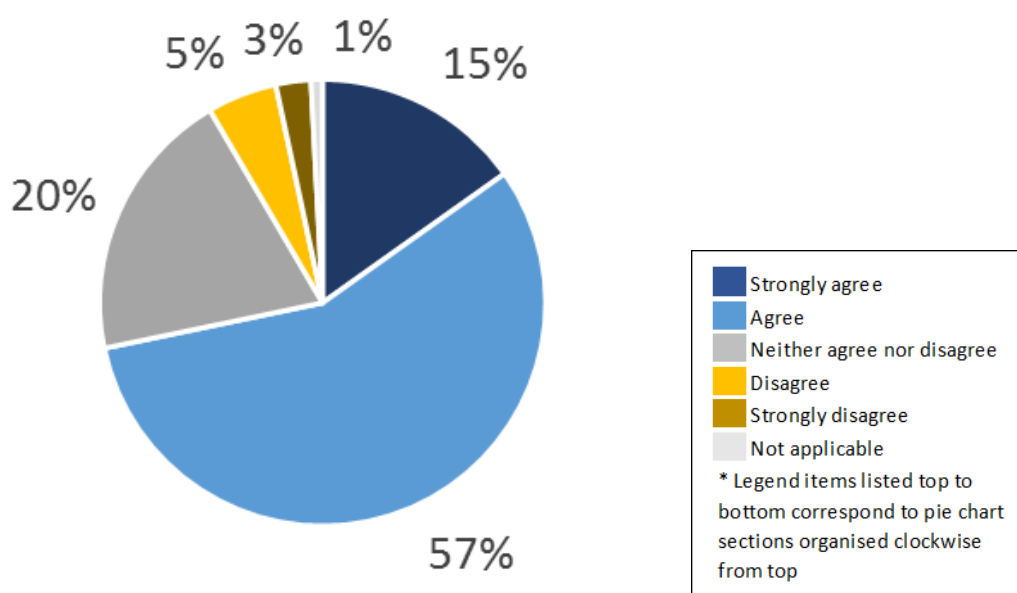
Note: Question 9 – Do you agree that we should take forward into detailed design and pilot phases further work on the use of student outcomes data to identify patterns and trends and on the development of approaches for monitoring and supporting institutions as they address areas of concern?

54.   This was seen as an appropriate mechanism to ensure that scrutiny could be applied to providers on the basis of evidence of risk. Data definitions, standards and processes must be decided in partnership with the sector to ensure the data is robust and implications are well understood. Any pilot activity should include a diverse range of providers and provision, with consideration given to collaborative and transnational education. Qualitative data collection should also be piloted to see whether meaningful trends can be discerned, and to understand how such data can support the process.

55.   When discussing the use of student outcomes data, either by a provider or by the funding body, the majority of respondents, whether agreeing or disagreeing with the proposals, raised issues about the appropriate use of such data, with multiple references to the themes identified in the Wilsdon report on 'responsible metrics'[12], and a reminder that 'one size' cannot 'fit all' in this area. Common concerns here were for institutional context to be fully recognised, including student type and characteristics; mission; provision type and size; geographical location and reach; and subject. Similarly, concerns were frequently raised about using student outcomes data for external comparison, with some highlighting the potential for misleading comparisons if the context for a provider was ignored.

56.   Taken together, the responses to the proposals for the removal of repeated cyclical external review, the strengthening of a provider's own review processes, and careful

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[11] 238 respondents answered the Likert-scale component of this question.
[12] 'The Metric Tide: Report of the independent review of the role of metrics in research assessment and management', available at www.hefce.ac.uk/pubs/rereports/Year/2015/metrictide/.

monitoring of student outcomes data by the relevant funding body, represent a positive endorsement of the core shift in quality assessment proposed in the consultation document.

Academic output standards and the external examining system

57. We received very strong endorsement of the principle that a future quality assessment system must provide reliable assurances about the maintenance of academic output standards and their reasonable comparability.

Figure 13: Responses to Question 16[13],[14]
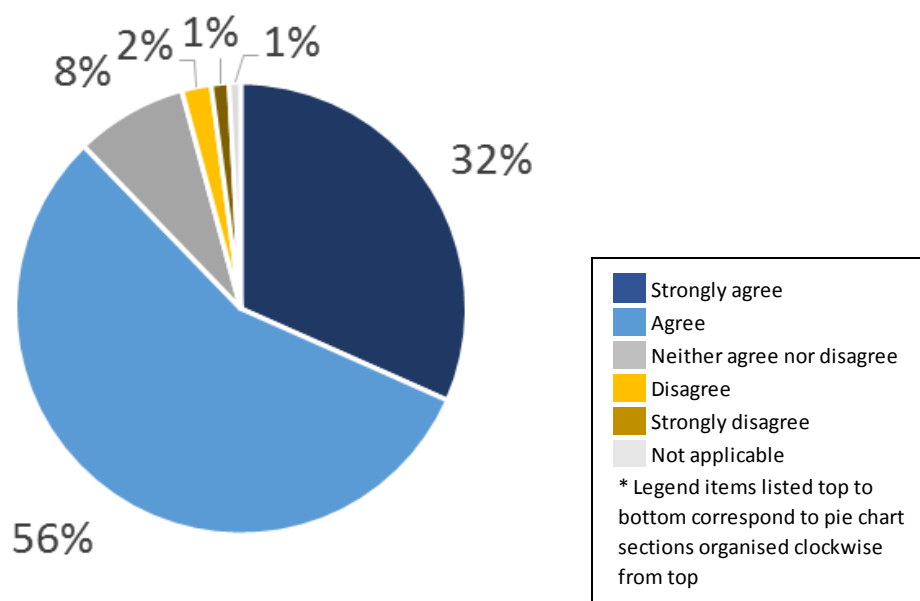
Note: Question 16 – Do you agree that a future quality assessment system must provide reliable assurances to students and other stakeholders about the maintenance of academic output standards and their reasonable comparability across the UK higher education system?

58. However, the questions about strengthening the external examining system provided a smaller difference between numbers of 'agree' and 'disagree' responses, and a relatively high number of 'neither agree nor disagree' responses.

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[13] 238 respondents answered the Likert-scale component of this question.
[14] This figure reproduces Figure 4.

Figure 14: Responses to Question 17[15]
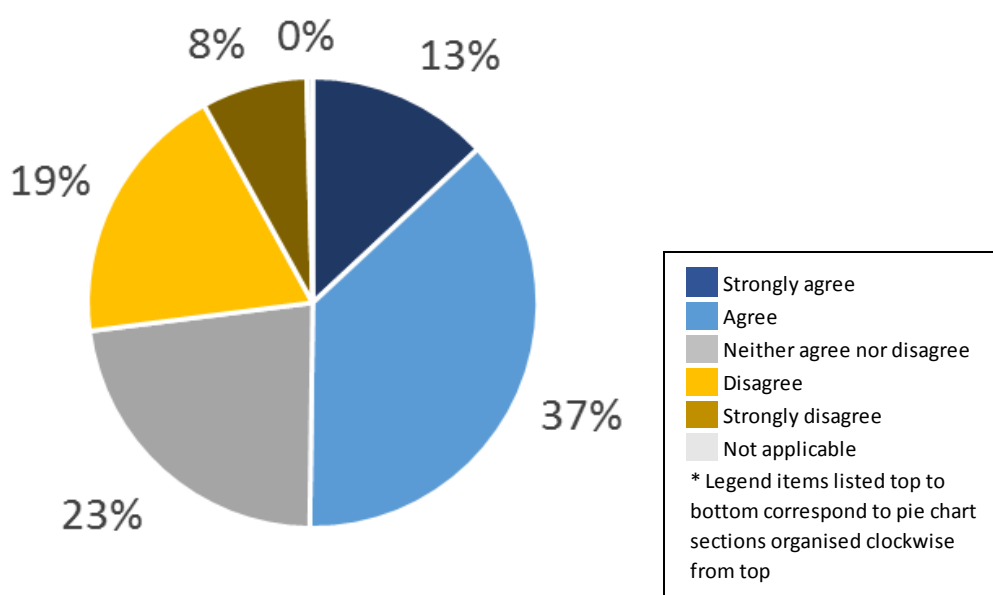
Note: Question 17 – Do you agree that the external examining system should be strengthened in the ways proposed, i.e. through additional training and the establishment of a register?

59.   Here, detailed analysis of comments reveals cautious support for the proposals, and the issues raised tend to be practical rather than on matters of principle.

> 'The establishment of a register requires further clarification in terms of what an examiner would need to do to join the register and then maintain their registration.' (Publicly funded HEI)

60.   There was widespread recognition that the external examining system was owned by the sector as a whole and a strong desire for further consultation to take place on these aspects of the proposals, led by the sector representative bodies as proposed in the consultation document. There was broad recognition that the system needs strengthening, with a more cautious response to the idea of a register than to the idea of more formal training of some kind.

61.   A clearer explanation for the value of such training was requested, together with more information about practical implementation of the proposal. It is clear that great care would need to be taken to ensure that too great a time commitment did not disincentivise the recruitment of high quality examiners.

62.   We are able to identify a significant difference in views across respondent types: HEIs (but not FECs or alternative providers) generally disagree with the proposals on external examining, but students and PSRBs show high levels of agreement and also indicated that the proposals might not go far enough in providing reliable assurances about degree standards.

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[15] 238 respondents answered the Likert-scale component of this question.

Figure 15: Breakdown of responses to Question 17[16]

Student organisations - 30
7% 3% 0%
20%
70%

HEIs - 118 respondents
8% 4%
28%
32%
27%

FECs - 23 respondents
4% 4%
0%
30%
61%

Professional bodies - 17
0% 6%
12%
24%
59%

■ Strongly agree	■ Agree	■ Neither agree nor disagree	■ Disagree	■ Strongly disagree

* Legend items listed left to right correspond to pie chart sections organised clockwise from top
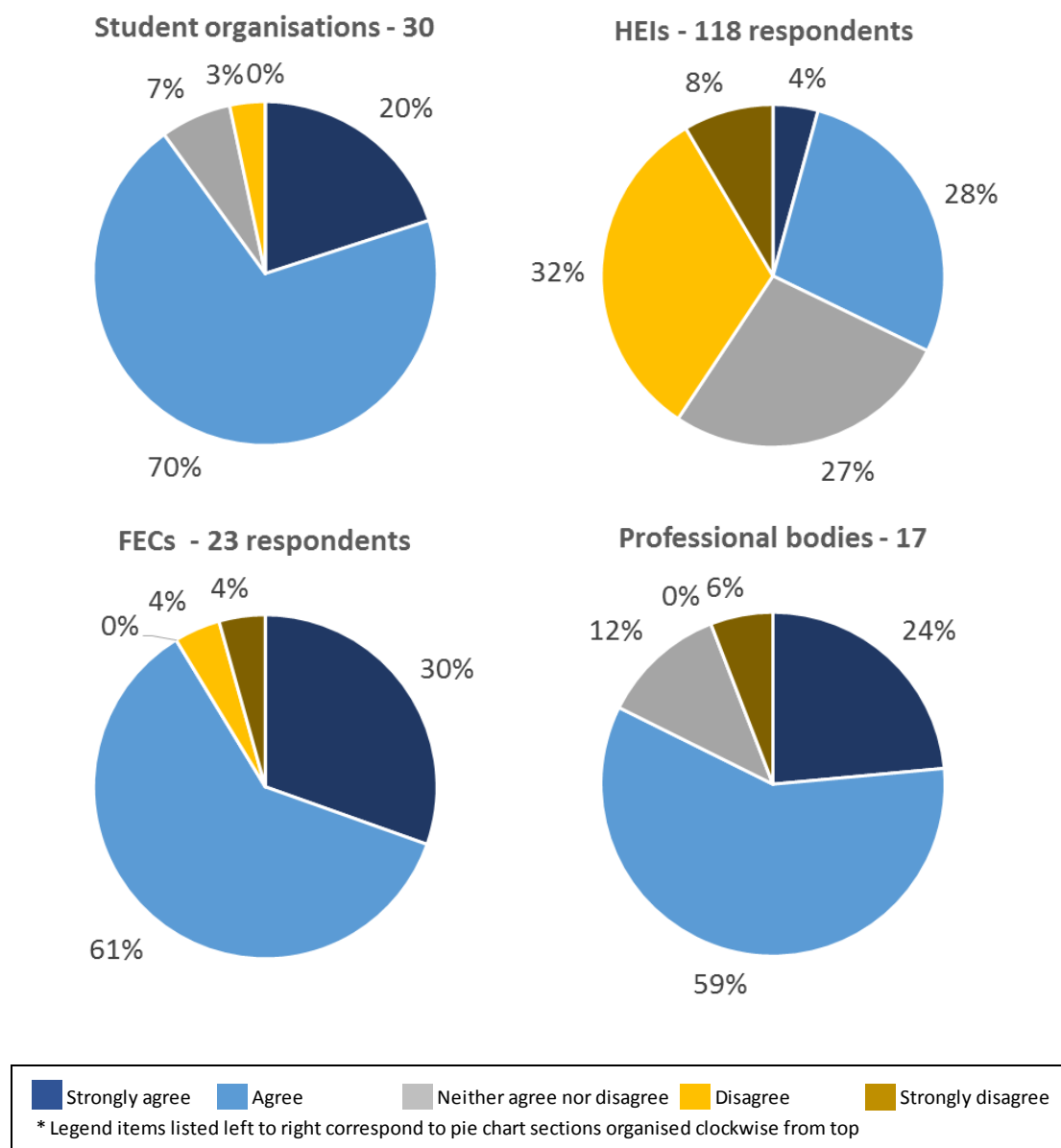
63.   Among those disagreeing with the proposals, arguments tend to centre on the need to protect institutional autonomy, and reveal a confidence in the adequacy of the current arrangements, including their less formal aspects. Concerns were also expressed that the proposals represent an additional burden for providers, and that training could not be a substitute for experience and expertise.

64.   The majority of respondents supported the proposals on the calibration of standards by different subject communities, although emphasis was often on 'exploring' potential models and approaches.

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[16] Breakdown of the 237 respondents who answered the Likert-scale component of this question, by type of organisation. Shows 188 respondents who represented the four types of organisation considered.

Figure 16: Responses to Question 19[17]
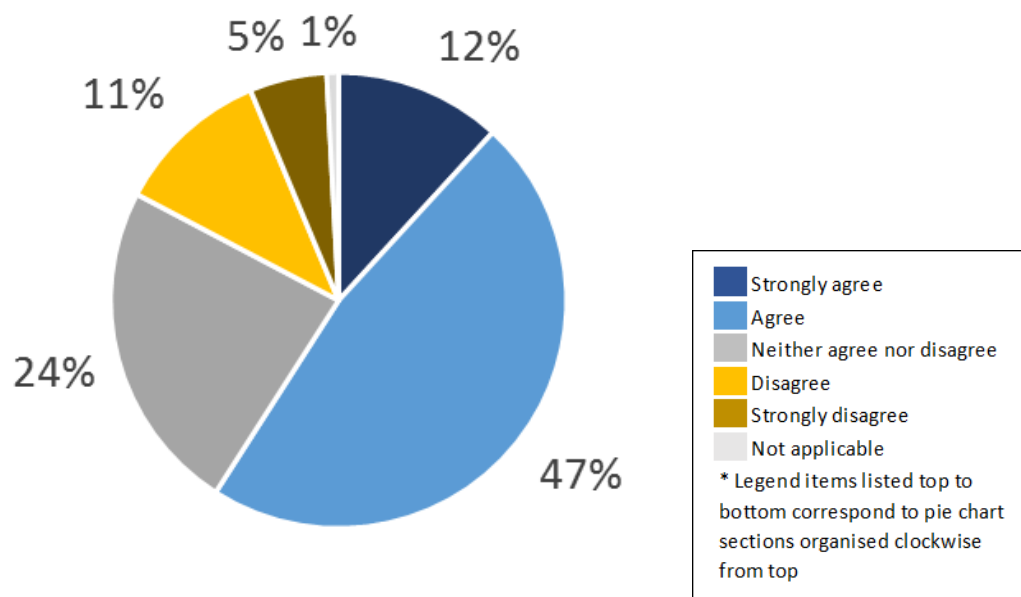
Note: Question 19 – Do you agree that it would be helpful to explore approaches to the calibration of academic output standards in different disciplinary and multi-disciplinary contexts?

65.   A range of challenges were highlighted, particularly stemming from the diversity of curriculum, programme design and assessment. It is clear that specialist, niche areas of provision will need particular consideration. Again concerns were often framed in terms of perceived burden and a confidence in the adequacy of the current arrangements.

66.   The majority of respondents agreed with the proposal to develop guidance for providers on a sensible range of degree classification algorithms.

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[17] 238 respondents answered the Likert-scale component of this question.

Figure 17: Responses to Question 22[18]
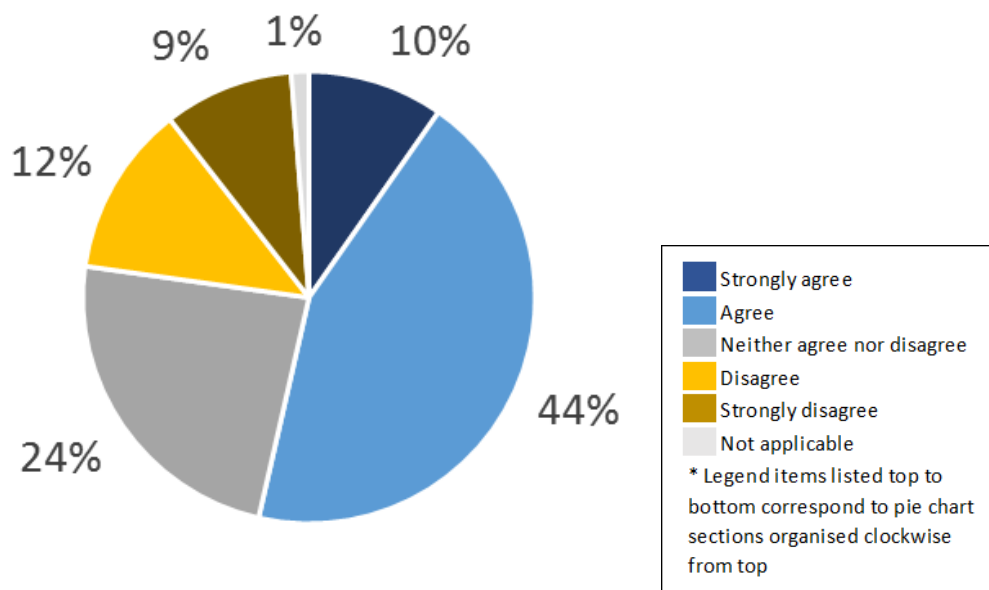
Note: Question 22 – Do you agree with the proposal to develop guidance to providers on a sensible range of degree classification algorithms at the pass/fail and 2i/2ii borderlines?

67. Of these, 19 comments said that guidance in this area would be welcomed and that it would need to be transparent, both in development and in its finished form. The emphasis of many responses was that the 'guidance' should not be mandatory or prescriptive, but guidelines for best practice. Others clarified that example algorithms would be helpful for those considering changing their current algorithms. While there was overall support for this question, responses from FECs, PSRBs and student organisations were particularly positive:

'…these ought to be more clearly defined and systematised to give students reasons for their degree specification that are less arbitrary.' (Student organisation)

Role of governing bodies

68. There is a closely balanced response on the specific proposal to place more emphasis on the role of a provider's governing body.

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[18] 238 respondents answered the Likert-scale component of this question.

Figure 18: Responses to Question 11[19]
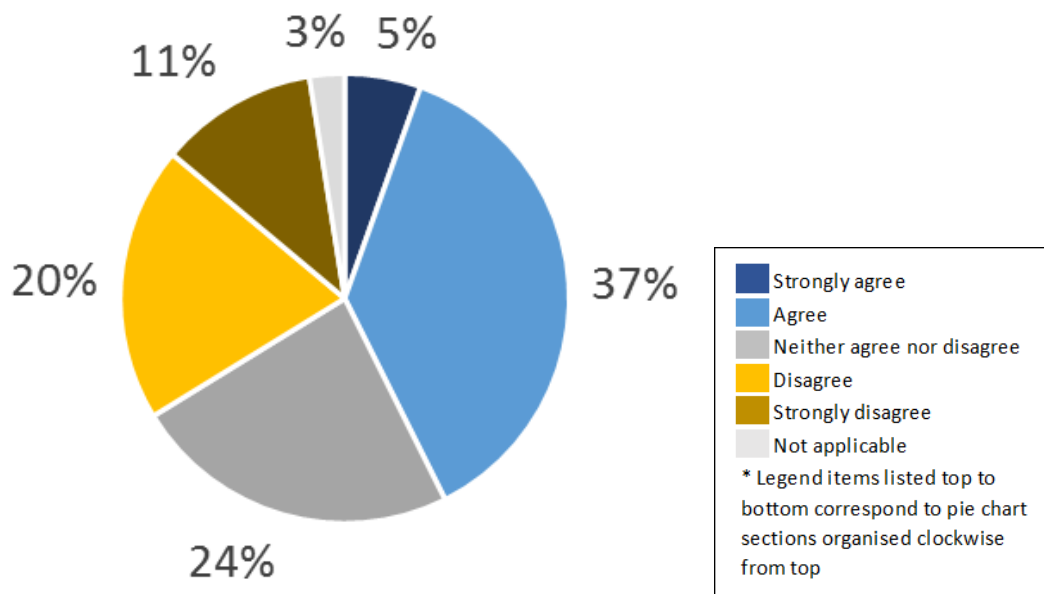
Note: Question 11 – Do you agree with the proposal that more emphasis should be placed on the role of a provider's governing body to provide assurances about the quality of the student academic experience and student outcomes in line with the Higher Education Code of Governance? If you agree, please indicate what, if any, additional support they should receive to provide such assurances.

Figure 19: Breakdown of responses to Question 11[20]
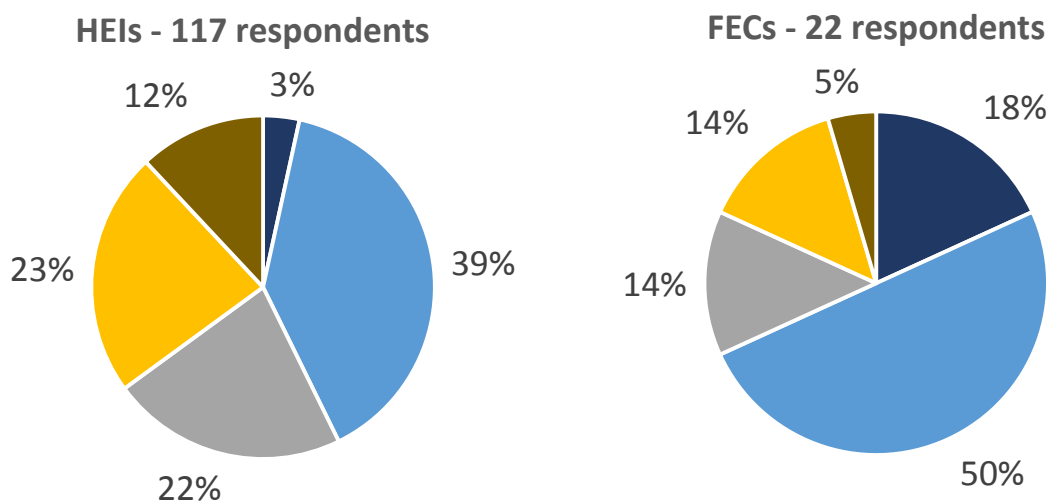
69.   More respondents agreed with this than disagreed, but the gap between 'agree' and 'disagree' was smaller here than for many other questions, and a significant number

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[19] 238 respondents answered the Likert-scale component of this question.
[20] Breakdown of the 139 publicly funded providers who answered the Likert-scale component of this question.

of respondents neither agreed nor disagreed. In their comments, these respondents tended to identify further issues for consideration and clarification before they would feel able to fully support the proposals.

70.   There was broad support for making use of the relevant section of the HE Code of Governance (and other Codes of Governance that providers use), and more than a third of HEIs explicitly said that they saw a way in which the proposal could work in concert rather than in conflict with existing academic governance structures. Some institutions noted that they already operated similar governance arrangements to those proposed.

> 'As our governing body is already responsible for the academic character of an institution, it is appropriate that it should also be the primary agency with responsibility for assuring academic quality within its own institution.' (Publicly funded HEI)

71.   FECs demonstrated greater levels of agreement than HEIs, which in turn were more positive than student organisations and some sector bodies (see Figure 19).

> 'Governance needs to concentrate [on] and [be] held accountable for the quality of teaching and learning and student outcomes far more than buildings and other matters'. (Publicly funded FEC)

72.   Views commonly expressed (over 100 comments), whether by those in agreement or disagreement, were:

> a.   The need to properly recognise the role and responsibilities of senates and academic boards in academic governance, and the potential for tension should a governing body become too closely involved in quality management activities.

> b.   Concerns about the capability and capacity of governing bodies in this area, including a need for training and support, and a review of the skills mix of members. A distinction was made between the experience necessary to make judgements about financial risk and those associated with academic quality, a related concern being that the building up capacity to address academic quality judgement might result in diminished capacity in other areas.

73.   Among those respondents that neither agreed nor disagreed with the proposal, the main consideration was the second of these two issues, with 22 comments amounting to almost three times as many mentions as any other issue. By contrast, there were only eight specific comments about the role and responsibilities of senates and academic boards in academic governance, and the same number addressed the potential cost implications for providers. There was less evidence that these respondents were explicitly concerned with issues concerning training burden or institutional autonomy.

74.   Respondents agreeing with the proposal often did so on the basis that the appropriate role for the governing body was verifying that institutional processes were in place to ensure robust institutional arrangements.

> 'We are confident in the ability of our governing body to undertake this role and in the ability of our internal quality assurance system to deliver the necessary evidence to enable this oversight to be meaningfully undertaken by our Senate and Council.' (Publicly funded HEI)

'We agree that institutions should be responsible for their own standards of quality and provide assurances to funding councils via reporting from governing councils.' (Sector representative body)

75.   In contrast, respondents who disagreed with the proposal feared that a consequence would be a 'blurring of the lines' in governance and managerial roles (13 comments), and that governing bodies would be drawn inappropriately into making academic judgements because of the requirement to provide assurances about student outcomes (nine comments).

'The Code of Governance makes it clear that governing bodies should not become involved in matters of academic judgement and consideration of student outcomes is not currently set out within current HE governance arrangements.' (Publicly funded HEI)

76.   Some 23 respondents expressed matters of principle about a perceived conflict of interests between governors' responsibilities for financial sustainability and institutional reputation, and a new quality assessment role. Although this point was seen as applying to all institutions, particular concerns were expressed about smaller providers being less able to avoid such conflicts (seven comments).

77.   Respondents (17 comments altogether) also requested clarity on one or both of the following:

- how the proposal would apply where there were complex arrangements such as an institution working in partnership with others

- how it would apply to providers with different corporate forms that might not conform to traditional higher education governance models.

78.   Over 50 commentators were concerned about how to ensure that cost and bureaucratic burden to institutions and to individual members of the governing body could be minimised.

79.   The potential role of external consultants to assist governing bodies in discharging these responsibilities generated 25 comments. Such comments tended to reflect concerns about new costs being placed on institutions, and the 'spawning of a new HE industry'.

'We are concerned about the suggestion that external consultants could be engaged to help them achieve this as this could add an extra layer of burden and cost to institutions, and could privilege some institutions' (Publicly funded HEI).

80.   Student representative organisations (30) held mixed views: a third agreed with the proposal, a third took a neutral position, and a third disagreed. Those agreeing with the proposal saw advantages in the governors becoming more explicitly involved in discussion of academic quality. The most common concerns expressed by student organisations were:

a.   That existing concerns about a relative lack of power for student members of governing bodies might be exacerbated by the proposals (11 comments).

'Any potential internal auditing process cannot come at the expense of student partnership, and thus a system must be designed with student participation in mind, actively addressing potential disparities of power between senior university management, governing bodies and students. It also must be designed to ensure the student voice is protected, upheld and influential within internal quality process.' (Student organisation)

b.   That a governing body might experience a conflict of interest in holding responsibility for financial and academic assurance, making it more difficult for the student voice to be heard (nine comments).

81.   Question 21 asked for views on placing more emphasis on the role of the governing body to provide assurances about the security and reasonable comparability of academic output standards. Views were evenly balanced here.

Figure 20: Responses to Question 21[21]
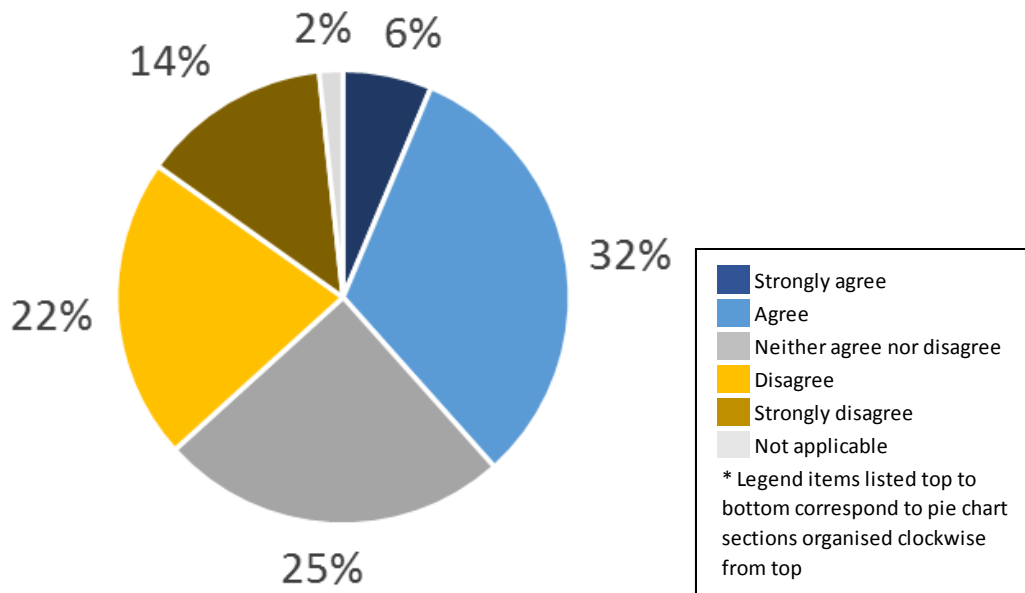
Note: Question 21– Do you agree with the proposal that we should place more emphasis on the role of the governing body of a provider with degree awarding powers to provide assurances about security and reasonable comparability of the academic output standards of students?

82.   Respondents, whether in agreement or disagreement, focused on the feasibility and appropriateness of providing assurances about the security and reasonable comparability of academic output standards. It was argued that while governing bodies could look at outputs on a year-by-year basis at institution level to avoid institutional performance drift, it would not be feasible for them to also compare across the sector.

'…the assurances provided by governing bodies would be that the standards of their institution are secure, "meet expectations" or are in line with a baseline/benchmark; they cannot comment on the comparability of standards,

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[21] 238 respondents answered the Likert-scale component of this question.

which would require a detailed overview of the whole sector. Having received relevant assurances from governing bodies, the funding bodies themselves would then be in a position to assure Government and other stakeholders that standards are comparable across the sector.' (Publicly funded HEI)

Use of existing accountability mechanisms

83.   We can see high levels of agreement with the proposal to use existing accountability mechanisms to seek and test assurances from a provider's governing body.

Figure 21: Responses to Question 12[22]
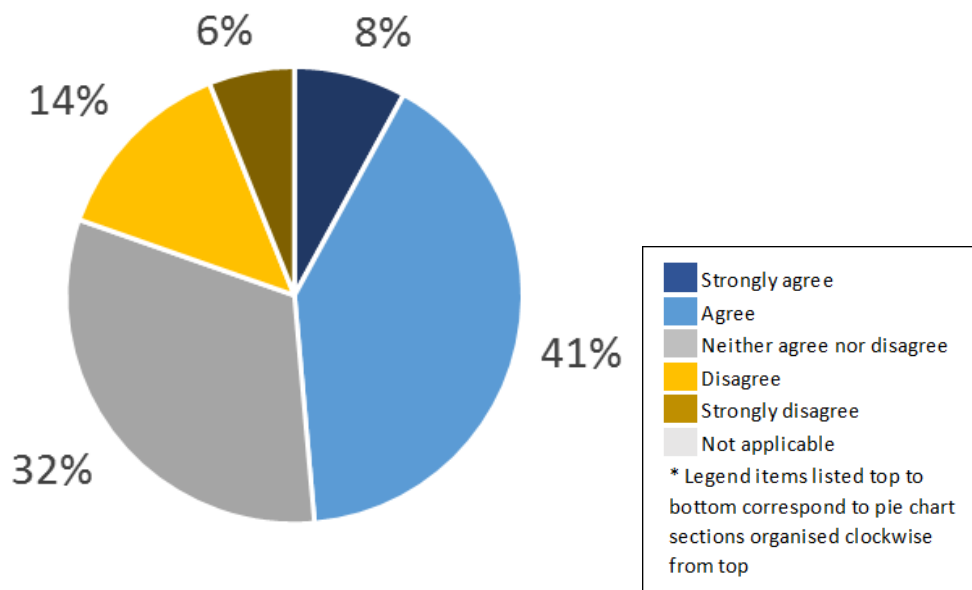
Note: Question 12: For England, do you agree that, for English institutions, HEFCE should develop and use the existing external accountability mechanisms, particularly the HAR, in the ways described?

84.   There was a noticeable split between the views of different groups of HEIs. Two-thirds of Russell Group members agreed or strongly agreed with the proposal, compared with just under two-thirds of University Alliance members, under half of Million+ members and under a quarter of GuildHE members.

85.   Respondents in explicit support of the proposals (35 with no supporting comments) agreed that it would be sensible to adapt existing mechanisms instead of developing new regulation tools. In this group, support was also expressed for the convergence of regulation methods. These issues were the most frequently reported in comments on this question (over 40 times across a range of stakeholders).

'It appears logical to utilise the existing annual accountability return to collect the quality assessment assurances and the five-yearly HAR light-touch visit to check the evidence and processes used in reaching these annual assurances.' (Publicly funded HEI)

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[22] 214 respondents answered the Likert-scale component of this question.

86.   One of the most frequently cited comments from all respondents (32 in total) was that the HAR should be 'light-touch' and, although adaptation would be required, any increased burden should be minimised so that the new process did not recreate the burden of the current Quality Assurance Agency for Higher Education (QAA) HE Review process. Most of these (23 comments), from both those agreeing and disagreeing, argued that the HAR would need significant adaptation, and noted the importance of pilot activity for this element of the proposals. It was suggested that piloting should ensure that the evidence provided to HEFCE through the annual accountability return and the five-yearly HAR was robust and fit for purpose.

> 'We are concerned that the HAR itself should not become a review of institutional processes.' (Publicly funded HEI)

87.   Of the 68 respondents that neither agreed nor disagreed, 12 provided no explanatory comments. Many (FECs and student organisations in particular) found it difficult to comment in detail and said that they had no direct experience of the funding bodies' accountability mechanisms. However there was still clear support for a lighter-touch approach that drew on existing funding body accountability processes, and which aligned with the broader regulatory requirements for different types of providers (nine comments), with the proviso that clarity should be provided on how this might work in practice.

> 'What are the implications for institutions bound by other external accountability mechanisms, e.g. those developed by churches for ministry training?' (Publicly funded HEI)

88.   FECs demonstrated greater levels of agreement than HEIs, which in turn were more positive than student organisations and some sector bodies.

89.   A small minority identified concerns about the conflation of the roles of 'funding body' and 'quality body'. Generally, the narrative comments cover similar territory regardless of agreement or disagreement, and there is a tension between those who warn us not to replicate the burden of the current QAA Higher Education Review (HER), and those who wish to see the key features of the HER introduced into the HEFCE Assurance Review visits in England. There was a noticeable split between the views of different groups of HEIs, but agreement that any burden should be minimised.

When things go wrong

90.   There was strong support for rapid investigation and, as appropriate, intervention through external peer review, where there was evidence that something was going wrong within an individual provider.

Figure 22: Responses to Question 23[23]
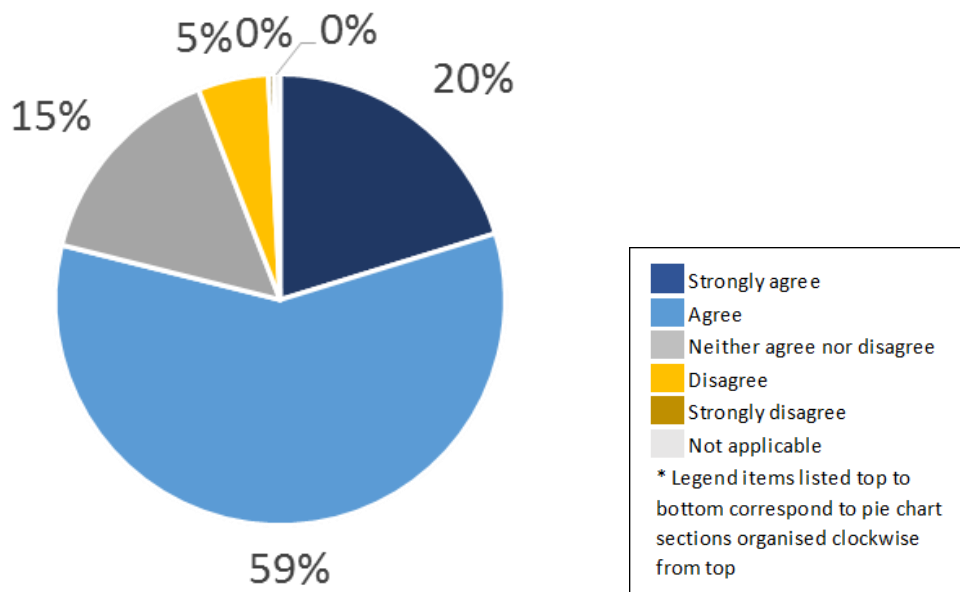
Note: Question 23: Do you agree with our proposals to develop and implement a strengthened mechanism to investigate rapidly when there is an indication of serious problems within an individual provider which has not been addressed in a satisfactory and timely manner?

> 'Any new system must have rigorous processes in place to ensure that interventions are measured, appropriate and swift when things do go wrong' (Student organisation)

> 'It seems self-evident that an effective system of quality assessment should have recourse to interventionist options when there is evidence of problems' (Publicly funded HEI)

91.   There was a strong message that students and student unions required a clear avenue to trigger a review. This was raised 11 times by student organisations, all of whom agreed with the proposal. There was also a recommendation that the detailed design of this aspect of the proposals should place an emphasis on students (three comments).

92.   Respondents were less persuaded that such an investigation should always be accompanied by a re-testing through external peer review against the baseline requirement for quality unless the circumstances warrant this, but there was still overall support for this proposal provided that clear criteria for triggering re-testing were in place.

International activities

93.   There was very significant support for the inclusion of a provider's international activities in the proposed approach, with respondents frequently confirming that UK standards should apply wherever the provision is delivered and that preserving the UK's global reputation in higher education should be a central pillar of any new system.

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[23] 238 respondents answered the Likert-scale component of this question.

Figure 23: Responses to Question 15[24]
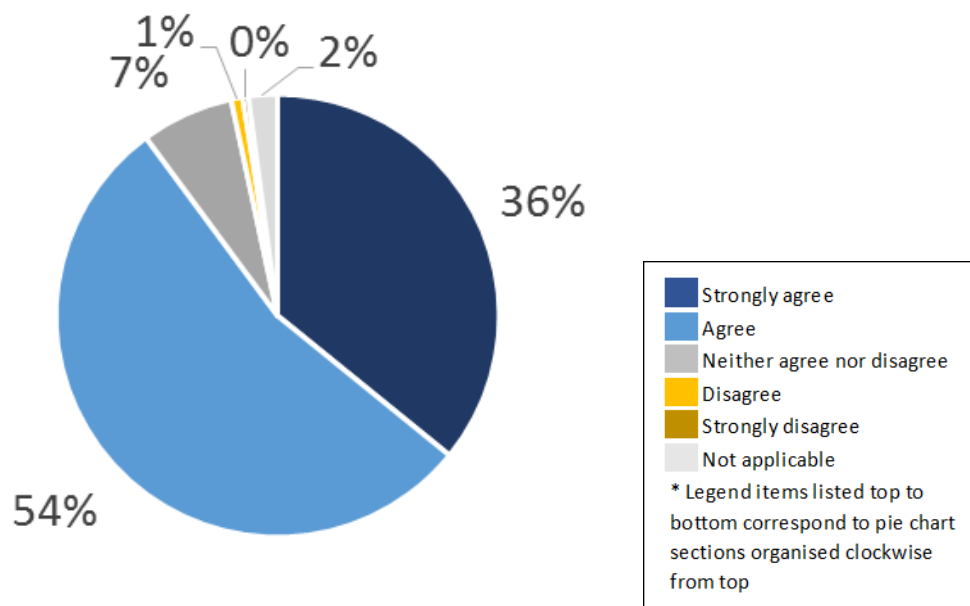
Note: Question 15: Do you agree that international activities should be included in the remit of future quality assessment arrangements as described?

94.   Some respondents discussed the benefits of having a system that enabled comparisons between different locations of study in the UK and internationally, and others noted the principle that UK institutions have a responsibility for students registered on their programmes regardless of where or how they study. Many respondents specifically commented on the need for the new system to account for the diversity of local regulation and processes abroad, and to recognise that UK institutions involved in delivering provision outside of the UK had to meet the requirements of a range of different systems and jurisdictions.

95.   International activity was perceived by a relatively large number of respondents, despite their agreement to the proposals, as representing higher risk and greater complexity than UK-based provision.

Other cross-cutting issues

Teaching Excellence Framework

96.   The consultation proposals did not include any questions about the development in England of the Government's Teaching Excellence Framework (TEF). However, a large number of providers, sector representative bodies and student organisations made references to the TEF in response to one or more questions. These comments tended to cover areas such as the use of peer review and responsible metrics, both of which were endorsed. It is also clear that there is a strong desire for the QA and TEF proposals to be designed and implemented as a single coherent system. We intend to share our analysis of consultation responses with those in the Department for Business, Innovation and

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[24] 238 respondents answered the Likert-scale component of this question.

Skills working on the design of the TEF to ensure that we continue to work closely together on such a single system.

Student engagement

97.   A large number of respondents commented on the benefits of student involvement and engagement across the full range of quality assessment activities, and the progress in this area over recent years. Many stakeholders called on the funding bodies to ensure that meaningful approaches to student engagement, which recognised the diversity of the student body, were embedded in the new arrangements.

98.   Student organisations were particularly keen to develop a system which might allow for some form of independent student assessment, which would be provided as part of any accountability arrangements.

Maintaining a UK-wide framework

99.   A small number of respondents explicitly called for greater clarity about how the proposals would avoid UK policy divergence and fragmentation, and there was widespread consensus that it was important to continue to uphold the reputation of UK HE internationally.

The current arrangements

100.   There was some limited support for aspects of the current arrangements. A very small number of respondents questioned the rationale for the funding bodies' review of quality assessment and asked whether the current arrangements necessarily required an overhaul. Although the consultation did not specifically ask questions in this area, a small minority of respondents suggested that having an independent national body (whether the QAA or another) providing guidance and expertise on quality assurance would continue to be valuable.

Cost and burden

101.   HE providers raised some issues about the cost implications of the proposed arrangements. These themes were raised in relation to the proposals on external examining, the development of existing funding body accountability mechanisms, and the role of governing bodies. Many respondents sought confirmation that the proposed arrangements would not re-create the burden of the current HER process.

102.   There were some concerns about new costs being placed on institutions, and the 'spawning of a new HE industry' in private organisations providing external consultancy to governing bodies.

Piloting and design

103.   Respondents used the opportunity to offer to participate in pilot activity, comment on specific areas that they wished to see considered further during the design phase, and also to draw attention to areas that they felt required more attention through continued dialogue with stakeholders. Respondents focused on four elements to consider in the detailed design phase:

a.   Ensuring QA and TEF proposals were designed and implemented as one single coherent system, and that external peer review featured in this system.

b.	The development of the use of student outcomes data and metrics, and of a shared understanding of what constituted a high quality student academic experience in different contexts (including for postgraduates, in collaborative arrangements and international provision).

c.	The need better to articulate how student engagement and partnership would be embedded across the different elements of the proposals.

d.	Developing a meaningful set of baseline requirements for entry to the HE sector that aligned with those required by professional bodies, with the European Standards and Guidelines, and with the Home Office's requirements for meeting the needs of Tier 4 sponsorship.

Views particularly relevant to the context of Wales and Northern Ireland

104.	Responses from across the three countries called for a reasonable degree of consistency across the UK nations, to protect the student interest and maintain the brand of UK HE in attracting students nationally and internationally.

Wales

105.	Some of the issues raised related to the implementation of the Higher Education (Wales) Act from September 2015, and uncertainties about how the new arrangements would affect the sector. There was a concern that the concomitant timing of the Act and the consultation on quality assessment had limited the capacity of Welsh providers to provide a full response.

106.	Some concern was raised about the rationale for change and whether the argument had been made effectively for any substantial change away from the current system. The potential reputational damage to the UK HE brand internationally was highlighted, but in a context of general agreement that quality assessment in Wales should remain aligned to the approaches taken in England and Northern Ireland.

107.	In general, responses accorded with wider UK responses in relation to practical concerns about the impact of changes to the registering and training of external examiners. However, there were particular issues raised in relation to Welsh language requirements and compliance with the 1993 Welsh Language Act. In particular, respondents focused on how the proposals for strengthening external examining would take account of Welsh-medium provision, and how the need for examiners with Welsh fluency would be captured and recorded in any register of external examiners. There was recognition that further work with the Welsh Language Commissioner might be required.

108.	There was recognition of the successful partnership working of the Welsh Government, the National Union of Students Wales and HEFCW, in taking forward work on student partnership via Wise Wales, and it was hoped that the new arrangements would provide opportunities for this work to be extended and embedded further.

Northern Ireland

109.	Responses were received from the Northern Ireland universities, further education colleges, student representative bodies, and one specialist college. While all of their responses addressed UK-wide issues and were included in the overall analysis, they also answered a number of region-specific questions.

110.   Due to the relatively small size of the sector in Northern Ireland a quantitative analysis of these would be of no benefit. In fact there was no identifiable uniform or consistent approach in response to the proposals. However, there was broad agreement on a number of key points including:

- support for a unified UK-wide quality assessment system

- concern about the potential damage of the changes to the UK higher education brand

- support for continued use of a common Quality Code, albeit in a revised form

- opposition to any proposed regional variations, as there was a concern that this might increase burden and reduce comparability across the sector

- importance of linking any new systems with the proposed Teaching Excellence Framework.

111.   In common with the wider UK responses, the Northern Ireland respondents expressed some concerns relating to the proposals to strengthen the external examining system and the proposed changes to the role of a provider's governing body.

Part B: Analysis by question

Background

Why did the higher education funding bodies consult?

112.   As part of their respective statutory duties, the three higher education (HE) funding bodies in England, Wales and Northern Ireland have been seeking views on future approaches to assessing the quality of education in the universities and colleges they fund or are considering funding. References to 'we' in this document refer to the three funding bodies: the Department for Employment and Learning Northern Ireland (DELNI), the Higher Education Funding Council for England (HEFCE) and the Higher Education Funding Council for Wales (HEFCW).

113.   The Quality Assessment Review was designed to be forward-looking and to ensure that arrangements remain fit for purpose for the next decade. The funding bodies were clear that future arrangements must retain the confidence of students, employers, government and the wider public; and must be flexible and responsive to a sector that is continually evolving and which may look very different in the future. In particular, the international reputation of the UK higher education system must be maintained in this increasingly diverse context.

114.   The June 2015 consultation[25] heralded the second phase of a review of quality assessment (QA) which began in October 2014. During phase one, from January to March 2015, we invited students, the HE sector, professional bodies and other stakeholders to participate in a wide-ranging dialogue through a series of meetings and events, and by responding to a discussion document[26] published by the Quality Assessment Review Steering Group which was established to oversee the review and provide advice to the funding bodies[27].The second-phase consultation built on the work from phase one, and set out specific proposals for future arrangements for quality assessment.

When and how did the HE funding bodies consult?

115.   The Quality Assessment Review phase two consultation was published on 29 June 2015 (www.hefce.ac.uk/reg/review/) along with the following supporting documents:

   a.   'A review of external examining arrangements across the UK' by the Higher Education Academy (HEA).

   b.   'The cost to providers in England of existing quality assurance and quality assessment practices' by KPMG.

   c.   'The future of quality assessment in higher education: Analysis of responses to phase one of the quality assessment review' by MRUK.

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[25] 'Future approaches to quality assessment in England, Wales and Northern Ireland: Consultation' (HEFCE 2015/11) can be viewed online at www.hefce.ac.uk/pubs/year/2015/201511/.

[26] See www.hefce.ac.uk/reg/review/discussion/.

[27] The Quality Assessment Review Steering Group is chaired by Professor Dame Shirley Pearce. See www.hefce.ac.uk/reg/review/sg/.

> d.   A report on roundtable discussions in the first phase of the review.

116.   The consultation closed on 18 September 2015 in England and Northern Ireland and on 31 August 2015 in Wales[28].

What were the proposals?

117.   The consultation proposed a common framework for future approaches to quality assessment across England, Wales and Northern Ireland. The differing national contexts provided different flavours to the proposed implementation of future approaches in each country. The consultation set out proposals in six areas:

- principles for a quality assessment system for established providers

- student academic experience for established providers

- academic output standards for established providers

- 'when things go wrong' in established providers

- excellence and innovation in learning and teaching

- gateways into the higher education system for new providers.

118.   The proposals sought to recognise the implications of the changing nature of the higher education landscape. This led the funding bodies to propose options that differ in some respects from current arrangements, and that place more emphasis on the responsibility of autonomous providers to safeguard academic standards and the quality of the student learning experience, in the context of their own diverse missions and the diverse needs of their students. At the same time the proposals sought to ensure that assurances can be provided to students, Government, taxpayers and other stakeholders in the areas that are important to them. The proposed role of the funding bodies here is to routinely monitor data and other intelligence, to collect and test assurances from providers, and to intervene rapidly and in a proportionate way when there is evidence of a problem. The intention was to achieve this shift in focus without placing a disproportionate and costly regulatory burden on providers who could provide evidence of continuing safe custody of standards and quality.

Methodology used to analyse responses

119.   This was an open consultation, and stakeholders were invited to share their views on 28 consultation questions using an online form. Twenty-five of the questions were in two parts, allowing respondents to identify their level of agreement with the proposals on a five-point Likert scale, and to provide optional supplementary comments. Three questions were more open-ended.

120.   The consultation received 252 written responses, with submissions from organisations and individuals across the UK as set out in Figure 24 and Table 1. Of these responses 238 were submitted through the online survey. The responses provide a rich evidence base for further reflection, and the many thoughtful and detailed comments will

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[28] Given the implications of the HE (Wales) Act, the consultation closing date for Wales was Monday 31 August 2015. This is because the consultation was undertaken under the Further and Higher Education Act 1992 powers, which were repealed in Wales from 1 September 2015.

be used to inform the next stages of the review. We are particularly pleased to have received a large number of responses from individual student unions.

Figure 24: Numbers of respondents by type of organisation (all nations)[29]
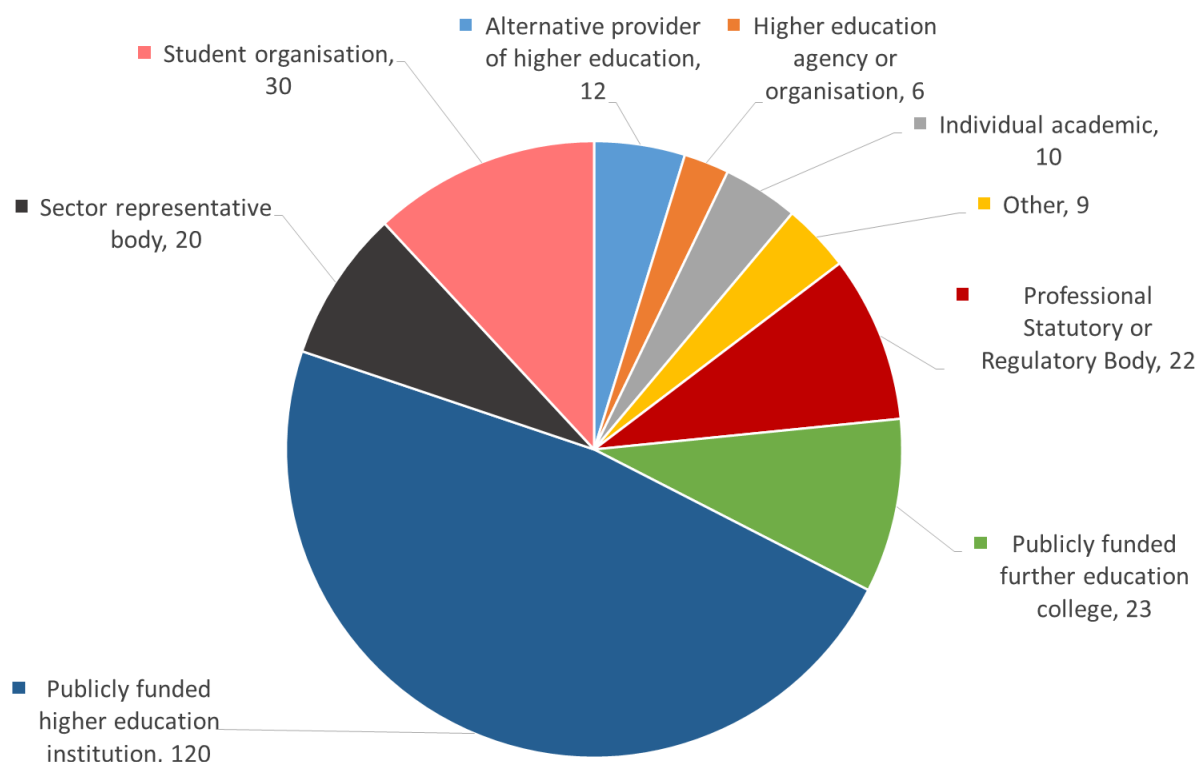
121. The regional distribution of responses to the online survey revealed that the vast majority of stakeholders who responded were based in England (194), with lower numbers based in Wales (12), and Northern Ireland (five), reflecting the size of the HE sectors in these countries.

Table 1: Numbers of responses to QA consultation by type and nation

	England	Wales	Northern Ireland	All	Other	Total
Publicly funded higher education institution	105	9	2	1	3	**120**
Publicly funded further education college	22		1[30]			**23**
Alternative provider of higher education	10	0	0	2		**12**
Professional, statutory or regulatory body	6	1		14	1	**22**
Sector representative body	9	1	1	7	2	**20**
Higher education agency or organisation	2	0	0	3	1	**6**

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[29] Total 252 respondents. The pie chart includes the single response from an individual student in the 'Other' slice.
[30] This single response was submitted by Colleges NI acting on behalf of the six FECs in Northern Ireland.

Student organisation	27	1	1	1		**30**
Individual academic	8			2		**10**
Individual student	1					**1**
Other	4			4		**8**
	194	**12**	**5**	**34**	**7**	**252**

122. The number of responses and broad range of respondents demonstrate a high level of interest and engagement with quality assessment issues.

123. Five consultation events were delivered in England and Wales, with a total of 260 delegates. The events were centred on discussion sessions to allow delegates greater opportunity to put forward and debate the issues relevant to their institutions and organisations.

124. Work on the consultation analysis has been conducted by the HE funding bodies, advised by staff with particular expertise in quantitative and qualitative analysis, and building on the experience gained during phase one of the review.

125. We have undertaken a quantitative analysis using responses made on the five-point Likert scale for each question. This analysis is represented by the pie charts for each question in Part B of this document. We also used the demographic information collected from respondents to identify areas where different respondent types provided meaningfully different views.

126. We have also conducted a qualitative analysis of the free text responses. This analysis has been particularly important in analysing **why** people do or do not agree with the proposals. In particular, for questions with a large proportion of 'neither agree nor disagree' responses, we have used the free text comments to explore why this option was chosen. Throughout this analysis process, judgement has been used to interpret comments, group comments by theme, and to determine emphasis.

Question 1: Do you agree with our proposed principles to underpin the future approach to quality assessment in established providers?

Figure 25: Responses to Question 1[31][32]
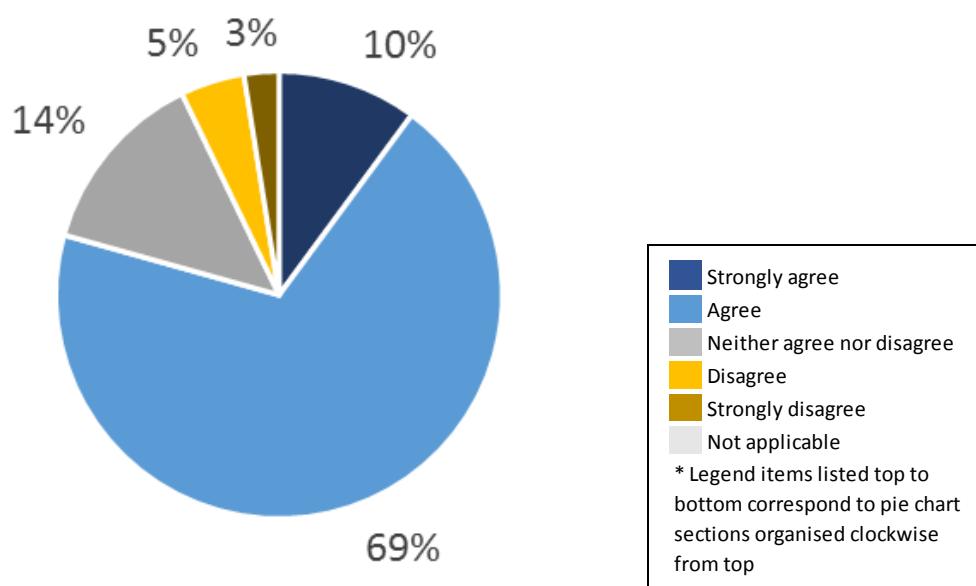
127. The majority of respondents either agreed or strongly agreed with the proposed principles.

> 'In broad terms, these principles appear to provide an appropriate underpinning for the future approach to quality assessment.' (Publicly funded higher education institution (HEI))

128. Of those in agreement with this proposal, 76 either made no comment or reiterated the importance of certain principles. Where comments were made they tended to be observations about a particular principle, how a principle might be implemented, or the relative importance of individual principles. For example, 77 respondents made comments supporting various aspects of the principles, including 18 who cited the importance of student partnership and 13 who commented on the recognition of institutional autonomy. There was little clear consensus in terms of particularly important themes.

129. Of those respondents who agreed with the proposal, 43 expressed some concerns or reservations relating to the implementation of other proposals in the consultation and their effect on these principles, for example an increased use of metrics. A further 32 respondents commented on the need for clarification in certain areas or on the meaning of terms such as 'established provider' or 'co-regulation'.

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[31] 238 respondents answered the Likert-scale component of this question.
[32] This figure reproduces Figure 2 in Part A.

130. Further comments among those respondents in agreement with the proposal expressed a number of points, including that:

- protecting the reputation of the UK HE system was of key importance, with a need to maintain, as far as possible, read-across for the whole UK system

- the autonomy of providers should underpin approaches to quality assessment

- diverse and different missions must be properly recognised

- the principle of expecting that students be meaningfully integrated in quality assessment arrangements must be fully translated into future practice

- peer review and external scrutiny remained important core components of quality assessment approaches

- the removal of repeated retesting of an established provider against baseline requirements, unless there was evidence of a problem, was an important innovation and would reduce the burden on providers

- past institutional performance was not always a reliable indicator of future risk, and any risk-based approaches would need to acknowledge this, particularly when 'lagged' indicators were used to inform regulatory action

- innovation in learning and teaching should be 'encouraged' rather than 'not be prevented'.

  'There is an opportunity within the proposals to recognise the specificity of HE in FE, which the present QA approach in practice, if not in theory, struggles with'. (Publicly funded further education college (FEC)).

131. Of the 32 respondents who neither agreed nor disagreed with the proposed principles, eight offered no indication of the reasons behind their choice. Of those making comments, eight mentioned the need to ensure that the Teaching Excellence Framework (TEF) and QA arrangements were integrated. A further six respondents made comments supporting some form of cyclical review.

132. Just 17 respondents disagreed with the proposed principles. Disagreement appeared to relate to a specific principle or principles, rather than to all of the principles or broad direction of travel.

'No. While [name redacted] can welcome a number of the proposed principles, we specifically do not agree with principles C and H' (Sector representative body)

'Our core issue stems from University's governing bodies having oversight of academic standards as many governing bodies are far removed from actual teaching and do not have the knowledge to carry out a thorough review.' (Student organisation)

Question 2: Do you agree that our current proposals for the use of meaningful external scrutiny as set out above are sufficient? If you do not agree, please indicate what additional or different external scrutiny you propose and provide the reasons for this.

Figure 26: Responses to Question 2[33]
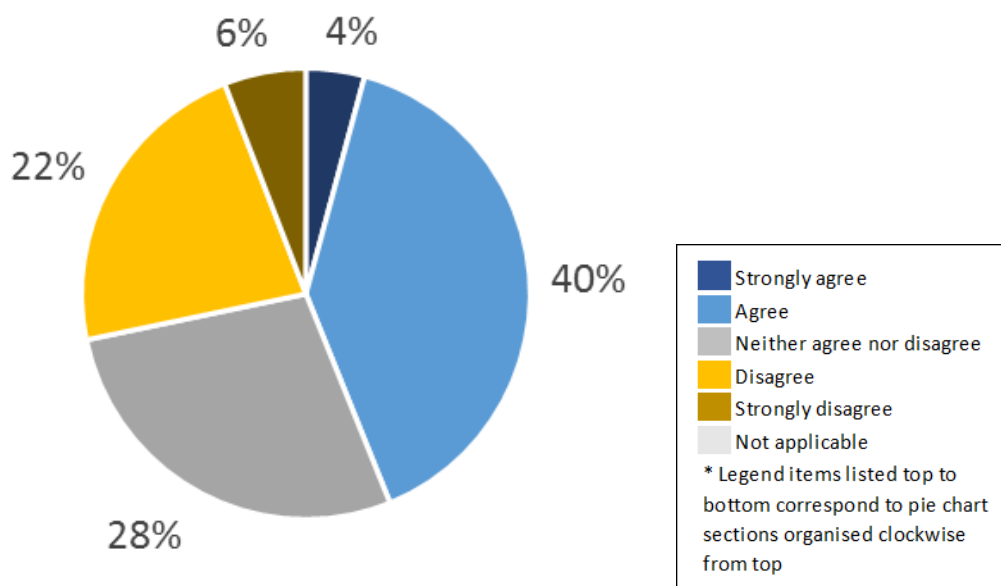
133.   There was agreement with the proposed pattern of external scrutiny from 104 respondents. Agreement was often qualified, either with specific concerns or with questions about how individual elements of the proposals would work in practice. A large number of the respondents who indicated that they neither agreed nor disagreed with the proposals, also tended to express support for the principle behind the question.

134.   Those respondents indicating some support for the proposals focused, in particular, on:

- the aim to reduce bureaucracy and regulatory cost (16 respondents)

  '…the unnecessary and unhelpful burden placed on providers by the current arrangements.' (Publicly funded HEI)

- the external scrutiny of student outcomes rather than institutional processes

- external peer review against a baseline requirement for quality for new entrants to the sector

- intervention where there is material evidence of a serious problem in an individual provider (10 respondents).

135.   Several respondents agreed with the general approach to embedding externality, but expressed concern that the proposals risked increasing bureaucracy and regulatory cost. Across all respondents to the consultation 15 comments were made on this point.

136.   Specific concern was expressed (19 comments) in relation to the potential burden which might arise from the external examining proposals. The proposals for greater

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[33] 238 respondents answered the Likert-scale component of this question.

involvement of professional, statutory and regulatory bodies (PSRBs) attracted 38 negative comments.

137.   A total of 29 comments reinforced the need for meaningful student involvement in the quality assessment system, with some stressing that this would be important in all elements of the proposals. The majority of these views came from student organisations, but other types of respondents agreed. In particular, there were requests for more information about how students would be involved, to assuage concerns that there was not currently a sufficiently clearly defined role for students.

138.   In a few cases, respondents welcomed the emphasis on the responsibilities of autonomous providers for the quality and standards of their own provision.

>   'We welcome the intention to move the oversight of scrutiny of quality and academic standards to institutional governing bodies and believe the major source of assurance should come from institutions themselves.' (Publicly funded HEI)

139.   Conversely, 15 respondents expressed concerns that the proposals for the calibration of degree standards and for the review of degree classification algorithms contradicted institutional autonomy.

>   'While we welcome the later suggestion of more structured collaboration to support comparability of degree standards, we do not believe consistent degree classification algorithms (bullet 3) could be achieved without imposing a national assessment system to underpin those algorithms, thereby undermining the institutional autonomy which is captured in principle a.' (Publicly funded HEI)

140.   Of the 67 who indicated that they neither agreed nor disagreed with the question, a large number (27) partially agreed with the premise behind the proposal or supported some particular elements, but wanted to register concerns or ask for further information.

>   'Broadly yes, the university believes that external scrutiny should focus on areas that matter to students and other stakeholders whilst reducing the amount of bureaucracy and regulatory cost that is currently imposed on the institution.' (Publicly funded HEI)

>   'We have indicated that we neither agree nor disagree, since we are more in favour of some aspects of the proposal than others.' (Publicly funded HEI)

141.   Responses to this question by those who neither agreed nor disagreed also tended to reintroduce arguments that the respondent had made elsewhere. Such respondents were particularly concerned by proposals on making greater use of PSRB outcomes (13 comments) and on the role of governing bodies (27 comments). Of the respondents who neither agreed nor disagreed, 21 also mentioned fears about the proposed reforms of the external examining system, with 10 specifically focusing on issues related to increased burden and costs. It is clear that the issues on this question expressed by those only in partial support, reflected concerns in these areas raised elsewhere.

142.   The question asked respondents to indicate what additional or different external scrutiny they would propose, and to provide the reasons for this. Only a handful even of those respondents who disagreed with the proposals provided this additional information.

Of those who did, one respondent made the following proposal in relation to standards and external examining.

> 'The sector could learn from the standardisation processes adopted in other education sectors (for example, for the marking of public examinations operated by examining boards) in which examiners are trained to standardise their marking by attending standardisation meetings.' (Publicly funded HEI)

143. Another respondent made the following suggestion in respect of the governing body proposals.

> 'With respect to the institution-wide view, perhaps there is a role for a number of independent external assessors who could each work with the governing bodies of a number of institutions to support them in their quality assurance role, and provide an independent external view.' (Sector representative body)

144. An additional respondent suggested increased flexibility in externality.

> 'We would welcome a system whereby HEIs had flexibility in how they chose to meet expectations around externality: for instance where guidance and/or review could be commissioned from a range of providers in line with a statement of recognised practice (as institutions do currently for financial assurance).' (Publicly funded HEI)

145. In relation to external involvement when things go wrong, another respondent suggested that, while intervention at an early stage might prevent the later risk of serious issues in relation to academic standards or the student experience:

> '…mechanisms should be put in place upfront to reduce the likelihood of such intervention, for example external involvement in international partnership approval processes.' (Publicly funded HEI)

146. A small number of respondents expressed doubts about the external scrutiny to be provided by governing bodies in the consultation proposals: 22 comments were made about the proposed increased role of governing bodies, and a similar number of comments queried whether governing bodies could act in a fully independent and impartial manner. A further 22 comments were made about the potential training requirements of governing bodies. Fourteen comments expressed concerns about shifting emphasis from academic boards to governing bodies. Eight respondents also indicated that currently not all governance processes are based on the HE Committee of University Chairs and Association of Colleges codes of governance. (Many of these points were made in Questions 11 and 21.)

147. Concern was expressed (38 comments) about the proposed role of PSRBs, including the need to recognise the diversity of PSRBs (see Question 20). Respondents stressed that PSRBs had differing objectives and scope and operated in different ways.

148. A number of comments (40 in total) identified concerns about the proposals for the calibration of degree standards and for the review of degree classification algorithms (see Questions 19 and 22). Of these, one particular area of concern was that these elements of the proposals, while providing externality, would infringe institutional autonomy (15 comments). There was also a concern that it was not possible to calibrate degree

standards (four comments). Sixteen respondents expressed the importance of maintaining the reputation of UK HE in a number of different contexts.
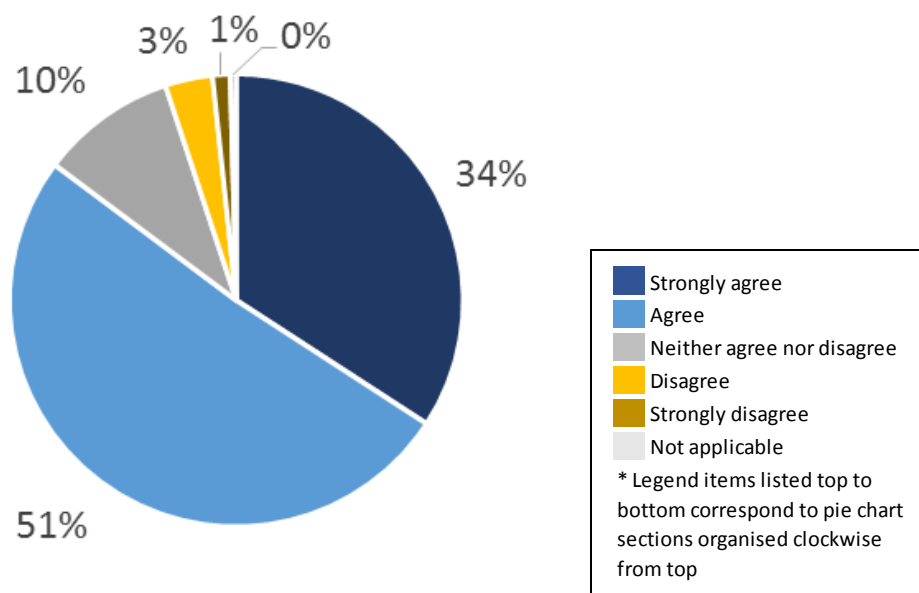
149. The proposals for developing a baseline requirement for the quality of the student academic experience, and for investigation when things go wrong, were broadly accepted as providing appropriate externality (see Questions 23 to 25). Just six negative comments were made about this proposal. A number of respondents also spoke of these elements in the context of needing to maintain the reputation of UK HE.

150. Some respondents (10 comments) sought more detail about the ways in which the funding bodies proposed to integrate appropriate external advice into their independent assurance processes. Another 15 comments stated that the quality assessment function should remain separate from the work of the funding bodies.

151. A small number of respondents took the opportunity to highlight aspects of the current quality assessment arrangements that they did not want to lose. For example, 15 respondents commented specifically on the importance of peer review, and eight expressed particular concerns about reforms to the UK HE Quality Code. These views tended to come from those who had argued in response to other questions for the retention of repeated cyclical peer review carried out by an 'independent' agency or, to a lesser extent, for the retention of the Quality Code in its current form.

Question 3: Do you agree that future approaches to quality assessment should be based on an assumption that 'one size' can no longer sensibly fit all?

Figure 27: Responses to Question 3[3435]

Legend:
- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not applicable
- * Legend items listed top to bottom correspond to pie chart sections organised clockwise from top

Pie chart values: 34%, 51%, 10%, 3%, 1%, 0%

152. A very significant majority of respondents either agreed or strongly agreed with the proposal. The 153 respondents who made further comments endorsed the arguments in

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[34] 238 respondents answered the Likert-scale component of this question.
[35] This figure reproduces Figure 3 in Part A.

the consultation document about the implications of increasing diversity of provider, provision, and students, particularly in the English higher education system.

153. Of the respondents in agreement with this proposal, 51 commented on the diverse nature of UK HE, which they viewed as a strength to be encouraged.

> 'We agree that assessment must not lead to uniformity: there must be sufficient flexibility in the evidence base institutions must produce to demonstrate quality.' (Sector representative body)

> 'There are wide ranging variations in the types/size/focus of institutions delivering HE therefore there is a need to have flexibility whilst still ensuring agreed standards are being met' (Publicly funded FEC).

154. Frequent comments from respondents in agreement related to setting baseline requirements for quality, with the need for a common set of core standards and criteria for all providers mentioned 39 times. Nineteen respondents made reference to the need for flexibility while still ensuring that baseline quality requirements are met.

> 'The university welcomes this important and positive proposal as appropriate for an increasingly diverse HE sector. However, recognition of diversity and the need for a flexible approach to quality assessment, appropriate to the needs of a diverse range of providers, does not obviate the need for a single overarching framework that clearly articulates the expectations all providers are required to meet.' (Publicly funded HEI)

155. Respondents in agreement with the proposal also commented repeatedly (17 times) on the implications of the increasing diversity of the student population:

> 'Students now come from more diverse backgrounds and non-uniform experiences, and with differing aims. If institutions are to meet their expectations and the needs of their future employers, they cannot be constrained by needing to meet an inflexible set of criteria. What may be "quality" in one circumstance may be inappropriate in another.' (Sector representative body)

156. A small number (seven) of respondents in support of this proposal also commented on the importance of appreciating the potentially disproportionate burden of regulation on smaller, newer and private institutions. In similar territory, five respondents challenged the assumptions they believed governed judgements about where 'risk' might be found in a diverse sector.

> '…there is a concern that such statements are usually taken to mean that systems should be more burdensome/frequent for alterative/new providers than for established ones, with an automatic assumption that existing providers are not "risky" unless something clearly goes wrong, whereas for alterative or new providers the opposite is the case. We would wish to challenge this assumption.' (Alternative provider of HE)

157. Twenty-three respondents neither agreed nor disagreed with this proposal. Many of the responses in this category agreed with the principle, but sought further information or expressed concerns regarding implementation.

'It is difficult to respond to this highly leading question with anything other than "yes, of course". But we do not believe that the current or previous UK quality regimes have in fact represented "one size fits all"; and we do not believe that a single approach with a flexible quality code would represent "one size fits all".' (Student organisation)

158.   Eight of those who neither agreed nor disagreed made comments relating to the need for retaining a common set of core criteria and standards across the sector.

'Students and employers have expectations about higher education and to that extent the assumptions for quality assessment for higher education must cover all higher education provision' (Publicity funded HEI)

159.   The only other theme present among respondents who neither agreed nor disagreed (four comments) was recognition of the need to take the diversity of the sector and providers into account in future quality assessment arrangements.

'The university agrees that "one size" does not necessarily fit all and that a quality assessment system should take cognisance of the diversity missions, student profiles etc.' (Publicity funded HEI)

160.   Of those respondents who disagreed with this question, five were concerned that a system capable of accommodating diversity might be perceived to produce and endorse varying levels of 'quality' across the sector, which could adversely affect the reputation of the UK higher education system.

Question 4: Do you agree that there should be a baseline requirement for the quality of the academic experience for students, and that this should be published and maintained?

Figure 28: Responses to Question 4[36][37]
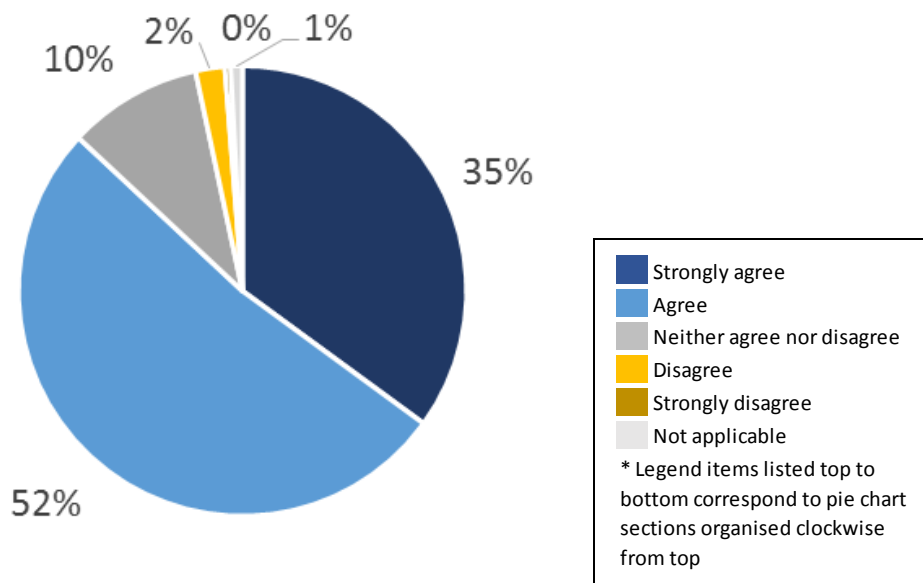
[36] 238 respondents answered the Likert-scale component of this question.
[37] This figure reproduces Figure 6 in Part A.

48

161.   The overwhelming majority of responses agreed that there should be a baseline requirement for the quality of the academic experience for students.

> 'This would demonstrate a strong commitment to consistency in academic practice, and would allow new entrants to the sector a transparent benchmark. It may also aid public confidence in higher education quality.' (Student organisation)

162.   Where respondents made further comments, these were often focused on more detailed arrangements for developing and implementing such a baseline requirement, and included the following suggestions:

- it should be developed in close consultation with the sector and with students (the importance of sector consensus on this issue was highlighted)

- students would have an important contribution to make to its development, and it would need to be accessible and clear to students and non-specialists;

- it should reflect the student academic experience in a diverse system

- it should reflect the UK sector's strong position in the global market, and several respondents argued that any baseline must not be set too low

- it should recognise the existence of other requirements – for example the Competition and Markets Authority (CMA) guidance – rather than duplicating these, and should be reviewed regularly to ensure continuing relevance

- the burden of implementing it should be kept to a minimum for providers.

163.   One response supporting a set of baseline requirements, put it succinctly in the following terms:

> 'It must be specific, measurable, achievable, realistic.' (PSRB).

164.   The Quality Code was mentioned in 66 responses to this question. Of these, 39 were positive about the Quality Code, with 16 respondents in favour of keeping the Code in some form, or using it as a starting point, rather than starting from scratch.

> 'The UK Quality Code for Higher Education – which has been developed by the sector over several years – is a good starting point for this baseline.' (Publicly funded HEI)

165.   Using the Quality Code as a baseline was discussed in a further 25 responses.

> 'We would support the continued investment in the maintenance of the UK Quality Code, its review, revision and ongoing development as a suitable set of reference points for establishing a 'baseline' academic experience.' (Publicly funded HEI)

166.   A smaller number again (three) were explicitly critical of the Quality Code, stating that it was too vague and that its 'tick box' approach lacked credibility as a core element of a quality assessment system.

167.   This question also prompted a series of views about the idea of 'students as consumers'. A small number of responses (four) supported the principle of linking quality assessment more explicitly to the student academic experience, and discussed favourably the idea of students as 'consumers' to whom institutions were accountable:

> 'This baseline requirement should be grounded in consumer requirements and not institutional requirements' (Student organisation)

168.   Balancing arguments were made by a couple of providers who were concerned about the consequences of such a 'consumerist' view of higher education:

> 'The recasting of students as consumers making a purchase that is embedded in the CMA guidelines does not encourage students to perceive themselves as partners in learning, but as purchasers of degrees, and may tend to lower academic standards by ignoring the importance of independent learning. Quality Assurance processes should encourage institutions to challenge students, which students will not always like.' (Publicly funded HEI)

169.   The very small minority of respondents (six, of which five were personal rather than organisational opinions) who disagreed with the proposal to develop a baseline requirement expressed reservations regarding the difficulty of defining a baseline for quality.

170.   Of the 24 respondents who neither agreed nor disagreed with the proposal, two made no comment as to their reasons. Among those who did there was a wide spectrum of views and arguments. For example, nine respondents felt that they needed further information on the development and implications of the baseline before making a judgement.

> 'We are cautious about how this 'baseline requirement' would be defined and measured' (Publicly funded HEI)

171.   Three other respondents who neither agreed nor disagreed assumed that the proposal was referring to the Quality Code, and tailored their response to fit this assumption.

> '"Quality of academic experience" is very vague, and a "baseline requirement" correspondingly so, but we assume this refers essentially to the Quality Code' (PSRB)

Question 5: For England, do you agree with the proposal that an individual provider, once it has passed the gateway for entry into the publicly funded system in England, should not be repeatedly externally retested against the baseline requirements for an acceptable student academic experience, unless material evidence suggests otherwise?

Figure 29: Responses to Question 5[38][39]
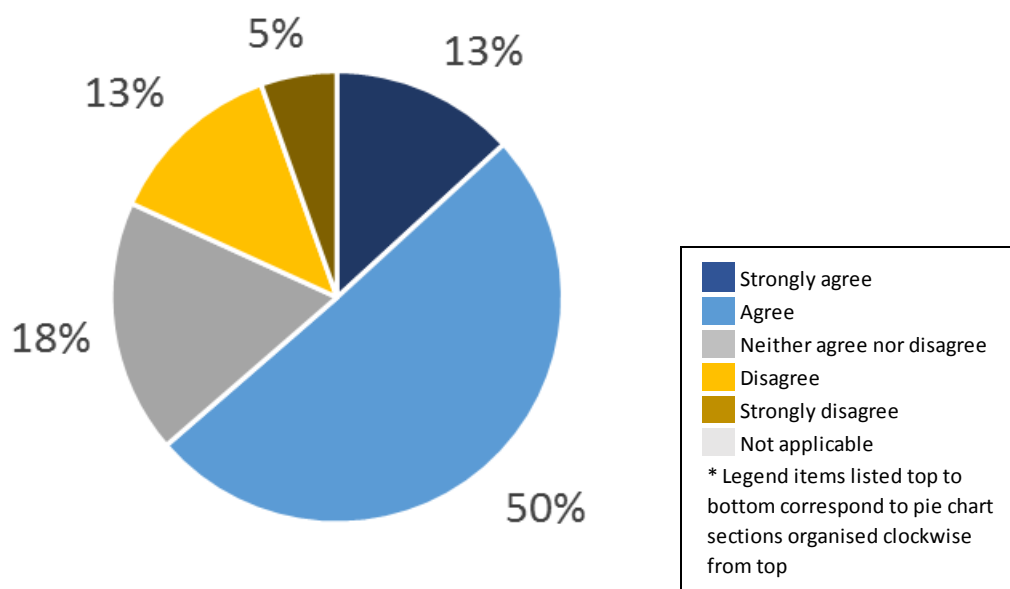
172.   The majority of respondents agreed or strongly agreed with this proposal.

'This seems like a sensible proposal and meets the requirement for good quality assurance whilst managing the burden associated with a quality assurance process.' (Individual academic)

'The university is strongly supportive of the proposal to end cyclical retesting against the existing baseline requirements.' (Publicly funded HEI)

173.   Agreement with this question was much less qualified than on some of the other proposals, with 36 respondents offering no comments. Where comments were made they tended to provide suggestions on implementing the proposal. Many of the additional comments made by those agreeing with the question were also made by respondents who disagreed.

174.   There was broad agreement from across the spectrum of respondent types, including 78 higher education institutions, 16 further education colleges, 10 sector representative bodies and nine student organisations.

175.   The most common response to this question from all respondents (32 comments in total) related to what would constitute 'material evidence' that institutions no longer met the baseline requirements for an acceptable student academic experience. A further 23

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[38] 220 respondents answered the Likert-scale component of this question.

[39] This figure reproduces Figure 9 in Part A.

comments related to how material evidence would be flagged, while the time frame between issues arising and investigation was cited as an issue by five respondents.

> '…any form of system that involves triggered reviews must have rigorous processes in place to ensure that interventions are measured, appropriate and swift when things do go wrong' (Student organisation).

176. A large number of respondents (29) suggested that closer monitoring, or scrutiny, would be appropriate under some circumstances, for example during a probationary period for new entrants.

> 'The baseline standard should not represent a prohibitive barrier and a sliding scale of external oversight should be used to support providers to develop appropriate academic governance and internal review standards.' (Sector representative body)

177. The role of students in the quality assessment process (especially in flagging 'material issues' to the funding body) was raised by several student representative groups, as well as by some HEIs and FECs (nine responses in total).

> 'Any such system must have plain and clear guidance for how students and students' unions highlight issues within their education, and a process by which students and students' unions have the power to trigger a review.' (Student organisation)

178. Among the respondents who disagreed with this proposal, 19 respondents believed that repeated cyclical review should be retained.

> 'External review provides a measure of trust in the higher education sector, and enables students to fundamentally influence quality enhancement policy and practice.' (student organisation)

179. However, 10 of these respondents also recommend that the current arrangements for repeated cyclical review should be reviewed and streamlined to address concerns about the perceived burden on providers and, in particular, a sense that there was a diminishing return for long-established providers.

> 'The current Higher Education Review methodology unhelpfully focuses on QA processes rather than their effectiveness, is overly bureaucratic and burdensome and is of limited use to institutions in terms of outcomes.' (Publicly funded HEI)

180. Of the 40 respondents who neither agreed nor disagreed, nine made no comment as to their reservations. Those who did make comments wanted further information on what would constitute 'material issues' or noted the need to ensure sufficient testing or scrutiny for new entrants to the market (eight and ten responses respectively).

> 'It may be prudent to retest new entrants into the system every three years (on entry, after three, and six years providing outcomes are successful at each and every review) as it is these new providers that present the greatest risk to the reputation of UK higher education.' (Publicly funded HEI)

181.   A further six respondents who neither agreed nor disagreed sought further information about setting and maintaining baseline requirements prior to making a judgement. Further areas of concern were the need to align with the TEF and the need for an expectation of improvement in the arrangements (four responses each)

Question 6: For Northern Ireland, do you agree that providers should provide annual evidence and assurance that they are meeting the baseline requirements for an acceptable student academic experience?

182.   The respondents who chose to answer this question were predominantly providers based in Northern Ireland and other organisations operating on a UK-wide basis. The number of responses is therefore only 37. Responses differ according to the type of respondent.

183.   There was particularly strong agreement from student organisations (three). One student organisation used the opportunity to request better resourcing of student unions and highlighted that students in Northern Ireland were disadvantaged as they lacked recourse to the Office of the Independent Adjudicator (OIA). Student organisations also pointed out that, unlike in England, there was no real HE 'market' to drive up quality.

> 'Regardless of any ideological considerations, it is clear that the more "marketised" and "consumerist" approach to incentivising providers – to offer a "high-quality student academic experience and excellent student outcomes" – prevailing in an English context is unlikely to work in Northern Ireland due to the small size of the sector and geographical considerations.' (Student organisation)

184.   The Northern Ireland HEIs that responded (two) disagreed with the proposal, suggesting that providers with a strong track record in quality assurance should not be required to provide annual evidence of meeting baseline requirements, and calling for consistency of treatment with other providers across the UK.

Question 7: Do you agree that the funding bodies' verification of an institution's review methodology provides a reasonable mechanism through which to operate risk-based scrutiny of a provider's arrangements to secure a good and improving student academic experience and student outcomes?

Figure 30: Responses to Question 7[40][41]
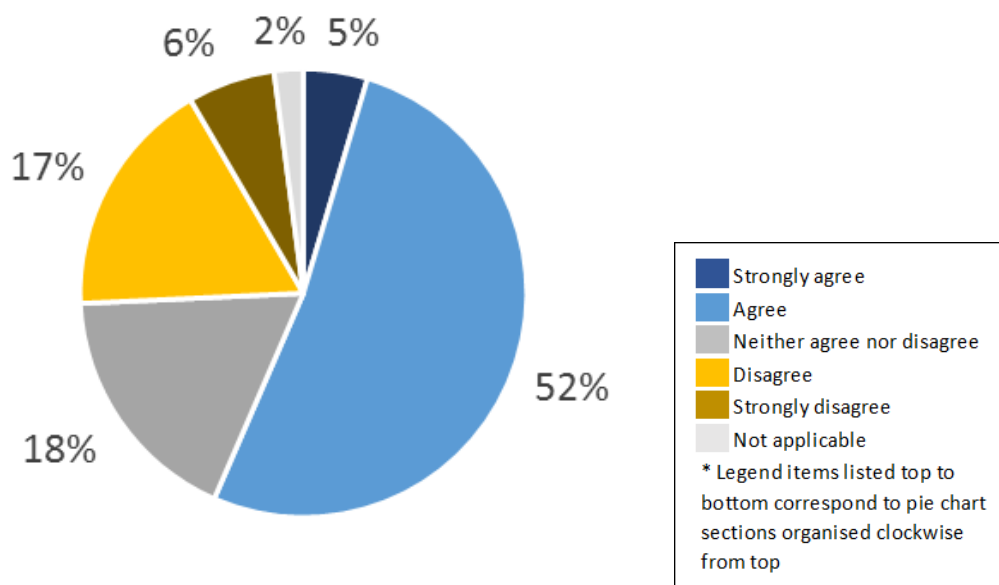
185.   There was strong support for this proposal. Forty-two respondents chose to leave no comment, of whom 29 agreed with the proposal. However, a number of comments (29) sought further clarification on a number of issues.

> 'We agree that this provides a reasonable mechanism as long as an institution operates a robust internal process, complemented by a sufficiently strong element of external scrutiny which has clear and sufficiently sensitive 'triggers' to address situations where institutions no longer comply with baseline requirements.' (Publicly funded HEI)

186.   Delivering a robust method of verification was important to many respondents, being mentioned in 46 comments, although respondents who disagreed overall were twice as likely to comment on this. These comments overlapped with others on the detail of the methodology, the role of the funding bodies and the expertise and capacity needed to deliver the necessary verification.

187.   A concern for those disagreeing with the proposal centred on verification, with the exception of those who disagreed because they felt the proposals infringed on institutional autonomy.

> '…confirmation in the annual accountability statement isn't enough, there should be some form of evidence sent to prove that any and all annual reviews that were due

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[40] 238 respondents answered the Likert-scale component of this question.
[41] This figure reproduces Figure 11 in Part A.

to take place did, and to document the outcomes and actions from these. Then if an action doesn't happen and HEFCE is called in to deal with a problem arising from that, there is evidence that it was noted previously and had not been dealt with, therefore increasing accountability to the institution.' (Student organisation)

'We believe that autonomy of an HEI should mean that its quality assurance mechanisms do not require verification from the funding body but if this is to proceed, there should be some mechanism for testing the effectiveness of these mechanisms.' (Publicly funded HEI)

188. A number of respondents supported the principle that an institution should undertake its own internal reviews, with 24 explicit comments to this effect. Many of these noted that institutions already had robust internal review mechanisms in place. In this context, there was some optimism that the proposed changes would lead to a more coherent and less burdensome risk-based framework for quality assessment, while others noted that an internal review system would only be effective with external verification to ensure that robust systems and processes were in place.

'Funding bodies should ensure through the verification process that institutional arrangements are aligned with appropriate mechanisms to detect and deal with problems.' (Publicly funded HEI)

189. The role of the funding bodies in the proposed verification process was commented on in 34 instances. Of these, eight explicitly supported the proposed use of the existing HEFCE accountability framework:

'HEFCE already has a responsibility to evaluate the soundness of governance of institutions (as part of annual assurance processes and the five-yearly accountability review) and this could be extended to include the governance of quality and academic standards.' (Publicly funded HEI)

190. Others, particularly those expressing overall disagreement with the proposal (nine comments), were less persuaded by the arguments for the role of the funding bodies.

'It is not fully clear how the independence of quality review from funding can be safeguarded in a system in which scrutiny and verification are the responsibility of the funding body' (HE agency or organisation)

191. Ensuring that the burden of this proposal would be kept to a minimum, through a streamlined process aligned with other reporting and external processes, was mentioned by 21 respondents, the majority of whom agreed with the proposal.

192. Implementing the proposal without infringing institutional autonomy was understood to be important. Comments about autonomy were noted in 18 instances and were interwoven across many key areas.

193. Some student bodies, however, had a nuanced view about the interaction of autonomy and other important issues:

'Institutional autonomy cannot come at the expense of student partnership or robust external scrutiny, and thus an internal quality system must be designed with student participation in mind, actively addressing potential disparities of power

between senior university management, governing bodies and students' (Student organisation)

194. Respondents who neither agreed nor disagreed generally mirrored responses from those registering agreement and disagreement, in terms of the range of themes addressed. Those respondents who neither agreed nor disagreed expressed broad agreement for the principle behind the proposals, but felt that it would be challenging to maintain the necessary careful balance between institutional autonomy and delivering a robust level of verification.

'Whilst we support the principle of using institutions' internal processes, we consider that the proposals need further development to ensure that the future system is sufficiently robust, and there are no unintended consequences. The proposals may require institutions to reconsider the current format of their internal review procedures and how the outcomes are reported within their academic governance structures' (Publicly funded HEI)

195. Some respondents who agreed with the proposal highlighted some elements that they felt were key to the proposal. Their agreement was often accompanied by a request for more information on plans for implementation, for example:

- the way the proposal was envisaged to apply to validated or franchised provision (six comments)

- the way in which the activities of PSRBs would be taken into account, particularly in a context where there is significant variation in the approaches and practices of individual PSRBs (eight comments).

196. Often the comments related to the design of a provider's own review process rather than to the proposed verification process. The following concerns were relevant to providers' review processes:

a. A flexible risk-based approach was commented on 21 times, and included the need to reflect local circumstances, the diversity of providers, and the nature of their provision. Respondents suggested that a methodology should be based on a core set of principles, with flexibility around these. This was of particular importance for providers in Wales and Northern Ireland. There was some consideration of ways in which a provider might identify differing levels of academic risk, with suggestions to focus these judgements on areas such as collaborative provision, historical trends, or the maturity of the provider.

b. A prominent area, which 34 respondents commented on was the involvement of students. Comments included a need to work in partnership with students, having a specific remit for the involvement of students and students' unions, and practicalities about how meaningful integration might be possible. The comments on students were consistent across all levels of agreement. The duty of direct accountability to local students was commented on. Student unions identified the key role of students' representative bodies in enabling such student engagement.

c. The use of appropriate external scrutiny was highlighted in 34 comments. They noted that this needed to be independent so as to provide reliable outcomes and generate trust in the process. External peer review was identified as a particularly critical element. There was also support for increased involvement of others external to the provider, such as employers, international reviewers and students.

d. The development of good practice case studies was commented on five times and seen as a useful idea, particularly if these outlined different but effective approaches to internal review.

e. There was cautious support for the use of metrics, and discussion about the role of the funding bodies and others to help develop such data, demonstrated in eight comments.

Question 8: Do you agree that student outcomes data should provide the basis for continuous improvement activities within an individual provider?

Figure 31: Responses to Question 8[42][43]
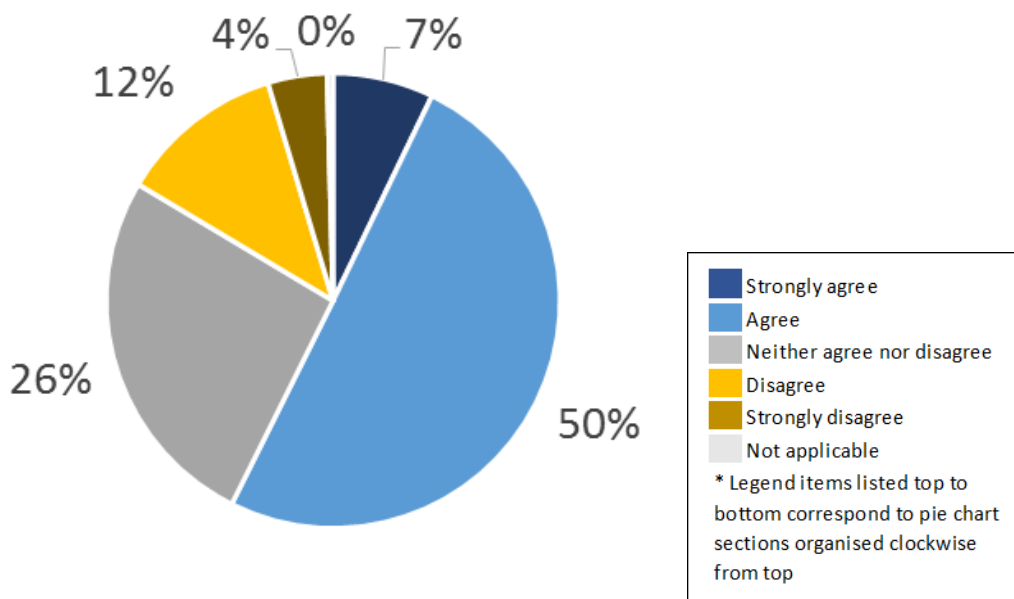
197. Most respondents agreed that student outcomes data was an important element of improvement activities. There was relatively little active disagreement: indeed it seems that the question was treated as an axiomatic statement to which caveats might be added, rather than as an area for exploration. There was very little difference between the focus of the comments attached to differing levels of agreement. Of the 35 respondents who did not add comments, 23 agreed with the proposal.

198. The most frequent comment, made 81 times, was that student outcomes data should be 'a basis', rather than 'the basis' for continuous improvement activities.

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[42] 238 respondents answered the Likert-scale component of this question.
[43] This figure reproduces Figure 10 in Part A.

However, concerns were also expressed (70 comments) about the robustness and limitations of current student outcomes data, including the National Student Survey (NSS) and Destinations of Leavers from Higher Education survey (DLHE).

> 'It is critical that the relationship between student outcomes, institutional process and institutional context is understood (within and outside an institution). We would be concerned if the work to be taken forward looks to manipulate existing student outcomes data (e.g. degree outcomes or DLHE).' (Publicly funded HEI)

199.   There were also calls in 46 comments for further exploration of the need to produce a more robust set of student outcome metrics.

> 'Before any decision is made on the role that student outcomes data plays in providing the basis for continuous improvement activities, specifically what is meant by student outcomes data needs to be provided, and a robust justification given for the measures used. (PSRB)

200.   These overarching opinions were underpinned by suggestions on the additional data that could be included, with over 200 comments on individual qualitative measures and potential context considerations. Common concerns here were for institutional context to be fully recognised, including: student type and characteristics; mission; provision type and size; geographical location and reach; and subject.

201.   The current use of student outcomes data for internal institutional reflection was commented on in 38 instances. Respondents expanded on this, saying it should continue to be used in this way.

> 'We would wish any internal review processes to continue to consider ways in which quality processes support the enhancement of student outcomes, albeit in a more proportionate manner.' (Publicly funded HEI)

> '[FECs] are used to this and believe that it does significantly affect the students' experience.' (Publicly funded FEC)

202.   The proposed shift away from a focus on institutional processes and towards an outcomes-driven focus was explicitly welcomed in 15 comments.

> 'it is incredibly important that any new regime focuses on academic outcomes rather than institutional processes' (Student organisation)

> 'the move from a process approach to a student outcomes approach is sensible' (Publicly funded HEI)

203.   Concerns about using student outcomes data for external comparison were raised in 26 comments, with some highlighting the potential for misleading comparisons if a provider's context was ignored.

204.   'Responsible metrics' were specifically mentioned by three respondents. Suggestions for useful metrics for quality assessment included:

- retention data

- Black and minority ethnic attainment gap data, as a way of measuring student effort

- international and transnational students

- the number of women progressing to postgraduate education

- academic attainment

- academic attainment of protected groups – such as those with a declared disability

- investment numbers in infrastructure and staff

- qualitative data from students and other stakeholders (such as employers, or professional representative bodies).

205. Of the 63 respondents who neither agreed nor disagreed, seven did not leave a comment. Of those who, commented over half (29) felt that student outcomes should not be the only data used for continuous improvement. A similar number of comments concerned the limitations of student outcomes data (24 comments) and suggestions that qualitative data should be included (21 comments). These themes mirror those raised by respondents who agreed or disagreed with the proposal. This is also true for less frequent comments, although one exception is that respondents who did not agree demonstrated slightly more concern over the time lag in the current data sets (19 of the 22 comments about this came from these groups).

206. Several issues were raised by both those who agree and those who disagree with the proposals:

a. The limitations of data collection systems need to be understood and accounted for. For example, further education colleges do not have the same type of relationship with the Higher Education Statistics Agency (HESA) as higher education institutions.

b. Viewing data as a trend was seen as important in 15 instances, to protect against temporary blips negatively affecting a provider.

c. The student outcomes data currently measured is geared towards the undergraduate experience, and has little to say about postgraduate provision (16 comments). A few respondents suggested that the Postgraduate Research Experience Survey and the Postgraduate Taught Experience Survey should be considered.

d. Collaborative provision, or provision which validated by another provider, was commented on three times in relation to the use of metrics.

e. The opportunities to game the data should be minimised (24 comments).

207. Some currently available metrics were mentioned in respondents' comments, including NSS (40), DLHE (31), HESA (11) and Key Information Sets (four). Many of the comments mentioned multiple metrics. Comments that were positive or neutral (nine comments) included those about NSS, DLHE and HESA. One respondent requested a balance between the different metrics, and another that the linkages should be carefully considered in the design of this aspect of the proposals. It was also acknowledged that these metrics were currently under review.

208.   The most frequent comments on the NSS and the DLHE (sometimes together) included that the datasets were crude, volatile, limited and subjective (14 comments). This was followed by concerns that the datasets were not suitable to cover the whole sector as they were designed for and still work most effectively with more traditional institutions (larger providers with young student populations) and were therefore less able accurately to reflect smaller independent providers and FECs. In addition these types of providers are less familiar with the datasets (eight comments, four applying only to NSS). One respondent also commented that they do not have access to the NSS raw data and therefore cannot analyse it usefully for internal discussions. Three respondents raised additional concerns about the DLHE data's time lag and the single point of data collection six months after graduation. In addition, two respondents suggested an additional data collection point three years after graduation.

209.   Many respondents commented on the relationship between the metrics used for QA and TEF.

Question 9: Do you agree that we should take forward into detailed design and pilot phases further work on the use of student outcomes data to identify patterns and trends and on the development of approaches for monitoring and supporting institutions as they address areas of concern?

Figure 32: Responses to Question 9[44][45]
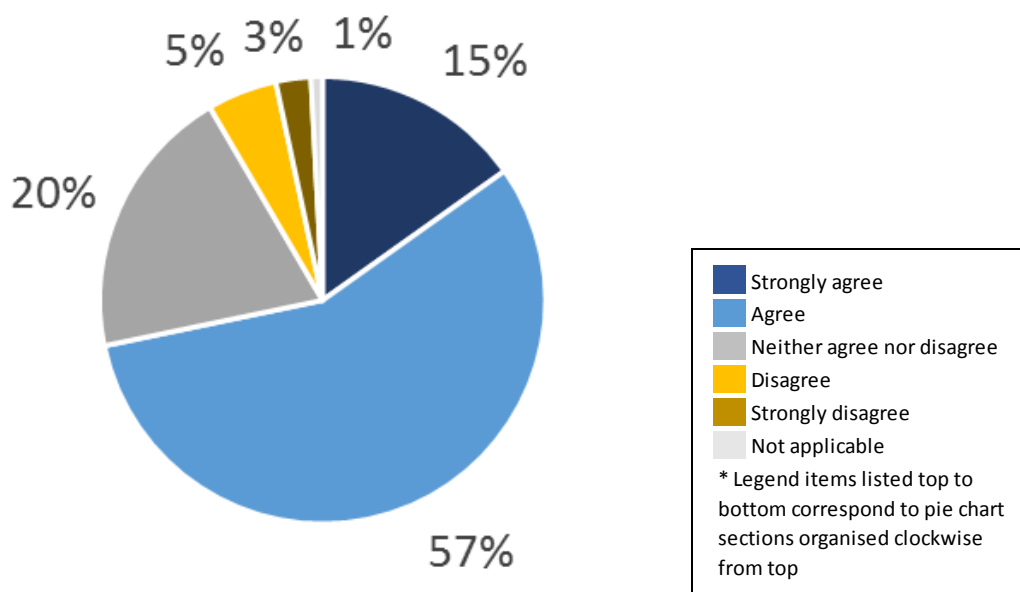
210.   A total of 170 respondents supported this proposal. Where respondents provided additional comments, these tend to duplicate and follow on from those made in relation to Question 8. Fifty-two respondents left no comment. Therefore paragraphs 211-16 focus on additional points raised.

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[44] 238 respondents answered the Likert-scale component of this question.
[45] This figure reproduces Figure 12 in Part A.

211.   There is a definite appetite, if not expectation, for further work to be done in this area, with a total of 83 respondents commenting on the need for further development and detail in the form of consultation, piloting, or further research. A number of respondents (21) commented that data definitions, standards and processes must be decided in partnership with the sector to ensure the data is robust and all implications are well understood.

> 'It would be sensible to gather the views of institutional planning teams in the design and the piloting of the use of student outcomes data.' (Publicly funded HEI)

212.   Of the 48 respondents who neither agreed nor disagreed with this proposal, 11 gave no reason for their selection. Comments made by the remaining 35 respondents followed a similar pattern to those of respondents as a whole. For example, 13 (27 percent) made comments in relation to the importance of context when using student outcome data compared with 72 (29 percent) of all respondents. while 11 (23 percent) commented on the need for further development work around this data compared with 83 (34 percent) of all respondents.

213.   Among the respondents who either disagreed or strongly disagreed with this proposal, the appropriateness of available data was a key concern (eight responses), as was the view that student outcomes data should be considered as forming only part of the basis for continuous improvement activities (nine responses).

> 'Such information should provide "a", not "the", basis within the context of an overall QA system. In particular, we would reiterate that the output of a sensible peer review process is just as vital.' (Publicly funded HEI)

214.   Respondents, whether agreeing or disagreeing, suggested a number of issues for consideration during a detailed design phase:

a.   Pilot activity should include a diverse range of providers, provision and students to ensure that the metrics do not privilege certain providers, learners, modes, institution sizes, disciplines, locations, or economic contexts.

b.   Thought should be given to how data can be compared between UK nations and internationally. This is to ensure that all students, including international ones, can have a quick sense of the best providers.

c.   It will be important to test how data should be collected and applied to collaborative provision. Transnational education could also be considered in the pilot.

d.   Qualitative data collection should also be piloted, to see whether meaningful trends can be discerned and to understand how such data can support the process (seven).

e.   Pilot activity should capture any evidence of unintended consequences (two). This should include how certain measures may put different learners and institutions at an advantage.

215.   Respondents, again whether agreeing or disagreeing, highlighted other concerns including:

a.   Whether current data was an appropriate basis for exploring issues and concerns.

b.   Whether increased resources would be required to collect, analyse and store the data necessary for such an exercise. If a set of meaningful metrics were set up that captured all the necessary intricacies of the current and future sector landscape, might it replace rather than reduce burden?

c.   Whether governing bodies had the necessary quantitative expertise to query and challenge institutional metrics appropriately.

216.   The views expressed by respondents from devolved nations did not differ from those relating to England. Respondents in Wales and Northern Ireland asked to be involved in design and piloting activities. These responses also identified a need for indicators to take account of national context: for example, Welsh institutions already report how many students are taught in the Welsh language.

Question 10: In Northern Ireland, do you agree with the approach outlined to introduce more effective and consistent arrangements for collecting and analysing feedback from higher education learners?

217.   The respondents (36) who chose to answer this question were predominantly providers based in Northern Ireland and other organisations operating on a UK-wide basis. The number of responses is therefore very small.

218.   Of those who did respond, the majority (21) were in agreement, and none expressed disagreement with the proposals.

219.   One HE provider commented that HE delivered in FECs should be subject to the same forms of quality assessment as that in HEIs, and that this approach would protect the HE brand by ensuring consistent practice with the rest of the UK.

'HE in [further education] should be subject to the same approach to quality assessment using the same metrics. This would provide assurance to all stakeholders and provide protection of the HE brand by ensuring comparability both within [Northern Ireland] and with HE in [further education] provided in the rest of the UK'. (Publicly funded HEI)

220.   There was, however, a suggestion that the diversity of students' experiences in different types of HE provider should be recognised, and that providers and provision funded through different routes should be treated consistently.

221.   FECs agreed that feedback from learners should form part of the review process, and recommended that these learners should be able to take part in the NSS. They noted that this would require careful implementation, to ensure that the survey was promoted effectively so that learner views could be accurately captured.

222.   Practical concerns were raised about the costs of implementing this proposal.

Question 11: Do you agree with the proposal that more emphasis should be placed on the role of a provider's governing body to provide assurances about the quality of the student academic experience and student outcomes in line with the HE Code of Governance? If you agree, please indicate what, if any, additional support they should receive to provide such assurances.

Figure 33: Responses to Question 11[46][47]

Legend:
- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not applicable

* Legend items listed top to bottom correspond to pie chart sections organised clockwise from top
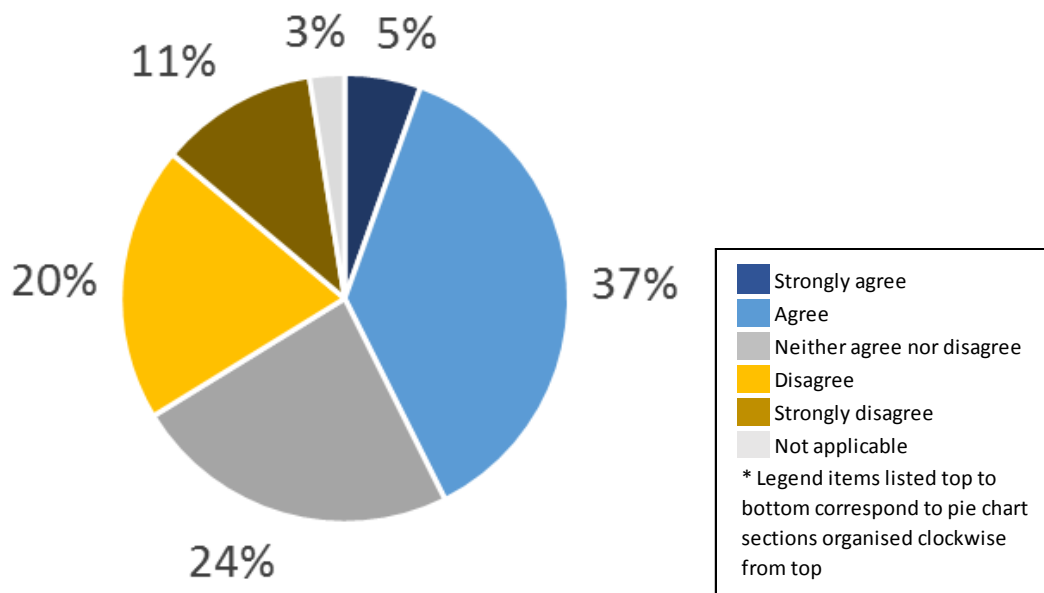
Figure 34: Breakdown of responses to Question 11[48][49]

HEIs - 117 respondents

FECs - 22 respondents
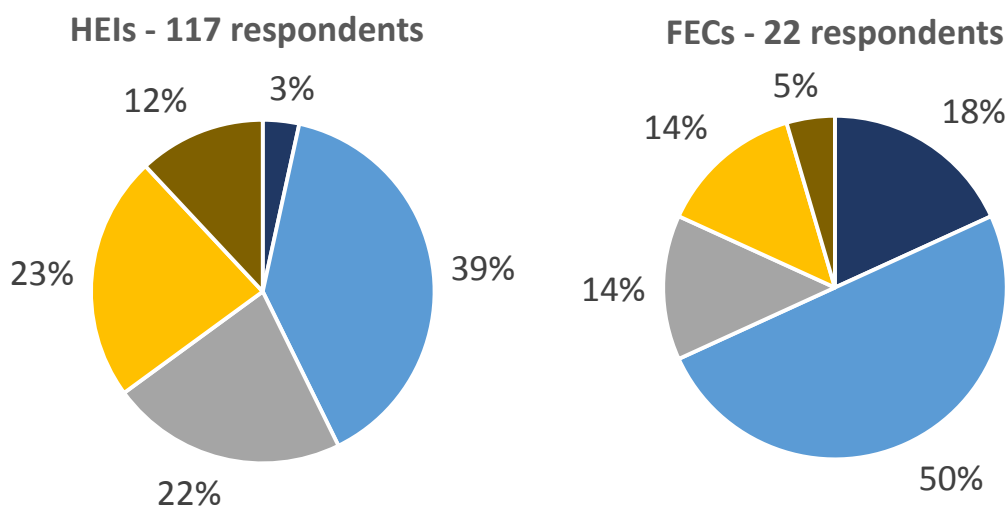
223. More respondents agreed than disagreed with this, but the gap between 'agree' and 'disagree' was smaller here than for many other questions, and a significant number of respondents neither agreed nor disagreed. In their comments, these respondents

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[46] 238 respondents answered the Likert-scale component of this question.
[47] This figure reproduces Figure 18 in Part A.
[48] Breakdown of the 139 publicly-funded providers who answered the Likert-scale component of this question.
[49] This figure reproduces Figure 19 in Part A.

tended to identify further issues for consideration and clarification before they would feel able to fully support the proposals.

224. There was broad support for making use of the relevant section of the HE Code of Governance (and other Codes of Governance that providers use), and more than a third of HEIs explicitly said that they saw a way in which the proposal could work in concert rather than in conflict with existing academic governance structures. Some institutions noted that they already operated similar governance arrangements to those proposed.

> 'As our governing body is already responsible for the academic character of an institution, it is appropriate that it should also be the primary agency with responsibility for assuring academic quality within its own institution.' (Publicly funded HEI)

225. FECs demonstrated greater levels of agreement than HEIs, which in turn were more positive than student organisations and some sector bodies (see Figure 34).

> 'Governance needs to concentrate [on] and [be] held accountable for the quality of teaching and learning and student outcomes far more than buildings and other matters'. (Publicly funded FEC)

226. Views commonly expressed (over 100 comments), whether by those in agreement or disagreement, were:

> a.   The need to properly recognise the role and responsibilities of senates and academic boards in academic governance, and the potential for tension should a governing body become too closely involved in quality management activities.

> b.   Concerns about the capability and capacity of governing bodies in this area, including a need for training and support, and potentially a review of the skills mix of members. A distinction was made between the experience necessary to make judgements about financial risk and those associated with academic quality, a related concern being that the building up capacity to address academic quality judgement might result in diminished capacity in other areas.

227. Among those respondents that neither agreed nor disagreed with the proposal, the main consideration was the second of these two issues, with 22 comments amounting to almost three times as many mentions as any other issue. By contrast, there were only eight specific comments about the role and responsibilities of senates and academic boards in academic governance, and the same number addressed the potential cost implications for providers. There was less evidence that these respondents were explicitly concerned with issues concerning training burden or institutional autonomy.

228. Respondents agreeing with the proposal often did so on the basis that the appropriate role for the governing body was verifying that institutional processes were in place to ensure robust institutional arrangements.

> 'We are confident in the ability of our governing body to undertake this role and in the ability of our internal quality assurance system to deliver the necessary evidence to enable this oversight to be meaningfully undertaken by our Senate and Council.' (Publicly funded HEI)

'We agree that institutions should be responsible for their own standards of quality and provide assurances to funding councils via reporting from governing councils.' (Sector representative body)

229. In contrast, respondents who disagreed with the proposal feared that a consequence would be a 'blurring of the lines' in governance and managerial roles (13 comments), and that governing bodies would be drawn inappropriately into making academic judgements because of the requirement to provide assurances about student outcomes (nine comments).

'The Code of Governance makes it clear that governing bodies should not become involved in matters of academic judgement and consideration of student outcomes is not currently set out within current HE governance arrangements.' (Publicly funded HEI)

230. Some 23 respondents expressed matters of principle about a perceived conflict of interests between governors' responsibilities for financial sustainability and institutional reputation, and a new quality assessment role. Although this point was seen as applying to all institutions, particular concerns were expressed about smaller providers being less able to avoid such conflicts (seven comments).

231. Respondents (17 comments altogether) also requested clarity on one or both of the following:

- how the proposal would apply where there were complex arrangements such as an institution working in partnership with others

- how it would apply to providers with different corporate forms that might not conform to traditional higher education governance models.

232. Over 50 commentators were concerned about how to ensure that cost and bureaucratic burden to institutions and to individual members of the governing body could be minimised.

233. The potential role of external consultants to assist governing bodies in discharging these responsibilities generated 25 comments. Such comments tended to reflect concerns about new costs being placed on institutions, and the 'spawning of a new HE industry'.

'We are concerned about the suggestion that external consultants could be engaged to help them achieve this as this could add an extra layer of burden and cost to institutions, and could privilege some institutions ' (Publicly funded HEI).

234. Student representative organisations (30) held mixed views: a third agreed with the proposal, a third took a neutral position, and a third disagreed. Those agreeing with the proposal saw advantages in the governors becoming more explicitly involved in discussion of academic quality. The most common concerns expressed by student organisations were:

a. That existing concerns about a relative lack of power for student members of governing bodies might be exacerbated by the proposals (11 comments).

'Any potential internal auditing process cannot come at the expense of student partnership, and thus a system must be designed with student participation in mind, actively addressing potential disparities of power between senior university management, governing bodies and students. It also must be designed to ensure the student voice is protected, upheld and influential within internal quality process.' (Student organisation)

b.   That a governing body might experience a conflict of interest in holding responsibility for financial and academic assurance, making it more difficult for the student voice to be heard (nine comments).

 'Any internal quality systems must recognise the power disparities between students and university senior management, and the potential conflict of interest for a governing body to both autonomously oversee quality whilst simultaneously holding responsibility for the reputation of the institution.' (Student organisation)

235.   Students appeared much less concerned than providers about issues of cost, burden and recruitment.

Question 12: For England, do you agree that, for English institutions, HEFCE should develop and use the existing external accountability mechanisms, particularly the HEFCE Assurance Review, in the ways described above?

Figure 35: Responses to Question 12[50][51]
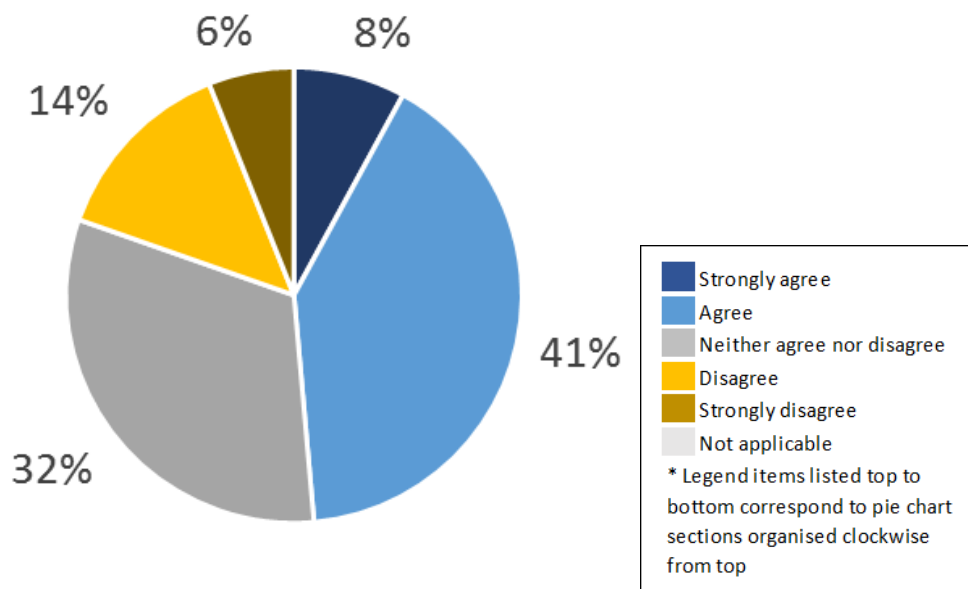
236.   A much greater proportion of respondents agreed than disagreed with this proposal, although a large proportion neither agreed nor disagreed. Sixty-eight

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respondents who answered this question did not provide any supporting comments, and such comments as were provided were often short and addressed only one or two relevant issues.

237. There was a noticeable split between the views of different groups of HEIs. Two-thirds of Russell Group members agreed or strongly agreed with the proposal, compared with just under two-thirds of University Alliance members, under half of Million+ members and under a quarter of GuildHE members.

238. Respondents in explicit support of the proposals (35 with no supporting comments) agreed that it would be sensible to adapt existing mechanisms instead of developing new regulation tools. In this group, support was also expressed for the convergence of regulation methods and developing a less burdensome process than the current HE Assurance Review. These issues were the most frequently reported in comments on this question (over 40 times across a range of stakeholders).

> 'It appears logical to utilise the existing annual accountability return to collect the quality assessment assurances and the five-yearly HAR light-touch visit to check the evidence and processes used in reaching these annual assurances.' (Publicly funded HEI)

239. One of the most frequently cited comments from all respondents (32 in total) was that the HEFCE Assurance Review (HAR) should be 'light-touch' and, although adaptation would be required, any increased burden should be minimised so that the new process did not recreate the burden of the current HE Review process. Most of these (23 explicit comments), from both those agreeing and disagreeing, argued that the HAR would need significant adaptation, and noted the importance of pilot activity for this element of the proposals. It was suggested that piloting should ensure that the evidence provided to HEFCE through the annual accountability return and the five-yearly HAR was robust and fit for purpose.

> 'We are concerned that the HAR itself should not become a review of institutional processes.' (Publicly funded HEI)

240. Of the 68 respondents who neither agreed nor disagreed, 12 provided no explanatory comments. Many (FECs and student organisations in particular) found it difficult to comment in detail because they said that they had no direct experience of the funding bodies' accountability mechanisms. However there was still clear support for a lighter-touch approach that drew on existing funding body accountability processes, and which aligned with the broader regulatory requirements for different types of providers (nine comments), with the proviso that clarity should be provided on how this might work in practice.

> 'What are the implications for institutions bound by other external accountability mechanisms, e.g. those developed by churches for ministry training?' (Publicly funded HEI)

241. One comment from those who neither agreed nor disagreed (nine mentions) was that without more detailed information on how the HAR would be adapted and made suitable they were unable to comment on the appropriateness of the proposal. Similarly, six comments called for clarity on how students and students' unions would be involved

in any revised approach, although there was an openness to how this might work in practice.

> 'Students are not familiar with this process and they are not currently involved, so therefore cannot judge its appropriateness for judging quality. What is important for [the National Union of Students] and unions is the level of external oversight for a HEI, the union's ability to engage in that process, and that institutions take feedback and comments from this process seriously.' (Student organisation)

242. Six comments also requested clarity on how the proposed reporting process might work for FECs, and five comments asked how the revised HAR would differ from the HE Review. There was also a limited concern (five mentions) about the capability and capacity of the funding bodies to undertake an enhanced HAR.

243. Some (eight comments) assumed that the HAR would be a direct and equivalent replacement of the current HE Review, expected it to fulfil the same purposes and therefore saw a number of shortfalls in its ability to do so.

244. A range of respondents in this category asked for the proposals to incorporate:

- an element of independent, external expert peer review (three mentions)

- students and student representatives in a meaningful way (four mentions)

  > 'This could involve students in the (HAR) review process, appointing students to act as reviewers, and providing scope for students to make their own submission as part of the HAR.' (Student organisation)

- a mechanism to ensure that institutions act on feedback (one mention).

245. A common response from the smaller number who disagreed with Question 12 commented that they could not agree with this proposal because they did not agree with the governance proposal (Question 11), or could only agree if changes were made to the governance proposal (16 comments address broader proposals around governance). Again, some respondents (six comments) felt that funding body staff did not have the expertise to take on this role and others (six comments) felt that a financial assessment process could not be adapted to assess academic outputs or the student academic experience. Similarly there were concerns about the robustness of any new approach.

> 'The replacement of external independent peer review with a system that includes a HEFCE Assurance Review means the loss of peer review including student involvement in this aspect of the process. We are not convinced that proposals for verifying institution's own assurance within a general assurance framework will be sufficient for this purpose unless significantly different engagement with institutions is envisaged. How will this kind of verification realistically get at whether the institution has failed to spot systemic issues or bad decisions that have yet to have an impact on metrics?' (Publicly funded HEI)

246. Most of the FEC respondents agreed with question 12, although many of them were also concerned that the proposals would result in a new reporting burden for FECs, or felt it was unclear how the proposal would affect FECs. One solution put forward by a couple of respondents was that the existing reporting and accountability mechanisms for FECs should be used.

247. Nine respondents identified concerns about the conflation of the roles of 'funding body' and 'quality body'.

Question 13: For Northern Ireland, do you agree that DELNI should develop and use the existing accountability mechanisms in the ways described?

248. The respondents who chose to answer this question were predominantly providers based in Northern Ireland and other organisations operating on a UK-wide basis. The number of responses is therefore very small.

249. There were mixed opinions on the proposals, with some concern about the need for the proposals to reduce rather than increase the burden on providers and other observations about the desirability of consistency with the approach in England and Wales.

250. Some of the organisations operating on a UK-wide based queried whether 'light-touch' mechanisms would be sufficient to test the reliability of a governing body's assurances. They suggested that consideration be given to using these mechanisms to mitigate the risk of unobserved deterioration, thus reducing the intensity and frequency of full external quality reviews of providers with a good record, rather than replacing them.

Question 14: Do you agree that there should be a 'probationary period' for new entrants to the publicly funded sector in England?

Figure 36: Responses to Question 14[52][53]
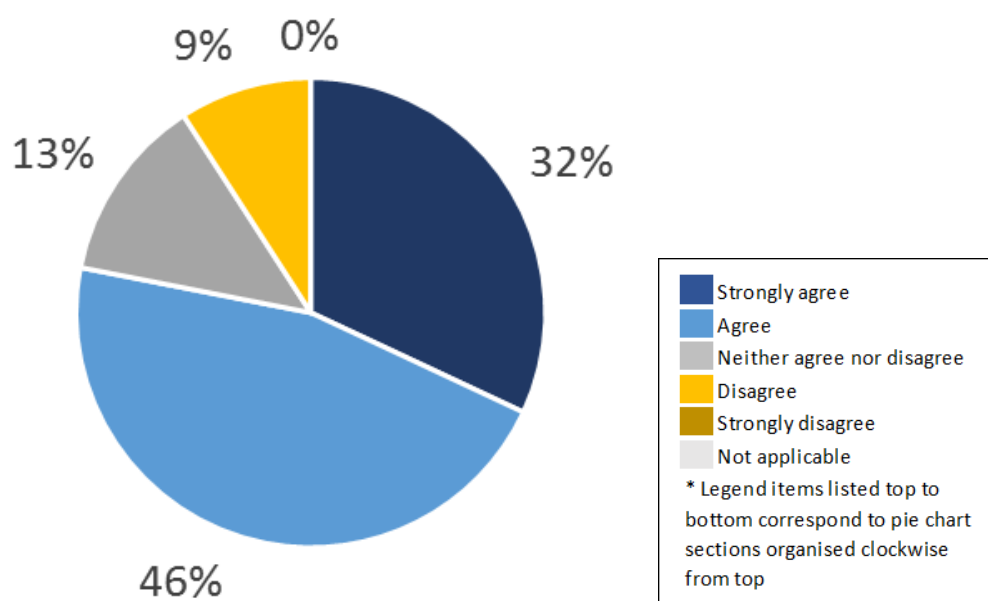
251. A very large majority of respondents agreed with the proposals for a 'probationary period' for new entrants to the publicly funded sector, but many had additional comments, or required further detail about the implementation of this proposal.

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[52] 238 respondents answered the Likert-scale component of this question.
[53] This figure reproduces Figure 8 in Part A.

'Yes, we believe that, in the interests of students, and the reputation of the sector as a whole, a probationary period is essential for all new providers of higher education in England.' (Publicly funded HEI)

252.   A total of 79 respondents chose not to provide any supporting comments. Those who neither agreed nor disagreed often (seven comments) sought more clarification on practical issues, on order to make an informed decision.

253.   Of those who agreed, 57 supported the proposals as they stood, and a further 37 in a revised form. Others looked for specific details or required clarification.

254.   Among those respondents in agreement with the proposal there was an emphasis (five comments) on protecting the collective student interest, which was considered to be particularly important in circumstances where an institution did not meet probationary requirements. There were also some who suggested that probation might be a useful approach when additional monitoring was considered necessary following a material change in an established provider (six comments).

255.   There was support, among those agreeing and disagreeing with the proposal, for a mechanism to ensure additional support for new entrants, regardless of whether a formal probationary approach was adopted (12 comments).

256.   Respondents, both those agreeing and disagreeing, raised concerns about potential negative connotations of a process referred to as a 'probationary period'.

'As with anything new, there must be a higher level of monitoring to ensure that the required standard is met and maintained in the short term. We are not sure that it should be called a "probationary period" which suggests there is a problem when in fact the institution could well be functioning at a level well above the basic standards.' (PSRB)

257.   Respondents who agreed with the proposal recommended that the practical operation of a probation period should be flexible, to accommodate different types of new entrants and the level of assurance they were able to provide (five comments). Linked to this, respondents who both agreed and disagreed with the proposals queried the use of certain terminology applied to providers in the consultation document, in particular 'mature', 'established' and 'new entrants' and (five comments) how this related to experience in delivering HE (regardless of funding).

'There should also be greater consideration to how the "maturity" of an institution is identified – for example there are many institutions that, whilst they have been in existence – and delivering high quality education – for many years have only recently decided to enter the regulatory and funding system. This should be taken into consideration rather than just how recently they have gone through a regulatory gateway.' (Publicly funded HEI)

258.   Further information was requested on the following elements of the proposal, mainly by those in support:

- some respondents suggested that the length of any probationary period should be specific to the circumstances of an individual provider, with a number suggesting that this should be based on the length of time it takes for

a cohort to graduate (average three years) and others suggesting five or more years (16 comments)

- the importance of collecting data as part of probationary period because new entrants may not have as much 'historical data' as publicly funded institutions (two comments)

- how any 'quality kite mark' would be awarded (one comment)

- how the burden for new entrants would be balanced against the need for a robust but usable system (two comments).

259. No respondent strongly disagreed with the proposals. Where there was disagreement this largely stemmed from a view that a probationary period was unnecessary for the following reasons:

- the gateway process should provide sufficient assurance that an institution had met quality requirements, rendering probation unwarranted (three comments)

- the use of risk-based monitoring and a recognisable 'quality kite mark' made a probationary period superfluous (six comments)

- a probationary period could discriminate against new entrants, if new entrants were subject to different processes and levels of scrutiny from established providers (three comments).

260. These concerns tended to reflect a preference for a relatively high barrier for entry to the system.

'If the threshold for entry to the publicly funded sector is set at a sufficiently high level; that there is a higher level of scrutiny in the first years of operation; and the triggers for concern are set at an appropriate level of sensitivity, it is not clear why a probationary period should be required.' (Publicly funded HEI)

Question 15: Do you agree that international activities should be included in the remit of future quality assessment arrangements as described?

Figure 37: Responses to Question 15[54][55]
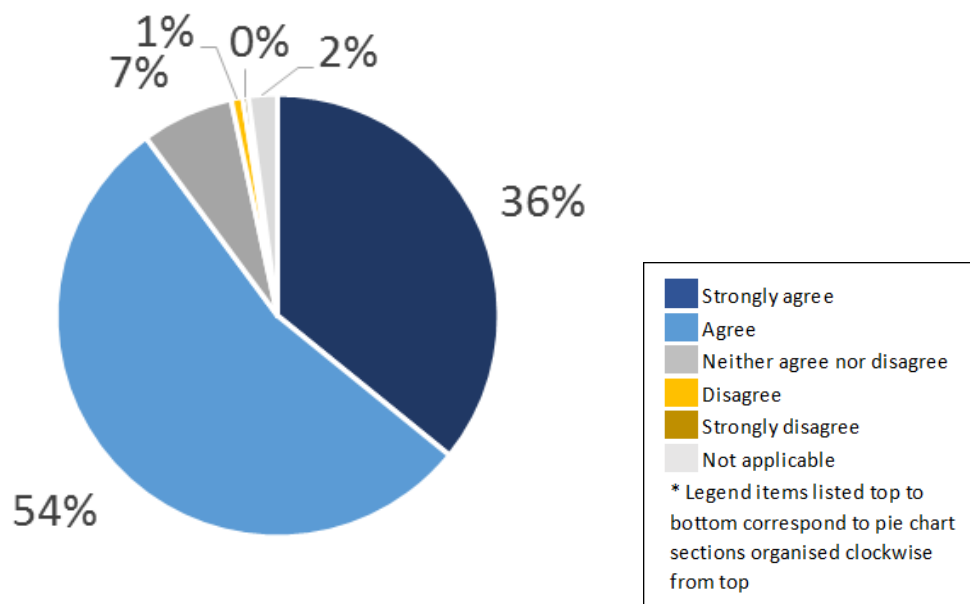
261.   Approximately nine out of 10 respondents agreed with this proposal. Although 85 chose not to provide any supporting commentary, a wide range of additional comments were made by those who did. There was no clear pattern across the different categories of respondents.

262.   The most frequent comment (mentioned 68 times) confirmed the importance of ensuring that UK standards should apply wherever the provision is delivered. It was also noted that that preserving the UK's global reputation in higher education should be a central pillar of any new system (33 comments).

> 'not including HEIs' international activities in future quality assessment arrangements could put this at risk and create a two-tier system.' (Sector representative body)

263.   Some respondents discussed the benefits of having a system that enabled comparisons between delivery sites in the UK and internationally (six comments). Others noted the principle that UK institutions have a responsibility for students registered on their programmes regardless of where they study (14 comments).

264.   Four respondents specifically noted that students in partner institutions should be able to participate in quality assessment arrangements.

> 'The OIA receives complaints from students registered with English and Welsh universities but situated internationally, and these have (and should have) equal

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status with complaints from registered students based in England and Wales' (HE agency or organisation).

265. International activity was perceived by a number of respondents as fundamentally risky and complex in nature (21 comments). One respondent noted that:

'…international activities present different risks to institutions and to the UK's reputation and should be monitored. This is particularly important where UK qualifications are being awarded.' (Publicly funded HEI)

266. However, others disagreed:

'We do not agree that regulation of transnational arrangements has inhibited the development of genuinely high-quality projects; rather, responsible institutions see any burden associated with regulatory caution in this area as a necessary and worthwhile investment in a successful outcome.' (Publicly funded HEI).

267. Many respondents (12 comments) specifically commented on the need for the new system to account for the diversity of local regulation and processes, and to recognise that UK institutions involved in the delivery of provision outside the UK had to meet the requirements of a range of different systems and account for local context.

268. Respondents highlighted a range of factors that added to the complexity of international activities, including that:

a.   Metrics for international students would not necessarily be the same as for students studying in the UK and might require amendments (19 comments).

'HESA data may well be available in the future for overseas students, but other key data such as NSS and DLHE will not be' (Publicly funded HEI)

Others felt that the data could be collected at the same time as for UK-based students.

b.   The new system needs to be aware of the potential for new activity to be 'stifled' by changed processes (five comments):

'We note that the cost of assuring [transnational education] has proved a major stumbling-block in recent discussions' (Publicly funded HEI).

c.   Avoiding duplication of scrutiny carried by other bodies, such as local foreign QA authorities or PSRBs, would reduce potential burden (five comments).

269. Eleven respondents discussed the challenges that governing bodies would face in providing assurances about international provision.

270. Nine respondents commented especially favourably on the current reviews of international provision, and reflected whether a similar process could continue which included peer review and helped highlight issues that were common across the sector.

Question 16: Do you agree that a future quality assessment system must provide reliable assurances to students and other stakeholders about the maintenance of academic output standards and their reasonable comparability across the UK HE system?

Figure 38: Responses to Question 16[56][57]
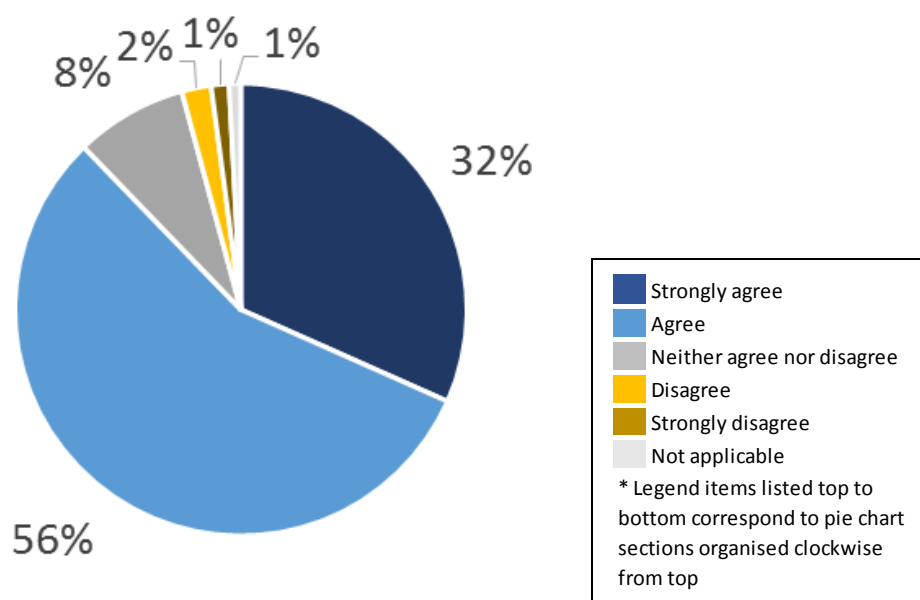
271.   An overwhelming majority of respondents, 88 per cent, were in agreement with this proposal. Many of these expressed unreserved support, suggesting it was 'a core principle of UK HE', and that it was 'vital to any quality system to ensure comparability across the sector'.

> 'We believe that the priority for the quality assessment system should be accountability of academic standards and annual reporting should reflect this.' (Sector representative body)

272.   A number of submissions (17) stressed that it was essential to safeguard the international reputation of UK HE:

> '…any reputable system must provide reliable assurance of academic output standards… this underpins the UK HE excellent reputation and we cannot afford to risk this.' (Publicly funded HEI)

273.   Others, responding positively to this question, emphasised that it was necessary because of the student interest. Indeed, almost all student organisations responding to this question expressed support.

274.   A small number of respondents (14) qualified their support, stressing that pursuit of reasonable comparability must not compromise the autonomy of HEIs.

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[56] 238 respondents answered the Likert-scale component of this question.
[57] This figure reproduces Figure 4 in Part A.

'…we would have concerns about the practical implications of any system being able to provide the kind of reassurances that the consultation document implies without having significant implications for institutional autonomy.' (Sector representative body)

275.   Of the very small number of respondents disagreeing with the proposal, three also cited this concern. With this in mind, the statement in the consultation that the funding bodies are 'not advocating a shift away from the autonomy of degree-awarding bodies to set and maintain standards' was welcomed.

276.   The importance of recognising the diversity of the sector featured strongly in responses. Some respondents (eight comments) emphasised that the diversity of the sector made pursuing comparability of standards essential to give meaning to HE provision among students, stakeholders and the public.

'Yes, with the increasing diversity of the HE sector the assurance of comparability of standards is imperative.' (Publicly funded higher education institution)

277.   Others (24 in total) stressed that that the different missions and types of HEIs in the sector would make this 'reasonable comparability' difficult to achieve:

'While the principle of "reasonable comparability", broadly conceived, is sound, it will be extremely challenging to develop a system which respects the necessary and valuable plurality of the sector while providing readily understood assurances to the public about the comparability of standards across diverse institutions and subjects.' (Publicly funded higher education institution)

278.   Some submissions, however, appreciated the Funding Councils' raising this difficult issue.

279.   Some respondents (11, both agreeing and disagreeing with the proposals) stressed that diversity of provision across the sector would mean comparability of standards would only be possible at the level of threshold standards.

280.   Twenty-six comments were made in support of elements of the existing quality assurance infrastructure, such as the Frameworks for Higher Education Qualifications and subject benchmark statements, with a call for new arrangements to build on these rather than starting from scratch.

281.   A comment in support of the proposal suggested that the HEA's Professional Standards Framework might be better used to strengthen the reliability of assessment and consistency of external examining practice.

282.   Several respondents asked for further detail of how reasonable comparability might be achieved (22 comments). A small number called for information about which organisations would manage or implement any new arrangements. One sector body in particular, in expressing support for the maintenance of 'consistent and comparable standards of quality across the UK sector', called for the establishment of:

'A single independent UK-wide quality body [which] will enable comparability of standards through shared sector ownership of the baselines of academic quality throughout the UK.' (Sector representative body)

283. A similar number of comments (seven) were made by respondents, who agreed with the proposals, but expressed fears about the additional burden or costs of providing reliable assurances. The comment was also made that this work should not divert resources from delivery of teaching.

284. Further detail was requested in some areas:

- What was meant by 'reasonable comparability' (20 comments from those expressing support) and how it might be achieved, with a call for more sector-wide discussion on this.

- What was meant by 'academic output standards' (from those opposed to the proposals).

- How the proposals would take into account HEFCE-funded provision from awarding bodies offering Higher National provision, such as Pearson Edexcel (three comments).

- Whether the proposals might reduce the current welcome degree of autonomy and diversity among non-validating institutions.

285. The eight respondents who disagreed did so on the basis that comparability in the form proposed was neither possible nor needed, and would lead to undesirable consequences. They raised the following points:

- Different factors are important to students and stakeholders in making comparisons, and standards alone comprised only one indicator of quality. Other aspects of quality might make comparability difficult to achieve.

- The existing external examiner system was able to safeguard standards sufficiently.

286. Four respondents who disagreed with the proposal called for the development of a better narrative confirming the comparability of standards across the sector. Seven respondents of all types expressed particular concern that 'reasonable comparability' could lead to calls for a national curriculum or homogenisation of the sector.

Question 17: Do you agree that the external examining system should be strengthened in the ways proposed, i.e. through additional training and the establishment of a register?

Figure 39: Responses to Question 17[58][59]
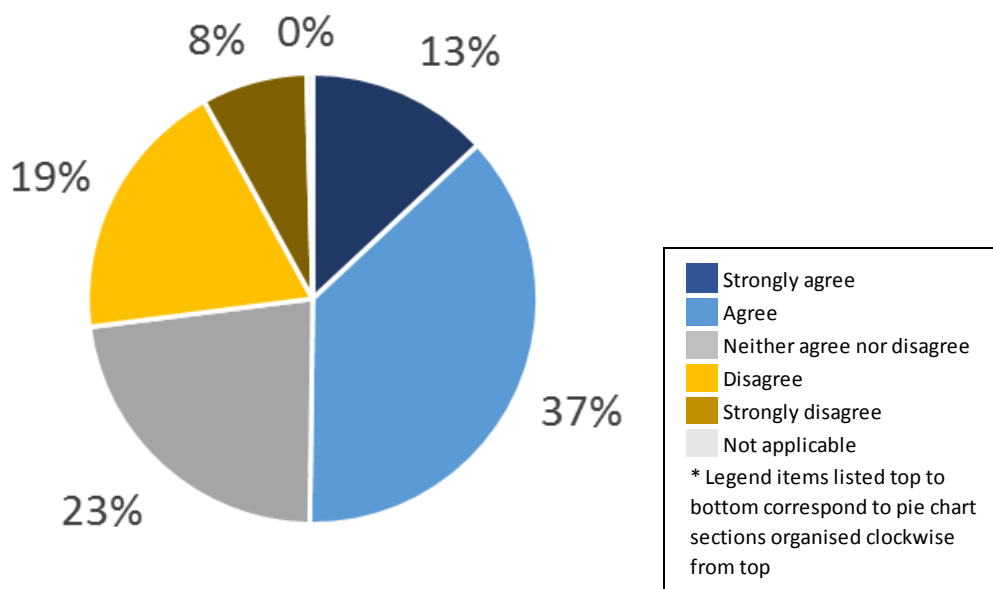
287. More respondents agreed with the proposals than disagreed, but the numbers were more closely balanced for this question, and a large number neither agreed nor disagreed. Of the 40 responses which lacked accompanying comments, 30 agreed or strongly agreed with the proposals.

288. Concerns from those who neither agreed nor disagreed were generally of a practical nature, rather than on points of principle.

289. Similar comments were made in agreement and disagreement, and the analysis of detailed comments reveals support for the proposals on external examining, but with some qualifications.

> 'We are broadly in agreement with these proposals. There are many practical matters to be considered in how this could be implemented, but if the sector is to take seriously the maintenance of academic output standards and their broad comparability, then this needs to be based on a stronger, more reliable external examining system.' (Publicly funded HEI)

290. Respondents made 82 comments offering a specific reason for supporting the register, training or both. A further 10 commentaries discussed the need to professionalise the role further and reiterated the need to improve the reasonable comparability of degree standards (four comments) – although 11 comments questioned whether this was possible with the proposals on offer.
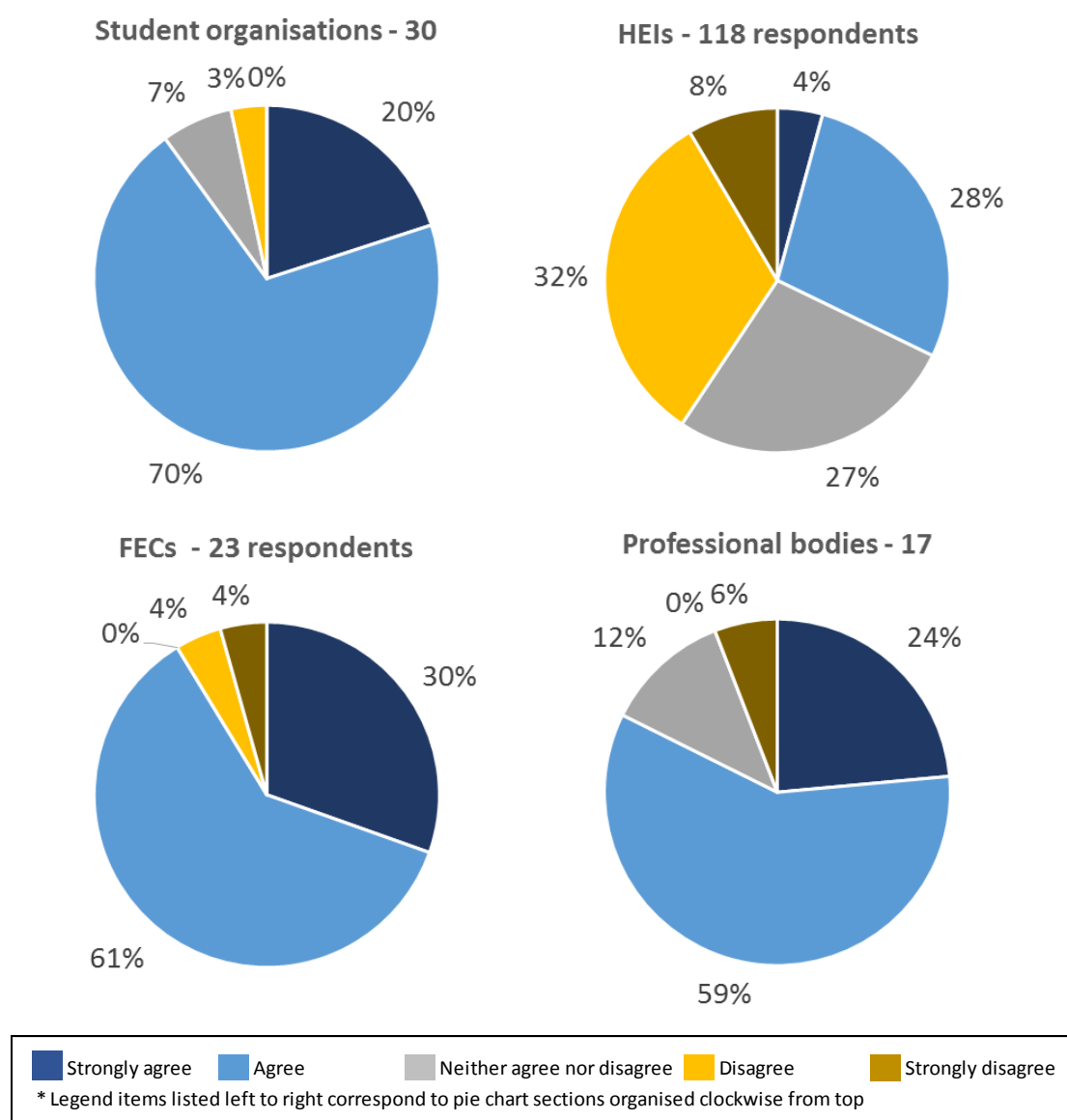
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[58] 238 respondents answered the Likert-scale component of this question.
[59] This figure reproduces Figure 14 in Part A.

291. There was widespread recognition that the external examining system was owned by the sector as a whole, and a strong desire for further consultation on these aspects of the proposals. It was argued that further development of this system should be led by sector representative bodies rather than the funding bodies (four comments).

292. Respondents – whether agreeing or disagreeing with the proposal – were in agreement that providers should continue to support the external examining system by supporting their staff to become external examiners, in particular providing dedicated time and opportunity to do this (24 explicit comments). Some respondents suggested that this would alleviate concerns about remuneration of examiners, but others were concerned that the proposals might prove a disincentive.

Figure 40: Breakdown of responses to Question 17[60][61]

Student organisations - 30
20%, 70%, 7%, 3%, 0%

HEIs - 118 respondents
4%, 28%, 27%, 32%, 8%

FECs - 23 respondents
30%, 61%, 0%, 4%, 4%

Professional bodies - 17
24%, 59%, 12%, 0%, 6%

Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree
* Legend items listed left to right correspond to pie chart sections organised clockwise from top

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[60] Breakdown of the 237 respondents who answered the Likert-scale component of this question, by type of organisation. Shows 188 respondents who represented the four types of organisation considered.
[61] This figure reproduces Figure 14 in Part A.

293. FECs, student organisations and PSRBs were significantly more supportive of the proposals than HEIs (see Figure 40).

> 'Increased transparency with external examining can only be a good thing. Currently, external examining is seen as a "dark art", with students unable to engage in any form of accountability process, nor empowered to challenge or question decisions.' (Student organisation)

> 'The college agrees that the external examining system would hugely benefit from sector wide training and induction' (Publicly funded FEC)

294. Student bodies favoured a move towards increased transparency and accountability, and some comments explicitly encouraged a greater role for students in the system (three comments). The FECs, on the other hand, expressed many of the reservations of the HEIs, but these reservations were outweighed by the perceived benefits of the proposals. PSRBs were supportive and called for coordination with the structures already in the sector supporting external examining (for example some PSRBs already hold registers).

295. From HEIs there was more support for improved training of external examiners than for a register. A clearer explanation of the value of such training was requested from all types of respondent (13 comments in total), together with more information about the practical implementation of the proposal (two comments discussed refresher training and 14 sought clarity on the 'fit' with local training provided by institutions), but respondents from HEIs generally recognised the importance of training if the context in which it was delivered was appropriately recognised (11 comments). Some respondents noted that, although the current system carried an expectation that external examiners should be trained, there might be a lack of clarity in this area resulting in variability across the sector.

296. Those in support of training suggested developing a national training framework that could be either incorporated into institutions' own training of their external examiners or embedded into the training in the HEA UK Professional Standards Framework. The wider role of the HEA in facilitating communities of practice and delivering and managing training aspects was also mentioned by some respondents (11 comments).

297. Those disagreeing with this aspect of the proposal expressed concerns that:

- the proposals represented an additional burden for providers (29 comments)

- training was not a substitute for experience and expertise (two comments)

- the register or additional training in whatever form would act as a disincentive to academics, particularly experienced and senior academics, to continue in the role (41 comments).

298. Those respondents who were more positive about the proposal to develop a register of external examiners argued that it could support institutions in finding suitable ones. A small number of comments (two) also noted that a register might helpfully raise the profile of external examining and attract new academics. Alternative providers (two comments) identified a need to enable all educational providers to access the register.

299. A minority of respondents highlighted potentially useful functions for a register:

a.　To create a register for senior external examiners only, which would evidence experience and expertise. These examiners would mentor the other external examiners supporting their institution, who would therefore not be included on the register.

b.　To capture reciprocal arrangements and the number of appointments external examiners hold, thereby providing evidence of compliance with the existing requirements.

300. Conversely, a number of respondents (from across the spectrum of agreement) felt that the proposed register would:

a.　Add additional burden, deterring academics and practitioners from engaging with the external examiner role (24 comments).

'Any system of registration, and training, must avoid unnecessary bureaucracy and any other barriers, particularly on workload, that would provide disincentives for those currently operating as examiners to continue.' (PSRB)

b.　Increase current challenges in sourcing academics or practitioners with the appropriate expertise in niche and specialist provision (22 comments).

'This needs to take into account the difficulties faced by specialist subjects in finding external examiners.' (Publicly funded FEC)

c.　Place a limit on the independence and autonomy of institutions (13 comments). This point was amplified through some respondents' erroneous assumption that the appointment of external examiners could become a centralised process which was not intended by the proposals.

'Given institutional autonomy and responsibility for quality and standards, any centralised training of external examiners will have to be complemented by locally provided training and induction.' (Publicly funded HEI)

301. Providers were particularly concerned about the administrative burden and additional costs of strengthening the system. This accounted for approximately a fifth of all the comments on this question. Some comments revealed support for strengthening the external examining system, but not in the proposed ways – largely because of perceived uncertainty about the costs and administrative burden. Their suggestions included:

a.　A need to ensure the bureaucracy involved was limited, and that the mechanisms allowed academics to train and join the register in a timely fashion.

b.　The question of the costs involved and which stakeholders would be meeting these costs.

c.　Including a 'grandfather clause' should be operated in which all current external examiners would automatically be included on the register (one comment).

'This will be an additional cost to the sector, principally in terms of academic time/salaries and we would like to see more evidence that it would be cost-effective before imposing this cost. If there is evidence, there should be consideration of how the changes would be funded or compensated by deregulation elsewhere, rather than just be expected to be absorbed.' (Publicly funded HEI)

302. Among those respondents who neither agreed nor disagreed with the proposals, the overriding concern was the potential increase in costs and burden. This accounted for a quarter of all comments, and three times as many as any other issue. Clarification on the operational detail was also important.

303. Respondents (particularly but not exclusively those who disagreed with them) felt that the proposals did not include the level of detail necessary for the consultation responses to fully consider their effects. Further information was requested on how the training or register would achieve the desired outcome of demonstrating comparable standards across the sector (11 comments).

'We do not believe that it is possible to demonstrate comprehensively that standards are the same across the sector. External examiners are part of a suite of activities, largely qualitative but some quantitative, providing universities assurance of academic standards and helping improve educational provision. To elevate and isolate one component, such as the external examiner system, threatens to unbalance the integrated nature of academic standards assurance.' (Publicly funded HEI)

304. Comments from a minority of respondents asked under what circumstances external examiners would be removed from the register (seven comments).

305. Other comments concerned how the development of the system would align with the Higher National provision validated under Pearson Edexcel, with a very limited number of further education colleges seeking closer alignment between the systems (two comments).

306. Many providers – whether agreeing or disagreeing – also highlighted the value of the less formal aspects of the external examining system, for example the 'critical friend' (six comments), and cautioned against losing these while seeking better assurances about standards.

Question 18: Do you agree that our proposals in relation to the external examining system are sufficient, i.e. do they go far enough to provide the necessary assurances about academic output standards to students and other stakeholders?

307. The quantitative analysis for this question has not been included, as it is clear from the respondents' comments that the question was interpreted in materially different ways, rendering the Likert scale responses unreliable.

308. Approximately 20 per cent of respondents did not leave a comment for this question. An additional 10 per cent referred to previous responses.

309. Overall there was a sense from respondents that the proposals were sufficient to strengthen the external examining system (27 comments). A further group of respondents felt that the direction of travel was appropriate, advocating other enhancements to be introduced as the system developed and evolved further (18 comments).

310. A dissenting view expressed explicitly in 33 comments, 29 of them from HEIs, was that the proposals went too far. Concerns centred on:

- the blurring of the line between the roles of critical friend and of standards assurance

- the greater reliance to be placed on the role of the external examining system.

311. In contrast, some student organisations argued that the proposals did not go far enough. There was a desire to continue to develop them further, stressing that it was important from a student interest perspective that the new structure provided better assurances.

312. One of the strongest messages was a desire for further consultation and discussion on developing and implementing the detailed proposal.

313. Many responses echoed themes already explored in Question 17, including:

- that external examining was one part of the future QA system (10 comments)

- the role of institutions in recognising and supporting their staff to become external examiners (eight comments)

- a desire for any changes to be phased into the system over time (three comments)

- a need to consult further with the sector and ensure that any changes to the external examining system were sector-led (five comments)

- the need for a clearer understanding of the costs and bureaucracy of the system and ultimately who would fund it (14 comments).

314. A small number of respondents requested further justification for this element of the proposal, specifically:

a. The evidence demonstrating the need to strengthen the current external examining system (one comment). (Some responses did not consider the HEA research and the arguments this made about academic standards and of the current external examining system.)

b. Whether the external examining system should instead be replaced entirely or removed. One rationale for this was that other higher education sectors internationally do not use an external examining system (three comments).

315. A range of stakeholders included comments suggesting that these proposals could be built on. These points were as follows:

a. **Piloting differing approaches to external examining.** A few respondents expressed a desire to evaluate any changes made to the external examining system and in particular to review the effectiveness of any new training.

b. **The UK Professional Standards Framework** managed by the HEA could provide an opportunity to incorporating the training requirements for external examiners into a broader set of expectations for professional practice (three comments).

c. **Continuing professional development** (CPD) would be needed in addition to the original training framework. Two respondents noted that this could link to a 'licence to practice' model where CPD would be a requirement for an external examiner to continue to practice. This CPD could involve working in communities of practice facilitated by the HEA (two comments).

d. **Practitioners and representatives from business** should be appointed as external examiners, to link to the increasing business and workplace focus of degrees (one comment).

e. **PSRBs' roles and activities** need to be considered to avoid duplication (two comments).

Question 19: Do you agree that it would be helpful to explore approaches to the calibration of academic output standards in different disciplinary and multi-disciplinary contexts?

Figure 41: Responses to Question 19[62][63]

Legend:
- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not applicable

* Legend items listed top to bottom correspond to pie chart sections organised clockwise from top

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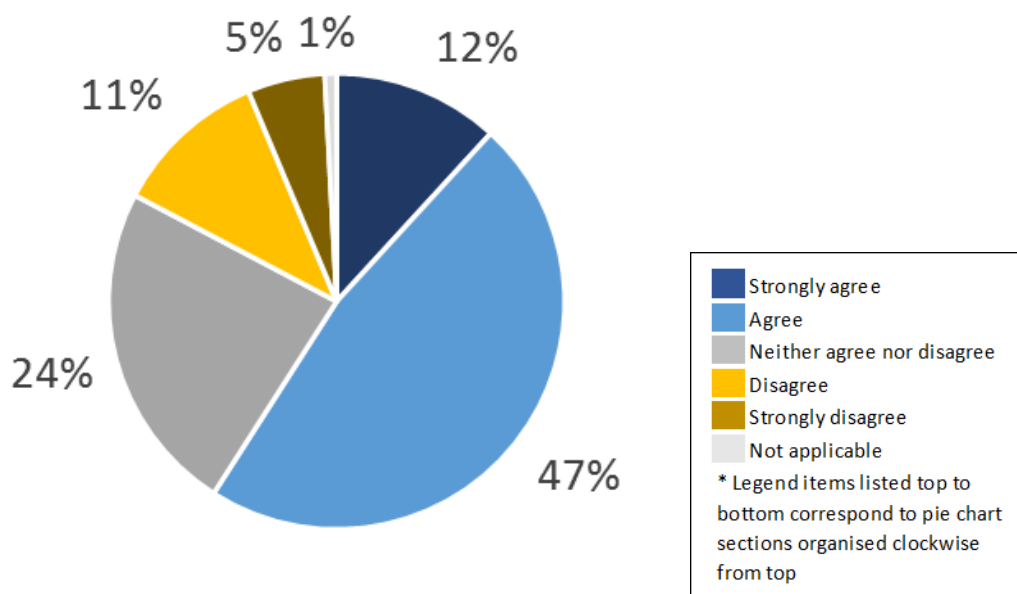
[62] 238 respondents answered the Likert-scale component of this question.
[63] This figure reproduces Figure 16 in Part A.

316.   The majority of respondents supported this proposal, though the emphasis was often on 'exploring' and the 108 respondents who made comments often qualified their agreement.

> 'The proposal to reflect further on academic standards calibration is welcome and the focus of discussion at the discipline level is the right one.' (Publicly funded HEI)

317.   Discussion of the challenges featured highly among respondents in favour of this proposal. For example, the potential for additional burden was cited by 13 respondents while 10 more commented on the difficulties presented by the diversity of providers. A further 15 commented that further investigation and discussion in this area would be helpful.

> 'This is an incredibly complex area and considerable time and effort must be devoted to exploring future changes that may be made.' (Student organisation)

318.   Other challenges identified by respondents in support of this proposal included:

- the difficulty of this exercise given differences across the HE sector, for example in terms of curriculum, programme design and assessment (20 comments)

- remembering institutional autonomy and sector diversity (five comments)

- Avoiding additional cost and burden, especially in terms of staff time (13 comments)

- enabling curriculum innovation (six comments)

- considering in particular specialist, niche areas of provision (five comments).

319.   Further comments in support of the proposal noted that it:

- offered increased transparency in academic outcomes (one comment)

- was needed because of the increasing competitive and changing nature of the HE landscape (one comment)

- would support and make the judgements of external examiners more robust (six comments):

  > 'External examiners working in isolation means there is very little opportunity to share good practice. Working together to agree some baselines of quality in subject areas, while retaining the uniqueness of each programme, is a worthy goal.' (Student organisation)

320.   In addition to strong support for this proposal from 21 student bodies, there was approval from across the sector including 67 HEIs, 18 FECs, 11 PSRBs, seven sector representative bodies and five alternative providers. Three FECs also expressed interest in being involved in pilot activity.

321.   Of the 57 respondents who neither agreed nor disagreed with this proposal, 13 made no comment as to their reasoning. Of the 43 respondents who made comments, 11

discussed the difficulty of implementing the proposal with such a diverse range of providers, while a further 10 discussed the potential for additional cost and burden.

> 'Yes, it would be helpful to explore different approaches. But any exploration should be mindful of the resource implications of different approaches and balance this with the ability to provide the assurances that the stakeholders require.' (Publicly funded HEI)

322. Five respondents commented on the difficulty of achieving this proposal given the diversity of subjects and providers.

> 'Possibly agreement within a mission group may be achievable, although we have concerns about the application across the sector between institutions with different missions.' (Publicly funded HEI)

323. Other reasons for responding neutrally included:

- a concern that the proposal might stifle innovation (four comments)

- the potential threat to institutional autonomy (three comments)

- a fear of creating a national curriculum (four comments).

324. Opposition to the proposals (39 respondents) focussed around a number of core issues.

a. **Autonomy:** nine respondents indicated that they believed the proposals were not compatible with institutional autonomy.

b. **Diversity:** eight respondents felt that the diversity of the sector meant the proposal would be very difficult to achieve and add little value.

> 'Consensus will take years and achieve little for those not involved.' (Publicly funded HEI)

c. **Challenges:** Nine respondents commented that the calibration would be a futile exercise as standards comprise a number of differing factors, which cannot be aligned into a single set of standard outcomes.

> 'Too difficult and would not be meaningful or useful. How do you compare fine arts with maths?' (Publicly funded HEI)

d. **Cost and bureaucracy:** Four responses believed that cost and bureaucracy would be disproportional to the possible results.

e. **Lack of need:** seven responses stated that the proposal was disproportionate or that current arrangements already worked well, for example in terms of use of the Frameworks for Higher Education Qualifications and subject benchmark statements, and through operation of the existing external examining system.

> 'Mandatory cross-sector assessment parity exercises do not seem to be a proportionate approach to the quality assurance of degree outputs.' (Publicly funded HEI)

Question 20: Do you agree that providers should use the accreditation activities of at least some PSRBs more centrally in future approaches to quality assessment?

Figure 42: Responses to Question 20[64][65]
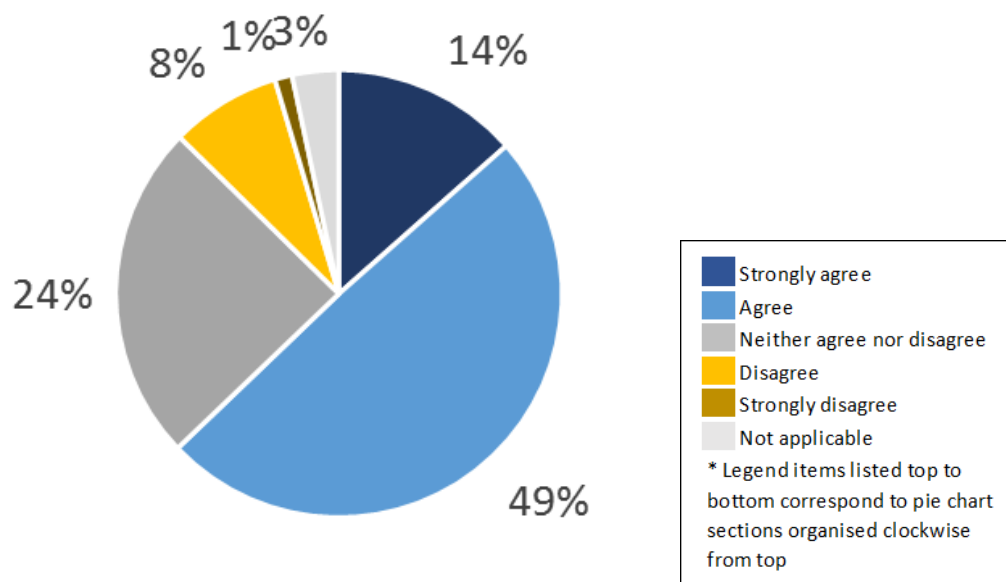
325.   The majority of respondents agreed or strongly agreed with these proposals. A quarter neither agreed nor disagreed. No comment was submitted by 57 respondents, 35 of whom agreed with the proposal. Often those who agreed with the proposals also made suggestions about what meaningful involvement should involve.

> 'We suggest that HEFCE considers recognising the work of PSRBs based on a core set of principles, which could include: outcomes-based accreditation; public reporting of accreditation outcomes; public appointment of accreditors; lay representation on accreditation panels; student/recent registrant representation on accreditation panels; full disclosure of conflicts of interest; adherence to a code of conduct for accreditors, and an independent appeals process for accreditation decisions. We think that adopting principles along these lines would give HEFCE an appropriate degree of confidence in the work of PSRBs.' (PSRB).

326.   The majority of responses from PSRBs either strongly agreed or agreed with the proposals, with only two registering a neutral response. FECs, sector bodies and higher education agencies or organisations had a similarly positive response. Student organisations' responses were equally split between agreement and neutrality, with only one such respondent disagreeing with the proposal. The majority of HEIs agreed with the proposal, the remainder being equally spilt between neutrality and disagreement.

327.   Respondents strongly conveyed that PSRBs should be one element of the future approaches to QA, rather than the sole means by which a subject or discipline was assessed for quality (43 comments). Respondents were equally likely to raise this point

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[64] 238 respondents answered the Likert-scale component of this question.
[65] This figure reproduces Figure 5 in Part A.

whether they agreed or disagreed with the proposal. Respondents who agreed and those who were neutral to the proposals were equally concerned that the work of a particular PSRB should be used only where it was appropriate and relevant (41 comments). Respondents commented 28 times that many providers already use the work of PSRBs in their internal quality processes, and that it would be a positive development if more central use reduced duplication and burden.

328.   PSRB responses focused on suggestions about how PSRBs could become more involved in the quality assessment system (nine comments). The suggestions centred on the need to respect the diversity of PSRBs (seven comments). It was also noted that PSRBs had a different purpose from academic quality assessment processes, in the sense that they focus largely on professional practice, skills and standards rather than on academic quality and standards:

> 'It should also be noted that at present PSRBs focus on professional requirements rather than academic standards so it is not clear how the activities of PSRBs could be used in a meaningful way to confirm that academic standards are secure.' (Sector representative body)

329.   The diversity of PSRBs was a strong concern, addressed in 66 comments, half of them neutral and half voicing concerns about the implications of such diversity. This diversity was considered likely to create complexity when making PSRB activities more central to a future quality assessment system (10 comments). For example, there was no universal PSRB subject coverage (17 comments) and the different PSRBs were not comparable (seven comments). PSRBs also differ in terms of their focus and approaches to quality assessment, which was seen as potentially undermining the reliability and comparability of the assurances they can provide:

> 'We recognise the valuable input of some PSRBs, but due to the heterogeneous nature of PSRBs, it would be inappropriate to place such bodies at the centre of future approaches to quality assurance.' (Publicly funded HEI)

330.   Despite the overall positive response a minority were concerned that a more integrated approach would require fundamental changes to the core business of PSRBs (four comments), although none of these respondents were PSRBs.

331.   Respondents who agreed with or were neutral to the proposal highlighted the importance of institutional autonomy in determining internal processes (11 comments):

> 'HEIs need to feel free to make their own judgement about retaining full use of their own review processes alongside those of the PSRB, even if this appears at first sight to represent a potential duplication of effort. In principle, however, we would agree that PSRB accreditation activities could provide governing bodies with "direct evidence of the appropriate management of standards and quality within a department or subject area".' (Publicly funded HEI)

332.   A smaller number of those respondents who agreed with or were neutral to the proposal emphasised the need for an appropriate balance between academic and professional requirements when considering the use of PSRBs in quality assessment processes (five comments).

333.   The potential for costs and burdens to change was mentioned by 21 respondents. A smaller number of respondents suggested that more support would be needed for PSRBs to implement a more central function, and that further consultation with the sector would be required (seven comments).

334.   Smaller numbers of respondents raised constraints that would need to be considered during detailed planning:

- the importance of student engagement and support, and the right within institutions to appeal against PSRB assessments (six comments from student unions)

- a lack of alignment between PSRBs and the HE sector as a whole (four comments)

- limited resources within PSRBs to audit large numbers of HE providers (three comments)

- a frequent reluctance among PSRB to work collaboratively with each other (three comments)

- the varying value of PSRB assessment at the broader institutional level (two comments)

- a concern about relying on findings of different QA processes from different bodies (two comments)

- the importance of capturing industry feedback in QA processes (three comments)

- a need for PSRBs to have quality assurance or to be accredited (two comments).

Question 21: Do you agree with the proposal that we should place more emphasis on the role of the governing body of a provider with degree awarding powers to provide assurances about security and reasonable comparability of the academic outputs of standards?

Figure 43: Responses to Question 21[66][67]
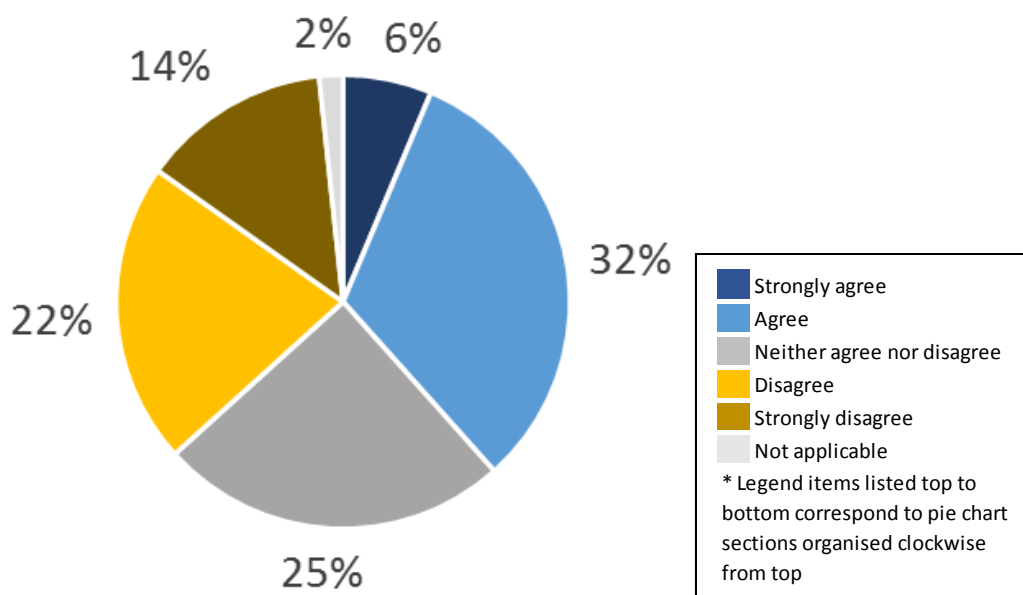
335. Responses here were finely balanced:

> 'Yes – as per our response to Question 11, an enhanced role for governing bodies would be appropriate in a system which values institutional autonomy and principles of co-regulation.' (Publicly funded HEI)

> '[Name redacted] welcomes the suggestion that the costly burden imposed on institutions should be reduced by a greater reliance on institutional systems and processes. All governing bodies are acutely aware of their responsibilities to promote and support the maintenance and improvement of academic quality in their institution in order to ensure their long term sustainability.' (Sector Representative Body)

336. Of those supporting the proposals, agreement was particular high among FECs, with 60 per cent of respondents noting either agreement or strong agreement. Among student bodies, 32 per cent broadly agreed with the proposals.

337. The majority of respondents commenting on this question, whether in agreement or disagreement, repeated the high-level comments that they had provided in answer to Question 11. Indeed, given their similar focus there was a high degree of consistency between respondents' replies to Questions 11 and 21, with a significant number simply referring to their earlier responses. In further detail, 25 comments focused on concerns about the capacity and capability of governing bodies to assume an enhanced role; 18

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[66] 238 respondents answered the Likert-scale component of this question.
[67] This figure reproduces Figure 20 in Part A.

touched on the possible tension between the roles of governing bodies and the supreme academic authority; and 15 comments suggested that such proposals would no longer allow comparability of outcomes to be secured across the sector. A large number of respondents (over 20) asked for more detail and consideration of how these proposals might be implemented in practice.

338.   Respondents, whether in agreement or disagreement, focused on some particular issues of the feasibility and appropriateness of providing assurances about the security and reasonable comparability of academic output standards. It was argued that while governing bodies could look at outputs on a year-by-year basis at institution level to avoid institutional performance drift, it would not be feasible for them to also compare across the sector.

> '…the assurances provided by governing bodies would be that the standards of their institution are secure, "meet expectations" or are in line with a baseline/benchmark; they cannot comment on the comparability of standards, which would require a detailed overview of the whole sector. Having received relevant assurances from governing bodies, the funding bodies themselves would then be in a position to assure Government and other stakeholders that standards are comparable across the sector.' (Publicly funded HEI)

339.   Other respondents referred to responses to other questions (for instance Question 19 on the calibration of academic output standards). Also in relation to assuring standards, five comments related to the clarity needed about the locus of responsibility in more complex arrangements. This includes those elements of provision which are not provided by the body with degree awarding powers, such as in collegiate universities where some of the educational provision is provided by colleges but the university has degree awarding powers, or provision from awarding bodies offering Higher National provision, such as Pearson Edexcel.

340.   A total of 58 respondents indicated that they neither agreed nor disagreed with the question. Of these, a majority partially supported the proposal but expressed reservations or indicated that further detail and development of the approach were required.

> '…we agree that governing bodies should provide assurances about student output standards, based on genuine engagement with recommendations and supporting evidence provided by the institution's senate or equivalent academic authority. However, we believe it would be inappropriate for governing bodies to become involved in the micro-management of those aspects… '(Publicly funded HEI).

341.   As with other respondents who neither agreed nor disagreed, the key concern expressed (in seven comments) related to possible tension between the roles of the governing body and the supreme academic body. These respondents also made 10 comments about the capability and capacity of governing bodies to take on this enhanced task, and the risk of a possible conflict of interest between their roles in assuring academic quality and standards and financial stability.

Question 22: Do you agree with the proposal to develop guidance to providers on a sensible range of degree classification algorithms at the pass-fail and 2i-2ii borderlines?

Figure 44: Responses to Question 22[68][69]
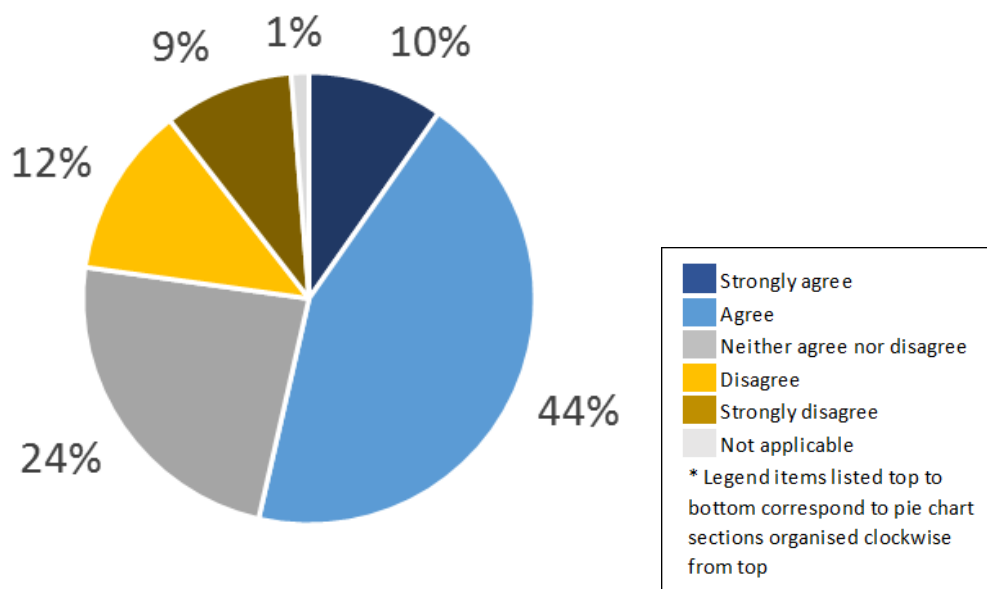
342. The majority of respondents agreed with these proposals. Of these, 19 comments said that guidance in this area would be welcomed and that it would need to be transparent, both in development and in its finished form. The emphasis of many responses was that the 'guidance' should not be mandatory or prescriptive, but guidelines for best practice. Others clarified that example algorithms would be helpful for those considering changing their current algorithms. While there was overall support for this question, responses from FECs, PSRBs and student organisations were particularly positive:

> '…These ought to be more clearly defined and systematised to give students reasons for their degree specification that are less arbitrary.' (Student organisation)

343. Respondents in agreement noted that the proposals would:

- improve the comparability and consistency of classifications, and therefore increase transparency across the sector (15 comments)

- assist the sector in its decision-making on applicants for postgraduate study

- help employers understand the level at which applicants have qualified

- remove discrepancies between awarding bodies

- increase student confidence in the classification they have received (seven comments);

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[68] 238 respondents answered the Likert-scale component of this question.
[69] This figure reproduces Figure 17 in Part A.

- reduce the pressure on academics to 'game the system' and help address the issue of grade inflation (five comments)

- improve the student experience, given that some students currently view the system as unfair.

  'While it is important to recognise the autonomy of institutions, students from different providers should feel that their qualifications are relatively comparable at the same degree classification.' (Publicly funded HEI)

344.   However, it was noted that a making a set of algorithms available would not eliminate variability.

  '…it will be important to manage the expectations of stakeholders about the usefulness of the range of algorithms in making comparisons between institutions.' (Publicly funded HEI).

345.   A few respondents recommended that sector bodies, employer organisations and alternative providers should all be involved in the process, with overall representation from across the sector and across discipline areas. Another group questioned the appropriateness of the Association of Heads of University Administration leading the taskforce (eight comments). A number of respondents suggested the involvement of other groups, such as the Academic Registrars' Council (four comments).

346.   A significant concern, raised by all types of respondents, was that giving a set of algorithms and guidelines that must be used across the sector would compromise the principle of institutional autonomy (43 comments). A total of 22 comments (regardless of whether or not respondents agreed with the proposals) expressed doubts about the feasibility of creating a finite set of algorithms, given the diversity of the sector, without requiring institutions to make major changes. A minority of respondents (four comments) noted that current differences in algorithms reflect the legitimate differences in disciplines and institutions. One specific example was that the full range of marks (0 to 100) was seen far more commonly in mathematical and scientific subject areas than in the humanities. This difference in range must therefore be accounted for in the algorithmic calculations, particularly if the aim of these proposals is to make degree classifications more comparable across subject areas as well as institutions.

347.   A further concern expressed in opposition to the question (eight comments) related to the focus on the 2i-2ii and pass-fail borderlines (38 comments). It was felt that this narrowed the scope of the proposal and that considering the entire grade spectrum would aid consistency. It was suggested that a focus on these borderlines might undermine efforts to encourage academics to use the full range of available marks. Employers were also struggling to make distinctions at the First-2i borderline, so this also needed consideration. However, one respondent welcomed this focus since differences at these borderlines could make significant difference to a student's future following graduation.

348.   Five particular comments were made that classifications outcomes were not purely based on algorithms. Other respondents made the point that consideration should also be given to other elements with a significant impact on final degree classification such as:

'…number and timing of resits/opportunities to retrieve credit; whether marks were capped at resit; penalties for plagiarism/collusion etc.' (Publicly funded HEI)

349. The group of respondents in disagreement with the question questioned the necessity of the proposal on the following grounds:

a. External examiners were already checking and reviewing the algorithms being used by institutions to ensure that they are 'sensible' (seven comments).

b. Increasing the transparency of the current system, rather than implementing an entirely new set of guidelines, would help to tackle some of the issues being raised.

'Where individual issues are identified across the sector these outliers and individual cases of failure should be dealt with quickly through existing quality assessment mechanisms (e.g. concerns scheme, protocol).' (Sector representative body).

c. Algorithms are already being tested and compared against other institutions in mission groups, so sector-wide guidance is not needed (one comment).

d. Employers and stakeholders are already aware of existing inconsistencies and it is not viewed as an issue of major concern (two comments).

350. Many respondents requested clarity on:

- whether this proposal would result in a set of guidelines or a set of requirements (14 comments)

- the linkages between classification algorithms, Grade Point Average and the Higher Education Achievement Record (16 comments)

- the effect this would have on current and former students (two comments)

- any implications for postgraduate classifications (nine comments)

- how a range of 'sensible' algorithms would be defined (six comments)

- why, given the consensus that the current system is outdated (eight comments), the proposal is not considering completely changing the classification system.

Question 23: Do you agree with our proposals to develop and implement a strengthened mechanism to investigate rapidly when there is an indication of serious problems within an individual provider which has not been addressed in a satisfactory and timely manner?

Figure 45: Responses to Question 23[70][71]
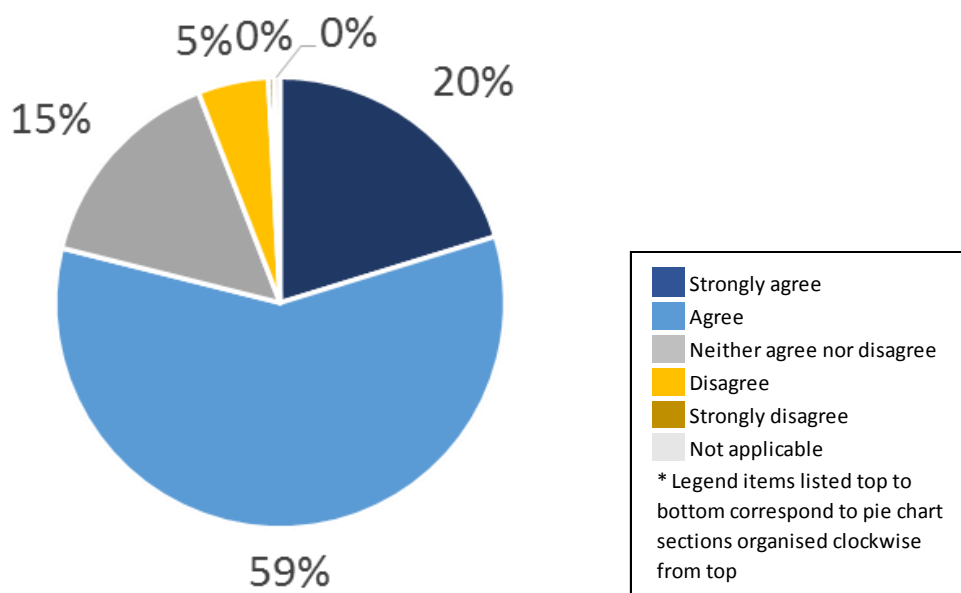
351. The large majority of respondents agreed or strongly agreed with the proposal, with only a very small number of respondents in disagreement. However, while the majority of respondents agreed in principle with the proposal, this was often followed by a number of comments requiring clarification or adding caveats. For example, many of the responses referred to a lack of detail (30 instances) on this issue that they believed had limited their capacity to respond. Sixty-six respondents did not provide a comment.

352. The importance of having a strengthened mechanism for investigation when things go wrong was reiterated in 28 comments. There was an emphasis on the importance of a proportionate (13 comments), transparent (14 comments) and timely (10 comments) system that would uphold education quality and standards.

> "Any new system must have rigorous processes in place to ensure that interventions are measured, appropriate and swift when things do go wrong" (Student organisation)

> 'It seems self-evident that an effective system of quality assessment should have recourse to interventionist options when there is evidence of problems' (Publicly funded HEI)

353. Respondents who neither agreed nor disagreed demonstrated a similar degree of support for a strengthened investigation process and further information to those who agreed (nine of 30 comments and nine of 30 comments respectively). However, the

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[70] 238 respondents answered the Likert-scale component of this question.
[71] This figure reproduces Figure22 in Part A.

former group commented more frequently on the effectiveness of the current system (seven comments), and the new proposals' similarity to it (six comments).

354. Respondents highlighted the similarity of the proposed investigative mechanism to the current QAA Concerns Scheme, with a number suggesting that any new arrangement should build on or strengthen the current system. Of the 19 respondents who mentioned the similarities, 12 agreed with, six were neutral to and one disagreed with the proposals.

> 'The cause for concern scheme provides this mechanism but could benefit from enhancement to ensure that the scheme is more responsive to institutional context.' (Publicly funded HEI)

355. Respondents commented in 23 instances that the current system was sufficient in addressing this question and that strengthening it was unnecessary. This was of particular concern to those disagreeing (seven of 23 comments).

356. Those who agreed with the proposals asked in 26 comments what would constitute a serious or material issue (respondents who were neutral raised this four times). A number of responses supported the notion that providers should have sufficient time to address concerns themselves before an external review was triggered (10 comments). Eight comments supported an escalatory approach whereby the process was not made public while investigations were under way. Some of the responses (four comments) emphasised the importance of balancing transparency with protecting the provider's reputation.

357. A small number of responses flagged the issue of adding to an already crowded landscape and duplicating work done by others, such as the OIA (eight comments). Concerns were also raised by some about the reliance on other bodies to report issues to the funding body. Examples included the length of time an OIA investigation takes, and CMA's market rather than individual student focus.

> 'Whilst the idea of an investigation mechanism is a good one, the proposals do not adequately show how such a mechanism would avoid merely adding to the current complaint routes (e.g. OIA, CMA, PSRBs).' (Publicly funded HEI)

358. There was a strong message that students and student unions required a clear avenue to trigger a review. This was raised 11 times by student organisations, all of who agreed with the proposal. There was also a recommendation that the detailed design should place an emphasis on students (three comments).

359. Other themes and questions raised were:

- the need for clarity about an appeals process (five comments)
- how this would fit with validating relationships and the importance of treating all providers fairly (one comment)
- the appropriateness of the funding bodies taking a greater role in this (two comments)
- the need for meaningful and appropriate sanctions against a provider when things do go wrong (four comments).

360. A number of Welsh respondents also highlighted that this issue would be consulted on as part of the Higher Education (Wales) Act:

> '…for the Welsh sector, this is one of the areas that will be consulted upon and developed (in the form of a "Statement of Intervention") as part of the implementation of the HE (Wales) Act from 1 September 2015.' (Publicly funded HEI)

Question 24: Should the mechanism to investigate problems in an individual provider require, in addition to the investigation of the specific issue of concern, the re-testing of the arrangements in the provider under review against the baseline requirements set out for the gateway for entry to the higher education system?

Figure 46: Responses to Question 24[72]
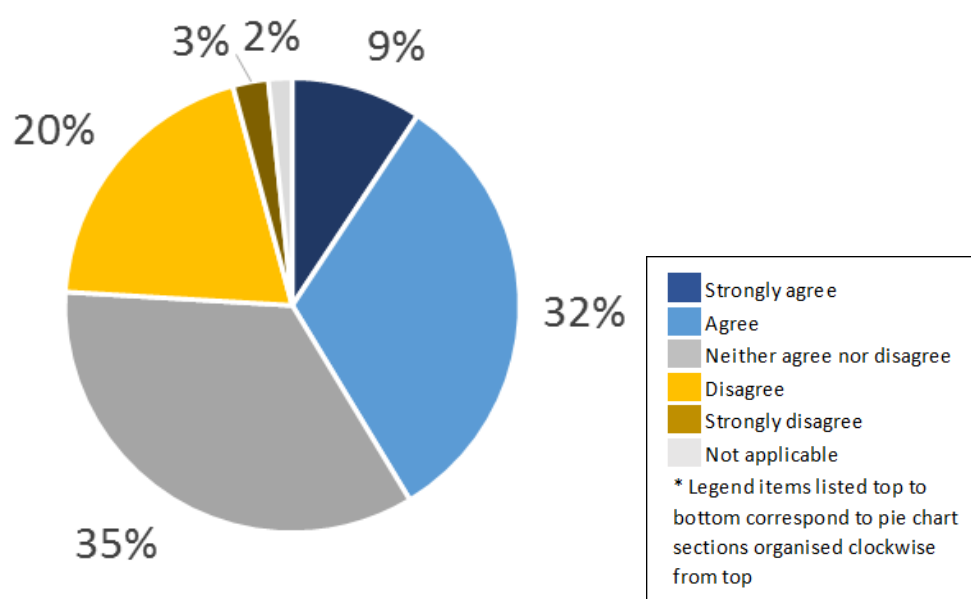
361. The most common single response to this proposal was 'neither agree nor disagree'. Of the 55 respondents who chose not to comment, 37 agreed with the proposal. Most of the comments for this proposal were relatively short.

362. The degrees of agreement and disagreement were broadly similar among HEIs, whereas FECs were more polarised, with a greater proportion that strongly agreed or disagreed. Student groups were much more positive about the proposal, with 63 per cent split between 'strongly agree' and 'agree', and only 7 per cent selecting 'disagree'. PSRBs were also slightly more positive than the overall picture.

363. The overriding message (from over 80 comments) was that a re-testing of baseline requirements should not be automatic but should depend on the nature and severity of the case. There was general agreement that it should be triggered when an issue is severe (18 comments), indicates systemic issues rather than an isolated incident (18

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[72] 238 respondents answered the Likert-scale component of this question.

comments), or suggests that the baseline requirements are not being met (seven comments).

364.   Other suggestions for triggers of re-testing included where a provider has failed to address the initial concern or to engage with the process (five comments), where there have been repeated triggers (six comments) or where the initial investigation uncovers wider issues (three comments).

365.   While most comments supporting the proposals included some such caveat, 14 comments suggested that the baseline requirement for quality should be re-tested in every case. In many cases this was based on the principle that a serious concern in an institution could indicate wider quality issues. The majority of these responses came from student organisations.

366.   As with many of the proposal areas, the comments of those respondents who disagreed with this proposal expressed similar concerns to those who had agreed – in this case, that an automatic re-testing of baseline requirements would be disproportionate in many cases and that this should depend on the nature of the issue.

> '…where there is no evidence that it is not an isolated incident, or where the concern can be resolved through a specific remedy (e.g. staff training or disciplinary procedures) then there is no reason to assume that the baseline requirements are not being met.' (Publicly funded HEI)

367.   Respondents who neither agreed nor disagreed said that there was a role for testing against the baseline, but that conditions should apply. For example it should not be assumed that one issue indicated a wider problem (five comments), there was a need for clear parameters (four comments), for investigation with a strong evidence base (three comments), and for a range of available responses (15 comments) which could be applied proportionately (eight comments). In contrast seven respondents who disagreed with the proposal made comments explicitly registering that they did not agree with repeat testing without extensive amendments to the proposals.

368.   One of the responses suggested that this would contradict earlier proposals relating to the principle of not intervening when baseline requirements were being met:

> '…If an evidence/risk-based approach underpins the new form of quality assessment, then why would an area be investigated if there was no evidence to suggest it needed to be? To do so would compromise the principles, could lead to a sense of "victimisation" and mistrust.' (Publicly funded HEI)

369.   A common response, mentioned a total of 25 times, was that this might be one of a range of options available and the action should be proportionate. A small number of comments (five) emphasised that this should be the final sanction after other mechanisms have proved unsuccessful.

370.   A number of responses also suggested:

- the need to ensure that the original issue which triggered the investigation was substantiated before a re-testing took place (10 comments)

- that the re-testing should be based on clear evidence (seven comments).

- the need for clear parameters around what would trigger a re-testing and clear systems in place around this

- that the investigation should look at closely linked areas only (seven comments)

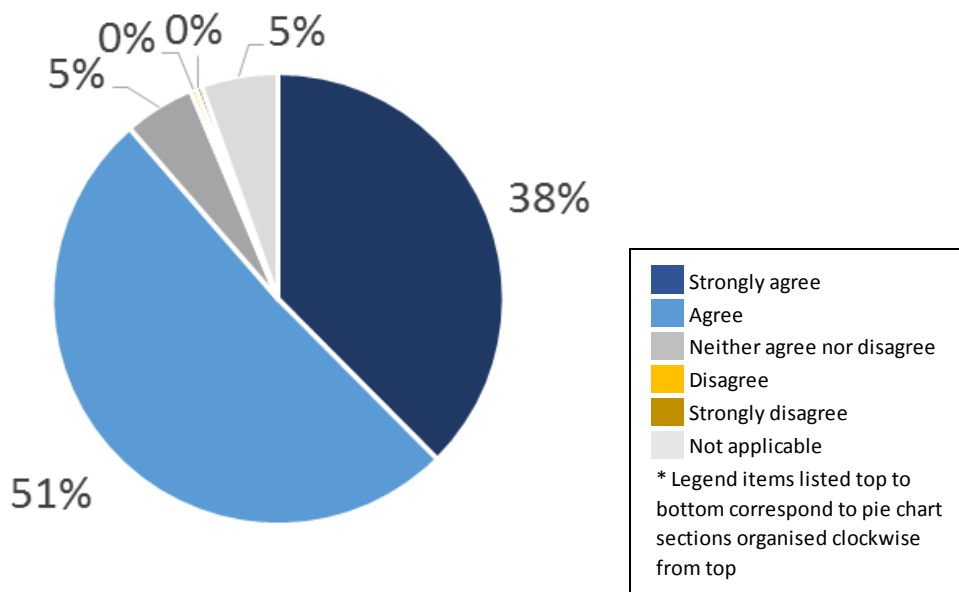- The joining up of this process with PSRBs and their approaches (two comments).

371. An issue highlighted by a small number of respondents was that a case-by-case approach should consider not just the nature of the issue but also the type of provider, its maturity and its track record relating to QA. However, an alternative provider response states that sanctions should be the same for all providers.

> 'However, it also depends on future plans for TDAP [taught degree awarding powers], as a growth in private providers with TDAP does raise issues with regard to quality assurance. Perhaps HEIs newly granted TDAP should be subject to a different type of review, similar to a probationary period.' (Publicly funded HEI)

372. Two responses from student organisations highlighted the importance of including students in the development of this proposal, but also protecting the student interest while investigations are going on.

Question 25: Do you agree with the proposal that providers seeking entry to the publicly funded sector in England and Northern Ireland should be tested, through an external peer review scrutiny process, against a set of baseline requirements for quality?

Figure 47: Responses to Question 25[73][74]

Legend:
- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not applicable

* Legend items listed top to bottom correspond to pie chart sections organised clockwise from top

Pie chart values: 38%, 51%, 5%, 0%, 0%, 5%

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[73] 238 respondents answered the Likert-scale component of this question.
[74] This figure reproduces Figure 7 in Part A.

373. The proposal that providers seeking entry to the publicly funded sector should be tested, through peer review, against the baseline requirement received the greatest level of support in this consultation.

> 'Yes, we strongly agree with this principle to safeguard the reputation and standing of provision and to maintain a level playing field.' (Sector representative body)

374. Only half of respondents provided any supporting commentary, and these comments were often brief. Many issues were only raised by 10 or fewer respondents.

375. Among those who commented there was a general view that the requirements should help to maintain the reputation of UK HE (11 comments) and that requirements for entry should be rigorous (eight comments) and at or above the current requirements (10 comments). Six comments stated that the Quality Code should be a minimum requirement. A few respondents did give an alternative view that conditions for entry should be based on a streamlined version of the current Quality Code (five comments). There were some concerns expressed about a 'one size fits all' approach, which respondents argued would not appropriately differentiate between different types of providers (for example, a small specialist provider or an FEC (seven comments).

376. It was also suggested that a broader set of issues should be considered when judging a provider's suitability to enter the system (three comments).

> 'There is probably room for other tests of appropriateness, beyond those associated with quality assurance, that need to be passed by providers who wish to join the sector (e.g. financial sustainability, likely market, mission and values)'. (Publicly funded HEI).

377. A number of respondents suggested ways to ensure that the proposed peer review process provided reliable assurances to a range of stakeholders, and that it would operate on the basis of a level playing field. These included the need to use trained and high-quality peer and student reviewers (18 comments).

378. Some responses to this question referred to comments made in response to Question 14 on proposals for a probationary period for new entrants to the publicly funded sector (10 comments).

379. Not all respondents had appreciated that the consultation question related only to those providers seeking entry to the publicly funded sector, rather than to all potential new entrants to the HE system. Among those who had understood this issue, there was some concern that the consultation proposals did not cover arrangements for new alternative providers. They argued that appropriately robust arrangements for these providers continued to be essential.

> 'We continue to believe that one of the greatest threats to academic quality and standards in UK higher education results from a growing for-profit higher education sector.' (Sector representative body).

380. Only two respondents explicitly disagreed with the proposal –in both cases on the basis that the baseline requirement was not adequately defined. No significant issues were expressed by those who neither agreed nor disagreed.

Question 26: Are there any particular areas of our proposals that you feel we should concentrate on as we undertake a more detailed design phase?

381.   Fifty-seven respondents chose not to answer this question.

382.   Those who answered this question used the opportunity to comment on specific areas that they wished to see considered further during the design phase, and to draw attention to areas that they felt required more attention through continued dialogue with stakeholders. Respondents focused on the following elements to consider in the detailed design phase.

383.   Fifty-three respondents (predominantly providers, sector representative bodies and student organisations) made references to the relationship between the design of the future arrangements for quality assessment and the TEF. It is clear that there is a strong desire for the QA and TEF proposals to be designed and implemented as a single coherent system, with embedded external peer review. A number of respondents also made the case for a single regulatory system that integrated the Research Excellence Framework with the QA and TEF proposals to produce a single coherent system for research and teaching assessment.

384.   A significant proportion of responses argued that particular attention should be given in the design phase to the development of systems for using student outcomes data and metrics (50 comments). Many respondents drew attention to issues they had raised in response to Questions 8 and 9. These included concerns about the validity, robustness, and potential manipulation of outcomes data, and about developing a shared understanding of what constituted a high-quality academic student experience.

385.   Similarly 27 comments focused on the need to articulate better how student engagement and partnership would be embedded across the different elements of the proposals.

386.   The external examining proposals also generated a large number of comments (38), drawing attention to issues raised in response to Questions 17 to 19. These included a need to focus in the design phase on how proposals such as the proposed register of external examiners and calibration activities might work in practice, and the role and responsibilities of those providers with and without degree-awarding powers. Respondents raised logistical concerns that would need to be considered further, such as how to ensure that the proposals did not have a negative impact on individual academics or on the broader recruitment of suitably qualified examiners. Similarly, issues of confidentiality, transparency and international working would all warrant further consideration.

387.   Approximately 50 respondents also commented on the need to focus on how the proposals for strengthening the role of governing bodies might be developed further. These comments suggest that further discussion would be required to ensure that the important roles of senates and academic boards were protected, and that burden and cost were not simply transferred from the current arrangements into individual providers. There was also a desire to explore approaches to training for governing bodies as part of pilot activities.

388.   A small number of respondents called for confirmation of how the proposals would avoid UK policy divergence and fragmentation, and there was agreement about the continued need to articulate the expectations of all providers across the UK (27 comments). Respondents repeated comments made elsewhere that there would be a need to develop a meaningful set of baseline requirements that aligned with those required by professional bodies, with the European Standards and Guidelines, and with the Home Office's requirements for meeting the needs of Tier 4 sponsorship. There was some support for the UK Quality Code being used as the basis for this.

389.   Small numbers of comments sought clarity on particular elements in the design phase, including: the process for 'when things go wrong' (nine comments), applicability to postgraduate provision (nine comments), how the different elements aligned with the agreed principles (four comments), publication of reports about providers (two comments), international benchmarking (one comment) and consideration of teaching observation (one comment).

Question 27: Are there proposals not referred to above that you feel we should have in consideration? If so, what are they and what is the rationale for their inclusion?

390.   Respondents indicated a number of key areas that required further consideration. A total of 118 respondents chose not to answer this question.

391.   The most common comments (43) questioned the relationship of the funding bodies' proposals for quality assessment with the Government's plans for a TEF. Comments reiterated those expressed elsewhere that the QA and TEF proposals should be designed and implemented as a single coherent system, and that external peer review should be embedded in this system along with a means to capture the contribution of innovation. Respondents of all types were clear that undue burden and duplication of effort should be avoided.

392.   A number of respondents (21) commented on the benefits of student involvement and engagement across the full range of quality assurance and assessment activities. Many stakeholders called on the HE funding bodies to ensure that meaningful approaches to student engagement would be embedded in the new arrangements, which recognised the diversity of the student body and the challenges and opportunities that the new arrangements might offer across the different areas. Student organisations were particularly keen to develop a system which allowed for the involvement of student representation at all levels of the system, and which might allow for some form of independent student assessment, separate from that of individual providers.

393.   A very small number of others (five comments) questioned the rationale for the funding bodies' review of quality assessment and asked whether the current arrangements necessarily required an overhaul. A similar small number of respondents (including some of those in Scotland) cited the Quality Enhancement Institutional Review mechanism in Scotland as a valuable model to consider, alongside a prevailing view that the approach across the UK should be based on a common framework to sustain the reputation of UK higher education and provide a UK-wide comparison. A minority of respondents (10 comments) suggested that having an independent national body (whether the QAA or another) providing guidance and expertise on quality assurance

would be valuable. There was support for the continuation of some form of external peer review (20 comments). Similarly, some respondents called for a greater focus on enhancement in the new arrangements (20 comments), and clarity on how the approach would apply to postgraduate provision (10 comments).

394.   A small number of providers were particularly concerned about the implications of the new arrangements in terms of potentially increased costs and burden (13 comments), and also the maintenance of the system at the national level (in particular those elements relating to the external examining proposals, which attracted 11 comments).

395.   Respondents were also concerned to ensure that some form of UK-wide 'read-across' was maintained and that the reputation of UK HE was upheld (21 comments).

Question 28: Are there any particular areas pertinent to the devolved nature of higher education in Wales and Northern Ireland that you feel we should have considered further? If so, what are they and what is the rationale for their inclusion?

396.   For the most part, respondents to the consultation proposals based in Wales and Northern Ireland echoed those of English respondents.

397.   Responses from across the three countries called for a reasonable degree of consistency across the UK nations, to protect the student interest and maintain the brand of UK HE in attracting students nationally and internationally.

Responses from Northern Ireland

398.   There were only four responses specifically from Northern Ireland in response to this question.

399.   HE providers raised explicit concerns about avoiding the fragmentation of a UK HE sector and the ability to benchmark against other institutions if Northern Ireland adopted different quality assessment arrangements from England.

400.   Student responses highlighted the need for sufficient resources to be made available to support student engagement and partnership in any future quality assessment arrangements.

401.   There was a low level of concern about potential risks associated with a lack of independent and transparent scrutiny of the Northern Ireland HE providers.

402.   There was recognition that both the DELNI and the Department of Agriculture and Rural Development needed to be involved, as both fund HE provision in Northern Ireland.

Responses from Wales

403.   There were 10 responses to this question from organisations in Wales, predominantly from HE providers.

404.   Some of the issues raised related to the implementation of the Higher Education (Wales) Act from September 2015, and uncertainties about how the new arrangements would affect the sector. There was a concern that the concomitant timing of the Act and the consultation on quality assessment had limited the capacity of Welsh providers to provide a full response.

405.   Particular issues related to Welsh language requirements and compliance with the 1993 Welsh Language Act. In particular, respondents focused on how the proposals for strengthening external examining would take account of Welsh-medium provision, and how the need for examiners with Welsh fluency would be captured and recorded in any register of external examiners. There was recognition that further work with the Welsh Language Commissioner might be required.

406.   There was recognition of the successful partnership working of the Welsh Government, the National Union of Students Wales and HEFCW in taking forward work on student partnership, and it was hoped that the new arrangements would provide opportunities for this work to be extended and embedded further.

List of abbreviations

CMA	Competition and Markets Authority
CPD	Continuing professional development
DELNI	Department for Employment and Learning Northern Ireland
DLHE	Destination of Leavers from Higher Education survey
FEC	Further education college
HAR	HEFCE Assurance Review
HE	Higher education
HEA	Higher Education Academy
HEFCE	Higher Education Funding Council for England
HEFCW	Higher Education Funding Council for Wales
HEI	Higher education institution
HER	Higher Education Review
HESA	Higher Education Statistics Agency
NSS	National Student Survey
OIA	Office of the Independent Adjudicator
PSRB	Professional, statutory or regulatory body
QA	Quality assurance
QAA	Quality Assurance Agency for Higher Education
TDAP	Taught degree awarding powers
TEF	Teaching Excellence Framework