



Promoting higher quality

**The Quality Assurance Agency
for Higher Education**

QAA external review process for higher education in England:
Operational description

March 2002

Quality Assurance Agency for Higher Education

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Purpose

- 1 This document describes the operational model for the external quality assurance of higher education in England that will operate from 2002-2003. It is based on proposals contained in the consultative document (HEFCE 01/45), modified in the light of the responses to the consultation and subsequent discussions between HEFCE, the Agency, SCOP and UUK. It has been agreed by all four bodies and has been endorsed by the Department for Education and Skills. Although it is not formally the subject of a consultation, informal views or comments from readers will be welcome (please send to m.coke@qaa.ac.uk). The Agency will now draft a detailed handbook on which it will consult institutions and others. It expects the draft handbook to be available in April 2002.

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Background and context

- 3 The proposals in this document form part of a wider package to develop a new approach to quality assurance in higher education in England. The key factors are:
 - Over the past eight years, there has been a comprehensive programme of external peer review at subject level, covering all main subject areas in all higher education institutions in England. That programme was completed in December 2001. It demonstrated that, in general, the quality of higher education programmes is very high, with only a small minority of programmes found to be failing or in need of substantial improvement. The review programme has provided a rich evidence base on the performance of all the HEIs in England. It has also had the effect of promoting the development of more comprehensive and rigorous internal quality assurance procedures within HEIs.
 - We are now therefore in a position where the future quality assurance approach can be much more selective. It can rely more than previously on internal HEI quality procedures. And it can focus on identifying, and following up, areas of concern, consistent with the principle of 'intervention in inverse proportion to success'.

- At the same time, however, the future approach must be rigorous and robust in securing the accountability of HEIs, and in providing the information which students, parents, employers and other stakeholders need on the quality and standards of different HEIs and programmes. The approach must test whether HEIs' internal procedures really are effective in setting, monitoring and enhancing quality and standards of all programmes; and whether the information which each HEI provides about its programmes is valid and fair. The approach must be able to identify where there are weaknesses, and ensure rapid and vigorous action to address them.
- 4 In July 2001, HEFCE, the Agency, SCOP and UUK published a consultation document (HEFCE 01/45), which set out proposals for a revised method of quality assurance of the higher education in English HEIs. It focused on an audit approach, which would review at whole institution level the HEI's approach to safeguarding quality and standards, with follow up reviews as necessary at subject level to address any areas of concern. A full report on the responses to HEFCE 01/45 was published by the Agency during the first week of December 2001¹.
 - 5 Between September and November 2001, in response to one of the proposals in HEFCE 01/45, a Task Group, under the chairmanship of Professor Ron Cooke, Vice-Chancellor of the University of York, prepared recommendations (HEFCE 01/66) on the information about quality and standards that all higher education institutions should be expected to collect and have available. The Task Group also recommended which elements of that information should be publicly available. The published information would include summaries of external examiners' reports, the results of student feedback surveys, summaries of the HEI's own programme reviews, and information on the institution's strategy for raising the quality of learning and teaching. The report on the outcome of the consultation on those proposals will be published in due course. In the meantime, agreement has been reached between the principal players on the nature of both the published and unpublished information that institutions will be expected to produce.
 - 6 The Agency has, in the meantime, been developing a description of how the proposals for external quality assurance in HEFCE 01/45 might work in practice. A Preliminary Operational Description (POD) was circulated informally within the sector to show the sort of process that might be involved. This has now been developed further in the light of the responses to HEFCE 01/45 and of consequent discussions with HEFCE, SCOP and UUK. The process now described here also reflects HEFCE's requirements in respect of the level and nature of review that it considers necessary to enable it to meet its statutory obligations.

The responses to HEFCE 01/45

- 7 In summary, most replies to HEFCE 01/45 supported the general direction of the proposals. They also indicated a number of areas where respondents believed that improvements might be made. Many of these have been taken into account in the present document. In two particular areas, however, there was clear consensus that the proposals raised serious difficulties and needed reconsidering. The first was the form and function of the proposed audit trails, or 'subject drill-downs', to be undertaken by subject specialist members of an audit team. These were felt by many respondents to be too readily interpreted as subject review by another name, with the associated danger of a continuation of the excessive level of burden identified by the Report on Better Accountability in Higher Education produced for HEFCE by PA Consulting in 2000 (HEFCE 00/36)². The second area of apprehension related to the information requirements which have been proposed by the Information Task Group (HEFCE 01/66). The absence of sufficient detail in the previous consultation document HEFCE 01/45, made many respondents reluctant to commit themselves to endorsing this part of the proposals, while others feared that the demands likely to be made would be unacceptably burdensome.
8. The Agency, along with its partners HEFCE, UUK, and SCOP, has taken these major concerns seriously. In consequence, the present operational description proposes an institutional audit scheme which does not involve, in the first instance, the routine inclusion of subject specialists in the audit teams (although subject specialist advisers will be brought in if need arises). Instead, it relies on audit teams making more generic judgements, informed by scrutiny of a sample range of discipline areas or themes, about quality and standards as delivered in practice. In revising the consultative document's proposals, due recognition has been given to the necessity, emphasised particularly by HEFCE and agreed by UUK and SCOP, of ensuring that the security and reliability of internal review can be demonstrated through access by the audit team to primary evidence of the academic standards being achieved by students, and of the quality of what is being offered to students to help them reach the necessary standards. This is also consistent with the views expressed by student bodies.
- 9 Another important principle brought out in the consultation discussions related to the involvement of external academic peers in the programme and departmental reviews which HEIs organise for themselves. Such internal reviews can be greatly strengthened by including such external peers in review teams, and the Agency will in future consider this to be standard good practice.

¹ http://www.qaa.ac.uk/crntwork/newmethod/01_45rep.htm

² http://www.hefce.ac.uk/Pubs/hefce/2000/00_36.htm

- 10 HEFCE 01/45 envisaged that full subject-level reviews would be conducted on a selective basis, principally either to follow up areas of concern or weakness identified during an institutional audit, or to meet the requirements, including accreditation requirements, of professional and statutory bodies in relation to programmes which prepare students to practise a particular profession (and where review is not undertaken by the bodies themselves; in practice the consultation responses suggest that most PSBs will maintain their own review mechanisms for accreditation purposes). It was also suggested that during the three year transitional period, 2002-2005, there would be a limited and selective form of subject review for institutions, pending their institutional audit. Following further discussions by HEFCE, the Agency, UUK and SCOP, it has been agreed that for most institutions there will be no further subject reviews, but there will be a new, developmentally-focused, form of engagement at the discipline level during the transitional period. Subject reviews will only be undertaken in very limited circumstances and where specific criteria apply. Annex A describes both the new form of developmental engagement and the circumstances in which subject reviews will be conducted.
- 11 Responses from colleges in the Further Education sector were not in favour of a regime of universal subject review being applied to them alone. The Agency understands, however, that both HEFCE and DfES expect a full programme of subject review to be implemented, and that HEFCE will contract with the Agency on that basis. HEFCE has held further discussions with representatives of the FE sector, and intends to issue shortly a statement explaining the principles and approach proposed for FE colleges.
- 12 Further reflection within the Agency has led to the conclusion that a six-year cycle of institutional audits would be preferable to the five-year cycle envisaged in HEFCE 01/45. This will allow institutions more time to implement their own full programme of internal reviews while generally lessening the intensity of the burden of external quality assurance. HEFCE, UUK and SCOP have confirmed that they agree with this revision. The Agency will also be considering ways in which those institutions that have had a continuation audit in the past three years (ie calendar years 1999-2001) might be subject to a less extensive process during the shorter first cycle than those that have either not had a continuation audit or whose audit was longer ago.
- 13 Throughout the six year period, each HEI will be making publicly available a range of up-to-date information on quality and standards, and will be conducting its own internal monitoring and review procedures. At the three year mid-point, the Agency will expect to revisit each institution, not to conduct a full institutional audit, but to review progress since the previous institutional audit and to discuss the institution's strategic plan for sustaining and raising quality and standards over the three years until the next institutional audit.

Aims and objectives

- 14 The aims of this external academic review process are to meet the public interest in knowing that English universities and colleges are:
 - providing higher education, awards and qualifications of both an acceptable quality and an appropriate academic standard;
 and (where relevant):
 - exercising their legal powers to award degrees in a proper manner.
- 15 The objectives of the process are:
 - to contribute, in conjunction with other mechanisms, to the promotion and enhancement of high quality in teaching and learning;
 - to ensure that students, employers and others can have ready access to easily understood, reliable and meaningful public information about the extent to which the higher education institutions (HEIs) in England are individually offering programmes of study, awards and qualifications that meet general national expectations in respect of academic standards and quality;
 - to ensure that if the standards or quality of HE programmes are found to be weak or seriously deficient, the process forms a basis for ensuring rapid action to improve them; and
 - to provide a means of securing accountability for the use of public funds received by HEIs.

A note on nomenclature

- 16 Over recent years a number of words commonly used in higher education have acquired the status of 'terms of art' when used in the context of quality assurance. These include **subject**, **course** and **programme**. In order that readers should not misunderstand the way these words are being used in this document, the following meanings should be understood:
- the use of **subject** is limited here to references to the Agency's 42 subject categorisation, the associated subject review procedure(s) published by the Agency, and the *Subject benchmark statements* developed by academic communities under the aegis of the Agency and revised in the light of experience and developing academic practice and provision. In order to allow institutions to relate the proposals in this paper more readily to their own internal structures and activities, the word **discipline** (and its derivatives) is used in preference to 'subject' where it is wished to denote defined or delineated areas of academic endeavour but without reference to the 42 subject categorisation;
 - **programme**, or **programme of study** is used to mean the full diet of courses, modules, options, and other 'structured learning opportunities', which together comprise a pathway that leads to the award or qualification being sought;
 - **course** is a word with different meanings and resonances in different institutions, ranging from full programmes of study to elements or sub-elements (eg modules). In order to avoid confusion caused by local usages, it is not used in this paper.

Outline of the process

- 17 Institutional audits will examine three main areas:
- the effectiveness of institutions' internal quality assurance structures and mechanisms, in the light of QAA's *Code of practice*, and the way in which the quality of its programmes and standards of its awards are regularly reviewed and resulting recommendations implemented. This will provide public information on an institution's soundness as a provider of tertiary qualifications of national and international standing;
 - the accuracy, completeness and reliability of the information, including programme specifications, that an institution publishes about the quality of its programmes and the standards of its awards. This will provide information on the trust that can be placed in an institution's own published description of its quality and standards; it will also make that description more useful to students and other interested parties;
 - a number of examples of the institution's internal quality assurance processes at work at the level of the programme ('discipline audit trails') or across the institution as a whole ('thematic enquiries'), in order to demonstrate the validity and reliability of the information being generated by these internal processes about the quality and standards being delivered. As a general guide, those examples are expected to represent some 10 per cent of the institution's higher education programmes as measured by student FTEs - this is discussed further in paragraph 48 below. External reference points for this purpose will be *The framework for higher education qualifications in England Wales and Northern Ireland (FHEQ)*,³ the Agency's *Code of practice* and *Subject benchmark statements*.

Judgements

- 18 In the light of all the information available to them, institutional audit teams will provide principal judgements on:
- the level of confidence that can reasonably be placed in the soundness of the institution's management of the quality of its programmes and the academic standards of its awards; and, through direct scrutiny of primary evidence, whether the institution is securing acceptable academic standards and quality;
 - the level of reliance that can reasonably be placed on the accuracy, integrity completeness and frankness of the information that an institution publishes about the quality of its programmes and the standards of its awards. This judgement will take into account the audit team's findings in respect of the quality and standards of the provision it has looked at in the discipline audit trails, augmented, where necessary, by advice from subject specialists.

³ <http://www.qaa.ac.uk/crntwork/nqf/nqf.htm>

The Framework for Higher Education Qualifications in England, Wales and Northern Ireland (FHEQ) is sometimes referred to as the 'National Qualifications Framework' or 'NQF'. The National Qualifications Framework is more properly the name of the framework developed by the QCA for qualifications other than those awarded by higher education institutions. In this document the abbreviation FHEQ is used instead of NQF.

- 19 An expression of confidence is a statement about the likely future security of the quality of an institution's programmes and the academic standards of its awards. It is, in essence, a judgement of probability. At the same time, total confidence can be placed in very little, certainly not the future: as has been frequently noted, past achievement is no guarantee of future performance - it can be no more than an indicator of probability. Audit teams are not asked to make binary 'pass/fail' judgements as if they were accrediting programmes or institutions. Statements of confidence produced through external reviews can therefore never be unconditional; they are determined by audit teams' professionally informed views of an institution's capacity to manage quality and standards in an effective way once the review is finished and the reviewers have gone. And the usefulness of that judgement will, inevitably, diminish with the passage of time.
- 20 Because of this, audit teams will not make simple binary judgements indicating 'confidence' or 'no confidence'. Where they find institutions that are managing quality and standards soundly and effectively, and where the prospects for the future continuation of this appear good, they might be expected to express their 'broad confidence'. Where they have doubts, either about the current assurance of quality and standards, or about an institution's ability to maintain quality and standards in the future, they will make a judgement in a form that indicates whether their concerns are limited to a small number of matters or are more widespread, and whether or not these matters place academic standards at risk. In these circumstances a team might qualify its judgement of confidence. In all cases audit teams will be required to indicate clearly the areas of concern that have given rise to any limitation of confidence. Where the agreed subsequent procedures reveal that quality or standards are indeed a cause for concern, there must be no equivocation in making that clear. Cases of failing or unsatisfactory provision have been shown to be very rare in higher education. But where they do occur students and other stakeholders have a right to know, and it is one of the purposes of the review process to identify such cases.
- 21 Institutional audit reports will include recommendations for further consideration by the institution and will identify (with an explanation) any area where the audit team considers there is good reason for a full review at the subject or discipline level to be carried out, or where it considers that an action plan at either the discipline or institutional level should be implemented by the institution.
- 22 Institutional audit reports will also include comments on other matters, including the characteristics, strengths and limitations of the institution's internal quality assurance methods. They will comment on the quality and standards achieved in practice, including the findings from the discipline audit trails and thematic enquiries (see paragraphs 47 to 54 below).

Focuses

- 23 The scope of the audit process covers the overall management of quality and standards, as well as more specific areas of enquiry. Audit teams will need to ensure that they have enough general information and understanding about an institution and its quality assurance methods to enable them to make their judgements of confidence. For much of their time, however, they will focus their exploration on the following topics:
- publicly available information on quality and standards;
 - internal systems for the management of information and their contribution to the effective oversight of quality and standards;
 - internal quality assurance reviews and their outcomes, especially at the level of the discipline and/or programme;
 - the experience of students as learners;
 - the academic standards expected and achieved by students;
 - the use made of *The framework for higher education qualifications*;
 - the use made of the precepts of the *Codes of practice*;
 - the use made of *Subject benchmark statements*;
 - the development, use and publication of programme specifications;
 - the quality assurance of teaching staff, including the criteria for appointment of academic staff and the ways in which teaching effectiveness is appraised, improved and rewarded.

- 24 Audit teams will not expect to see mechanistic or 'checklist' approaches to these areas of enquiry being adopted by institutions but will be looking for evidence of a careful, serious and professional engagement with them on the part of the institution, with the purpose of ensuring that its academic quality and standards are being managed in a manner that can engender and maintain public confidence. Teams will also wish to assure themselves that, in the approach to the provision of public information on quality and standards, institutions' policies and practices are characterised by honesty, objectivity and candour.
- 25 There are two areas where audit teams will find it difficult to express a high level of confidence if certain elements are seen to be missing. The first of these is a strong and scrupulous use of fully independent external examiners in summative assessment procedures, and the second is a similar use of independent external participants in internal review at discipline and/or programme level. UUK and SCOP intend to take forward work to ensure that the external examiner system is operating in a way that can command the respect of the public at large as an effective guardian of academic quality and standards. The Agency's own *Code of practice* also offers guidance on these matters, with a view to ensuring that external examining operates consistently and in accordance with recognised good practice across all HEIs. This will be reinforced by the publication of summaries of external examiner reports, as recommended by the Information Task Group.

Information

- 26 To enable them to form their judgements, institutional audit teams will have available to them a variety of information sources about an institution:
- the information set (as determined by the work of the Information Task Group), including both the internal elements and those elements which are published (see HEFCE 01/66 for details);
 - the institution's self-evaluation documents (SEDs), which will remain confidential between the institution and the Agency;
 - information submitted by bodies representing students within the institution, which will remain confidential between the Agency and those submitting it;
 - information about the specific discipline areas which are going to be covered by the discipline audit trails as described in paragraphs 47-52 below. That information will demonstrate how, within the selected discipline area, the institution's quality assurance procedures are applied in practice, including evidence of student achievement;
 - (within agreed expiry dates) reports from the Agency and other sources (eg professional and statutory bodies);
 - information (written or oral) acquired during the visit.

Auditors and audit teams

- 27 **Roles.** Institutional audit teams will normally comprise between four and eight auditors and an audit secretary, who will provide administrative support and fulfil the primary co-ordination and liaison function during the visit. The two roles will be clearly defined. The precise size of the audit team will depend upon the nature of the institution being audited. Very large or particularly complex institutions will need more auditors in order to ensure that sufficient evidence can be obtained to justify the judgements and comments being made. In the case of small or specialist institutions four auditors will generally suffice. Most auditors will be expected to have both institutional-level expertise and skills and sufficient understanding of a broad academic field to allow them to take an informed view on matters related to academic quality and standards in that field.
- 28 **Selection.** Auditors will be selected by the Agency from nominations made by institutions and we assume that there will be a general willingness to offer names. We also assume that institutions will nominate persons with sufficient knowledge, expertise and technical capacity to ensure that audits are carried out in a competent, professional and credible way. Selection criteria for auditors will be published and every attempt will be made to ensure that the auditor cohort reflects appropriate 'sectoral', discipline, geographical, gender and ethnic balances. Institutional auditors' discipline expertise and an institution's spread of disciplines will both be taken into account in the construction of audit teams, so as to provide a sufficient spread of knowledge for an informed view to be taken of primary evidence relating to quality and standards encountered during the audit.
- 29 Audit secretaries will be recruited from amongst administrative staff in institutions. Audit secretaries (in common with auditors) will not be appointed to teams auditing their own institution.

- 30 **Training.** Training for auditors and audit secretaries will be undertaken by the Agency either directly or in collaboration with appropriate training providers.
- 31 The purpose of the training will be to ensure that all team members fully understand the aims and objectives of the audit and review processes; that they are acquainted with all the procedures involved; that they understand their own roles and tasks (including the importance of team coherence), the Agency's expectations of them and the rules of conduct governing the process; and that they have an opportunity to explore and practise the techniques of data assimilation and analysis, the development of programmes for visits, the construction and testing of hypotheses, the forming of judgements and statements of confidence, and the preparation of reports.
- 32 Institutional auditors will be recruited on the basis that they agree to undertake at least four audits over a period of two years. They may continue beyond two years by mutual agreement. Audit secretaries will be similarly recruited from the Agency's list of those with prior experience or who have expressed an interest in serving in this way.

The audit process

Preparation

- 33 The audit process will begin with a preliminary discussion between the institution and the Agency about the structure and content of the audit as a whole. This will be arranged about nine months before the audit visit. The purpose of this meeting will be to clarify the scope of the exercise; to discuss the interactions between the institution, the Agency and the audit team; to ensure that the self-evaluation document (SED) will be well-matched to the process of audit; to discuss any matters relating to the information set; and to consider the basis for choosing discipline areas or themes for enquiry within the audit (although the final choice of disciplines or themes for the audit trails will not take place until the institutional SED has been received by the Agency). Thereafter, until the submission of the SED, the Agency will offer such advice and guidance on the process as it can, at the request of the institution.
- 34 During the preliminary meeting, the Agency will discuss with the institution any areas that are to be reviewed more fully than simply through the discipline audit trails (eg as voluntary reviews or through the application of any other criteria that might be decided - see Annex A). These will be identified by the Agency in consultation with the institution and a timetable agreed. These reviews will not normally be integrated chronologically with the main audit programme - the logistical implications for institutions and the Agency would make that difficult - but their findings will be followed-up by the institution and the Agency (if necessary) when they have been completed; and their reports will provide a major contribution to the discussions in the next audit. Other subjects for subsequent full review may be identified during, or in consequence of, the audit; the Agency will decide, following discussion with the institution, when and how these should take place.

Analysis of documentation

- 35 Institutions will be requested to submit their documentation no later than 13 weeks before the briefing visit (but see paragraph 59 below). On receipt, the Agency will distribute the documents to the audit team and analyse the information set, the self-evaluation and other documents, and will present a reasoned summary for use by the team during the audit. The team will be asked to consult (by email) and suggest discipline areas that might be chosen for the audit trails or themes for enquiry. There will be an expectation that these will be areas of which team members have a general academic understanding. In the light of the team's responses it will also arrange a short meeting with the institution to decide the trails. Representatives of students will also have an opportunity to give their views on the choice of audit trails through their discussions with the audit team during the briefing visit. In most cases there will be at least three or four discipline audit trails or thematic enquiries. The number, choice and focus of audit trails and themes for enquiry will take into account the availability of information derived from any recent internal and/or external quality assurance reviews. The particular circumstances of small or specialist institutions offering a limited number of disciplines will also be taken into account.
- 36 The consultation paper HEFCE 01/45 proposed that the discipline audit trails and thematic enquiries should cover some 10 per cent of each institution's higher education provision, as measured by student FTE numbers. Some consultation responses from HEIs queried this suggestion, believing 10 per cent to be too high - although the National Union of Students commented that 10 per cent should be the minimum reviewed. Ten per cent is not suggested as a rigid proportion which must be achieved in all cases, no more and no less. Rather, it is intended to provide a common expectation of the range of activity to be undertaken, to guide the discussions between the Agency and the HEI.

The briefing visit

37 The visit to the institution will take place in two parts. The first part, the briefing visit, will include meetings of the audit team with representatives of both the institution and students. This briefing visit will be held five weeks before the audit visit, and will last three days in all, of which two (maximum) will be on the institution's premises. During these meetings and in consultation with the institution, the team will gather any additional information it feels that it requires (written or oral) to clarify what it already has, will consider its detailed lines of enquiry for the audit visit, will propose a programme for that visit and will allocate particular responsibilities to individual members of the team. Auditors will indicate what illustrative documentation they would like to be available at the start of the audit visit. This will be limited to no more than is needed to inform the enquiries they will be undertaking. The briefing visit will also offer the institution an opportunity to bring the team up to date on developments and changes since the SED was submitted and to bring to the audit team's attention any other matters that it may wish to. During the briefing visit, representatives of the student body will also be invited to offer their perspective on the SED and any other relevant matters.

The audit visit

38 The audit visit will normally extend over five working days (ie Monday to Friday). While it will be for individual teams to decide on the programme for their visits, a visit might be expected typically to include:

- opportunities for the team to read documents relating to internal reviews, external examiners' reports, and to see illustrative examples of assessed students' work in the course of the discipline audit trails;
- exploration of the relationship between institutional procedures and their operation at the programme or discipline level, giving special attention to the effectiveness of internal reviews of programmes and awards;
- exploration of the chosen discipline audit trails and/or chosen thematic enquiries, including targeted discussions in relevant departments or similar units;
- exploration of the way in which the institution is assimilating *The framework for higher education qualifications* (FHEQ) and the *Code of practice*;
- exploration of aspects of the provision of information to potential students and others;
- discussions between the auditors and staff of the institution about particular aspects of the institution's approach to internal quality assurance structures and mechanisms;
- discussions with staff and students separately on aspects of the accuracy, completeness and reliability of the information published about the quality of relevant programmes and standards of awards, including programme specifications;
- discussions with staff and students separately about the claims for the programmes and actual achievements of the students. These discussions would involve not only the academic outcomes of programmes, but also the ways in which students are treated and their opportunities to learn are optimised;
- follow-up discussions with the institution about any matters that had emerged from the audit trails.

The final day of the audit visit might include meetings with the institution and the relevant audit trail departments or discipline areas to tie up any loose ends. The team would then spend the rest of the day going over its findings at both the discipline and institutional levels in order to:

- decide on the levels of confidence that it believed could be placed in the institution's safeguarding of quality and standards and on the reliability of the information published by it;
- identify for itself areas of particular strength in the delivery of teaching and the facilitation of learning, or the management of quality and standards;
- identify any discipline or thematic areas about which it considered it had inadequate information or sufficient misgivings for it not to be able to give a clean bill of health to the discipline or thematic area at that time and where it wished to propose further or fuller scrutiny; and
- agree recommendations, categorised in terms of importance and urgency.

39 There will be no immediate oral report to the institution at the end of the visit, but a 'key themes' letter will be sent to it during the following two weeks, outlining the main findings and likely recommendations in the draft report.

Reports

- 40 The draft report will be prepared and submitted to the institution as soon as possible following the audit visit, normally within eight weeks; its production will be co-ordinated by the Assistant Director who is looking after the audit as a whole. Its format should follow a predetermined template (which will be discussed with the higher education sector and other users) and it should aim to provide information of use to both a lay and professional readership. The whole report will be published. But it will include a summary intended for the public, especially potential students, which will also be available separately from the rest of the report.
- 41 The draft report will be submitted to the institution with a request for corrections of errors of fact. A final report will be prepared in the light of the institution's response and will be published. There will be an opportunity for an institution to provide a brief statement to be appended to the report bringing its position up to date following the audit, particularly in respect of actions taken or proposed to address areas for improvement identified by the review team. If and when the Agency's resources permit, an opportunity might also be made available for an institution to provide further updating statements to be added to the report on the Agency's web site during the period until the next audit.
- 42 The report will set out the team's conclusions in respect of the areas identified in paragraph 17 above. It will include a description of which discipline audit trails or thematic enquiries were selected for inclusion in the audit; and the findings and conclusions derived from each of those trails or enquiries. These will not be graded or ranked. But the report will state whether each trail or enquiry found adequate evidence that the institution's quality management procedures were operating as claimed and intended, and thereby whether the academic standards and quality in the areas trailed or enquired into were meeting the institution's own, and in turn national, expectations and requirements - see also paragraphs 55 - 58 below.
- 43 If an audit team requests a second opinion from specialist advisers in the relevant discipline (see paragraphs 51 and 52 below), the Agency will defer submission to the institution of a draft report until the team has had an opportunity to decide what consequential changes it might wish to make to the text in the light of the advisers' comments.
- 44 Complaints and appeals procedures will be developed by the Agency, drawing on existing procedures where relevant.

'Sign-off' and follow-up

- 45 The audit will be completed when it is formally 'signed off'. Where the audit report offers positive statements of confidence and no recommendations identifying matters of importance requiring urgent attention, the audit will be formally 'signed off' on publication. A brief enquiry will be made by the Agency through correspondence with the institution after one year on the way the institution has responded to the report and to any recommendations. Institutions will also be asked, after three years, to discuss with the Agency progress on developments in quality assurance since the audit and to outline the institution's intentions for further work in the three years leading up to the next audit. This will also provide an opportunity for the Agency to read the internal review reports that have been produced since the previous audit. Only if the Agency has cause for concern in the light of what it has seen and heard will any further activity be proposed.
- 46 Where statements of confidence are qualified or recommendations in the report suggest there are important weaknesses to attend to urgently, the report will be published, but there will be a programme of follow-up action. The Agency will require an action plan from the institution and will request progress reports at regular intervals. As happens now in respect of subject review, in the extreme cases where subject provision is found to be so unsatisfactory as to be failing, the Agency will revisit within a year to ensure that the necessary improvement action has been taken. The revisit procedure adopted in these circumstances will be the same as described in the *Handbook for academic review*. If on revisit the provision were still found to be failing, the HEFCE would expect to withdraw funding and the programmes would close. In cases where the provision was not failing, but nonetheless required substantial improvement, the expectation is that the action plan would be drawn up and submitted to the Agency within three months of the institution being notified of the problem; with quarterly progress reports thereafter. The audit will not be finally 'signed off' until the institution indicates that the action plan has been completed and implemented successfully, with a maximum time limit of 18 months. If at that point there remain concerns about the effectiveness of the remedial action, the Agency will conduct a further visit; and if satisfactory progress has still not been made, the HEFCE reserves the right to withdraw funding.

Discipline audit trails and thematic enquiries

- 47 The discipline audit trails are a central part of institutional audit. They have three principal purposes:
- they provide verification that the institution's mechanisms and structures for the assurance of quality and standards are, in practice, operating in the manner intended and are indeed affording the assurance claimed;
 - they provide a window through which an audit can consider what is actually being achieved by students (academic standards) and the effectiveness of the teaching and other forms of support for student learning (quality standards);
 - they are also one direct way of comparing the claims made by institutions for the information provided about quality and standards, with the experience of students and others who have actually used it.

Selection of discipline audit trails

- 48 Discipline audit trails are a way of sampling what actually happens at the point at which academic and quality standards are determined and achieved. The number of trails followed will depend on how far an audit team feels that it needs additional evidence (over and above documentary evidence, see paragraph 26) to satisfy itself that its judgements and recommendations are soundly based. It will also depend on the resources available to the Agency. Typically there might be between four and six audit trails during an institutional audit. In deciding the number of trails, audit teams will bear in mind the suggestion in HEFCE 01/45 that 10 per cent of the student body should be covered by departments (or other organisational units) that are subject to this discipline-level enquiry - see also paragraph 17 above. They will, however, also need to take into consideration the importance of ensuring that the particular interests of students who are in areas of small provision are not overlooked.
- 49 There are a number of ways in which discipline areas for audit trails might be selected. They might be chosen because:
- the SED was inadequate or unclear about particular parts of the quality assurance arrangements at either institutional or discipline level;
 - a particular discipline appeared to offer particularly interesting or innovative features;
 - there was indication in the documentation (including past external quality assurance reports) of a possible or identified weakness at the institutional or discipline levels;
 - a particular discipline offered a recent illustration at discipline level of institutional processes for assuring the quality of programmes and the standards of awards;
 - student representatives identified that discipline, during the briefing visit, as raising particular issues worthy of more detailed examination.
- 50 There is, in addition, a strong case for random selection of a discipline in order to see how far it is operating within the parameters of quality assurance established by the institution, and to give the audit team the chance to see 'typical' practice.

Operation of audit trails

- 51 Individual discipline audit trails will be interspersed with more general enquiries during the course of the audit visit and will normally involve two auditors, at least one of whom will have an understanding of the general academic area involved. There will be six elements in a discipline audit trail:
- preparation of a **short self-evaluation document** which will be available to the audit team before the briefing visit. A recent internal report on the review of a discipline (or similar) might well be sufficient for this purpose;
 - provision of a **limited amount of illustrative documentation** to inform the auditors' discussions. This will not be requested until after the briefing meeting;
 - **discussions between members of the audit team and staff and students** about the ways in which the institution's quality assurance policies and practices are implemented and their perceived and actual effectiveness. This element will normally concentrate on a small number of specific topics identified by the team in the course of its preparation and briefing, but will also allow staff and students to raise their own concerns. It might also provide the opportunity to discuss practice with a small number of external participants in internal reviews;

- **examination of the basis of information about the quality and standards of programmes provided to potential students, employers and other stakeholders.** This will involve discussions with staff and students about (amongst other things) the completeness, accuracy and usefulness of the programme specifications;
 - **scrutiny**, in which the quality and standards of teaching and learning will themselves be discussed, and with some reference to primary evidence, of the relationship between the programmes being offered and *The framework for higher education qualifications*, relevant *Subject benchmark statements*, relevant sections of the *Code of practice* and the information produced by external examiners. It might be appropriate to invite a small number of the institution's external examiners to participate in this element, and/or one or more of the external peers who have taken part in recent internal reviews of programmes or departments organised by the HEI;
 - The forming of **judgements** about the extent to which the institution's quality assurance arrangements are in practice operating, at the level of programme delivery, in a way which ensures acceptable quality and standards of teaching and learning. The normal expectation will be that the evidence seen by the audit team will confirm the findings of internal reviews. If, however, the audit team considers either that the evidence it has seen suggests that the quality and/or standards give cause for concern, or that it is unable to interpret the evidence satisfactorily, it may seek advice from specialists in the relevant discipline. In these circumstances a team of two specialist advisers will be asked to visit the discipline area as soon as possible and provide a second opinion on the relevant matters. In the meantime the drafting of the audit report will proceed, but will not be submitted to the institution until the report of the advisers has been considered by the team and any consequential modifications have been made to the report.
- 52 This approach is designed to reflect the concerns and questions raised in the consultation responses about the exact purpose and operation of the subject specialist element. It reflects an assumption that it is not necessary to have detailed specialist subject expertise in order to form robust and valid judgements on all of those matters listed in paragraph 23. It also reflects the Agency's judgement that severe operational difficulties could be caused by a requirement to include discipline specialists in all cases. Instead, the presumption is that it is sufficient for the auditors to have a broad understanding of the subject area in which they are conducting discipline audit trails, because in the main the judgements they are making are generic, relating to the characteristics of, and the conditions and practices necessary for, effective learning and teaching in higher education irrespective of discipline specialism. However, it is recognised that any adverse findings might be challenged on the basis that the reviewers did not have the depth of expertise to understand fully what they were reviewing. Consequently, the audit team itself will not, without discipline specialist advice, recommend that a full subject review be undertaken. Such a recommendation will only be made following confirmation by discipline specialist advisers. Where specialist advisers are brought in on the grounds of possible shortcomings in the effectiveness of the facilitation of student learning, they will be expected to scrutinise directly the interaction between academic staff and students.

Thematic enquiries

- 53 If an audit team decides that there is a particular aspect of an institution's handling of quality and standards that is particularly interesting or which needs to be checked across a number of disciplines, it might undertake a thematic enquiry. This could, for example, relate to the use of external examiners or PSB reports, student complaints and appeals procedures, the internal review process itself, students with disabilities, practices relating to student assessment, or career information, education and guidance. (This list is illustrative, not exhaustive.) Evidence in respect of thematic enquiries may be obtained through disciplinary audit trails, information coming from all the disciplines being trailed.

Reporting of audit trails/thematic enquiries

- 54 The findings of audit trails or thematic enquiries will be incorporated within the main audit report, and there will be specific comment on them, including a statement of how far it has been demonstrated (eg through the discipline audit trails) that the quality and standards achieved by students meet the institution's own expectations and requirements, and how far these in turn appear to meet national expectations and requirements. In part this will be achieved by reference to the published information requirements published by the Information Task Group. Examples of good practice will be highlighted. If the audit trail suggests the need for further scrutiny of the area concerned, discipline specialist advisers will be asked for a second opinion, as described above. If, in the light of their advice, it is decided to recommend a full subject review, this will be conducted separately in accordance with the arrangements for full subject review.

Use of reference points

- 55 Institutional audit teams will use *The framework for higher education qualifications* (FHEQ), the *Subject benchmark statements*, and the Agency's *Code of practice* as external reference points when considering an institution's management of its quality and standards. They will not do so in a mechanistic way, or look for unthinking compliance with the detail of these structural underpinnings to UK higher education. Teams will be looking for evidence that institutions have carefully considered the purpose and intentions of the *framework*, *Subject benchmark statements* and *Code*, reflected on their institutional practices in the relevant areas, and have taken, or are taking, any necessary steps to ensure that appropriate changes are being introduced.
- 56 So far as the FHEQ is concerned, institutional audit teams will wish to look at the procedures adopted in the institution for relating their programmes and awards to the appropriate level of the FHEQ, and will use the discipline audit trails for more detailed information about this.
- 57 Institutional audit will not be asking institutions about their adherence to the *Code of practice* on a precept by precept basis. It will expect to see, in the SED, a statement about how the institution has addressed the intentions of the precepts, including any resulting changes to its practices, and will discuss any areas of difficulty that the institution has experienced. The team may request some evidence in support of the institution's statement, for verification purposes. This may, on occasion, be done during the course of discipline audit trails
- 58 Audit teams will also enquire into the way in which any relevant *Subject benchmark statements* have been taken into account when establishing or reviewing programmes and awards, and again will look at these in the course of the discipline audit trails. But it must be emphasised that the Agency does not view *Subject benchmark statements* as constituting definitive regulatory criteria for individual programmes or awards. They remain no more than statements of what the relevant academic communities consider to be valid frames of reference within which an honours degree in a discipline should be offered. They need to be used with particular care in interdisciplinary or multidisciplinary contexts, where simple or general application may be inappropriate. They do, however, provide authoritative reference points, which students and other interested parties will expect both to be taken into account when programmes are designed and reviewed, and to be reflected, as appropriate, in programme specifications.

Timetable for individual institutional audits

- 59 Because of the complexities of identifying areas for discipline audit trails and for any consequent fuller selective subject reviews, the timetable for individual institutional audits presents some difficulties. On the one hand institutions will require sufficient notice of an audit to enable a proper job to be done on the preparation of the SED, and this suggests an extended timescale for the whole process. Similarly, the Agency will not wish to make a final decision on precisely which disciplines or themes should be 'trailed' until it has had sight of all the relevant documentation. On the other hand, it is important that the SED should not be seriously out of date when the audit visit takes place. Much will depend on the views of institutions on the need for a long lead time to prepare the SED. At present it is suggested that the preliminary meeting be held some nine months before the audit visit; the SED and other documentation be submitted 18 weeks before the audit visit; and the briefing visit be held five weeks before the audit visit. The timing of the visits will, of course, have to take account of the availability of the audit team, and the unavailability of students during vacations.
- 60 The schedule following the audit visit envisages 22 weeks until publication of the final report, which allows time for the institution to respond to the draft report. This may need to be extended if advice is sought from discipline specialists, especially if the audit visit takes place near the end of a term or semester.

Administration of the process

- 61 The Agency will administer the audit process in accordance with published operational guidance. Audit documentation will be received and analysed in the first instance by a dedicated Information Unit within the Agency, and audit teams will be briefed on each institution. An Assistant Director in the Agency will have responsibility for the management of each audit.
- 62 Every effort will be made by the Agency to ensure that a close and constructive working relationship is established with institutions and that this is actively maintained beyond the specific requirements of the institutional audit and related subject reviews. Named correspondents will be sought from institutions to liaise with designated staff of the Agency on a continuing basis.

- 63 The audit's judgements, including any recommendations and the statements about levels of confidence, will be decided by the audit team. The co-ordinating Assistant Director will ensure that all judgements are backed by adequate and identifiable evidence, and that the audit report provides information in a succinct and readily accessible form. To this end the Agency will retain editorial responsibility for the final text of the report.
- 64 The Agency will endeavour to protect the quality of the process itself by the development and implementation of explicit service standards.

Reduction in burden

- 65 The move to an audit-based process for the external quality assurance of higher education has in large measure been prompted by general recognition, in Government and HEFCE, as well as by institutions and their representative bodies, of the need to reduce the burden of accountability on institutions. The single process described in this document will, for many institutions, replace the multiplicity of audit and subject reviews that has been characteristic of the current and previous external quality assurance regimes.

Timetable for implementation

- 66 Given the number of preparatory tasks that need to be undertaken before the first audit starts, the expectation in HEFCE 01/45 that the new process would be up and running by September 2002 is unlikely to be achieved without a serious risk to its successful implementation. Because of this it is now proposed that the first audit visits should not take place before February of 2003. This will allow the necessary preliminary work to be done in the autumn of 2002 in the first institutions to be audited.
- 67 The Agency intends to produce a new draft handbook in April 2002 and will consult institutions and others on it. At about the same time it will propose each institution's place in the first three-year cycle of audits. The institutions to be audited during 2002-3 will be allocated their Agency review contact, and the preliminary discussions will take place with them. During May and June additional auditors will be recruited; their training will be provided during the summer and autumn of 2002.

Conclusion

- 68 The outline presented above has been designed as an integrated process that pays due attention to academic quality and standards at the point of delivery as well as to institutions' ultimate responsibility for what is done in their names and by virtue of their formal powers. It has as a major feature a recognition that students and other stakeholders need valid, reliable and up to date information about quality and standards at the level of the programme, where it really matters, and that only the institutions are in a position to provide this.
- 69 Methodologically it builds upon accepted and widely used practice and is a practicable proposition. It is capable of coarse or fine tuning and will reduce the overall burden on institutions created by external scrutiny. In style it attempts to balance the need for publicly credible, independent and rigorous scrutiny with the advantages of a constructive and non-adversarial relationship with those being audited. It does, however, depend critically on the robustness and effectiveness of institutions' own internal quality assurance and in particular in their procedures for monitoring both programmes and student assessment. It represents a major evolutionary step in the external quality assurance of higher education in the UK and brings much closer the possibility of a reliable process in which outside intervention in an institution's activities really is in direct relation to risk.

Annex A

Arrangements during the transitional period 2002-2005

- 1 The institutional audits described earlier in this document will be introduced progressively from the academic year 2002-03 onwards. All institutions in England will have had an audit by the end of 2005. The HEFCE has indicated its requirement that, during the transitional period 2002-03 and 2003-04, those institutions that are still awaiting their first audit (for this purpose, the year in which an audit takes place is excluded from the calculation) should have some interactions with the Agency at the level of the discipline.
- 2 For most institutions the purpose of such interactions will be to provide a developmental opportunity to test their own internal procedures against the demands of the forthcoming audits. The nature of those interactions should therefore apply, so far as possible, the same principles and methods as will apply for institutional audit. This will take the form described in paragraphs 6-8. For a small number of institutions, however, those that meet the criteria listed in paragraph 4, subject level interactions will take the form of subject reviews, using the method described in the Agency's *Handbook for academic review 2000*. It follows from this that the programme of subject reviews previously proposed by QAA for individual institutions from 2002 onwards will not now take place. A schedule of institutional audit and subject reviews or discipline engagements will be agreed with each institution.

Subject review

- 3 From 2005, when all institutions will have had an institutional audit, full subject reviews will only be carried out where there is serious cause for concern about quality and/or standards. The only exceptions to this rule are stated in paragraph 5 below. Normally, an institutional audit will be the source of information and judgements that will trigger such reviews.
- 4 Between 2002 and 2005, however, subject reviews will also be carried out in institutions that, under the 1995-2001 subject review programme, received either two or more subject reviews with the profile totalling 17 points or fewer or two or more profiles containing two or more Grades 2. In these institutions, the provision that is eligible for review will be:
 - subject areas not previously reviewed, from which at least one complete cohort has graduated;
 - subject areas which, under the teaching quality review method applying prior to 1995, received a 'satisfactory' judgement from the HEFCE, but were not visited;
 - all subject areas which received three or more Grades 2 in the post-1995 review programme; it is not the intention to revisit any subject areas which received a Grade 1 in the post-1995 review programme, because they have already been revisited and action has been taken to either improve or close the programmes concerned.
- 5 There are two exceptions to the rule stated in paragraph 3 above. Subject review may apply in cases other than those described above where:
 - the institution requests one or more full subject reviews for its own purposes. For example, it may be that an institution seeking degree awarding powers or university title might wish to have the fullest possible external evidence of high quality and standards, and therefore take the initiative to request the subject review method. It should be noted, however, that the method adopted for any such reviews will be that described in QAA's *Handbook for academic review 2000* and will therefore not be an opportunity for a revision of the graded profile scores obtained under the earlier subject review method;
 - the relevant Professional, Statutory or Regulatory Body requires that the subject review method be used as a basis for its decisions about accreditation. That is a matter for the PSB concerned to decide.

Programme of developmental engagements

- 6 For the institutions that do not have subject reviews under the terms of paragraphs 3-5 above, and which are not audited in 2002-2003, there will be a limited programme of developmental discipline-level engagements. All these institutions will be expected to have at least one engagement in each of the years before they have their institutional audit. The criteria governing the selection of areas for the engagements will mean that their number will vary from institution to institution, but in no case will exceed four during the transitional period.

- 7 Institutions that do not have subject reviews will have discipline-level engagements in respect of:
- discipline areas not previously reviewed, from which at least one complete cohort has graduated; and
 - discipline areas which, under the teaching quality assessment review method applying prior to 1995, were included in subjects that received a 'satisfactory' judgement from HEFCE, but were not visited.
- 8 It is not intended that all discipline areas that are eligible for an engagement under these criteria should have one: 40 to 50 per cent of the eligible areas will be the usual expectation. But all institutions will be expected to have at least one such engagement in each relevant year. Where no discipline can be identified that meets either of the two criteria above, the discipline will be chosen by the Agency in consultation with the institution.

The method

- 9 The main purpose of these engagements is to provide an opportunity for institutions to test, in co-operation with the Agency, the strength of their internal procedures and the robustness of the evidence they use, and to demonstrate a method which might be transferable, in full or in part, for use in internal reviews. They will employ a standardised method, derived so far as possible from the principles and methods which will be adopted in the audit trails that will accompany future institutional audits. It is intended that the engagements should be undertaken by teams comprising an Agency auditor, one or two subject specialists and an internal (institutional) nominee. The disciplines to be scrutinised will be agreed during the course of preliminary discussions between the Agency and the institution. Using the new JACS subject coding for reference, a group of programmes offered at different levels will be identified for each engagement. The Agency's 42 subject groups will not be used for this purpose.
- 10 The overall pattern of review will comprise a period of preparation by the team, using a short self-evaluation document prepared by the institution as the main source of information. This requirement for an SED at discipline level will also apply in the institutional audit method, (see paragraph 51, bullet 1 of the Operational Description), and will be one of the common elements between the discipline engagements and the audits. That will be followed by a two-day visit (or two single days) to the institution. The self-evaluation will be expected to follow the broad format dictated by the generic issues identified below, but no word limits will be imposed and the content will be left largely to the institution. It is likely that programme specifications appended to the self-evaluation document will be able to cover much of the relevant material.
- 11 The visit(s) to the institution will initially involve discussions about general matters relating to quality and standards of learning and teaching between the team and the discipline staff, and between the team and a representative group of students. Further scrutiny and discussion will concentrate on specific issues derived from the self-evaluation and its analysis, and from issues identified during the initial discussions. As with discipline audit trails in institutional audits, the focus will be on the institution's own procedures for setting, monitoring and improving the quality and standards of learning and teaching, with an emphasis on the outcomes - the quality of programmes as experienced by students and the standards they achieve. This is another key area of commonality between the discipline engagements and subsequent institutional audits.
- 12 At the end of the process, the team will make two threshold-based judgements, expressing 'confidence' or otherwise in the academic standards set and achieved and in the quality of the learning opportunities. The team will be expected to produce a report of no more than 2000 words, which will be submitted to the institution and the HEFCE. Reports of the engagements will not be published. But the findings will be used as part of the evidence base which informs the subsequent institutional audit. The process will, so far as possible, reflect the principles which will apply to institutional audit and discipline audit trails, in order that they can be used developmentally during the interim period before the HEIs' first full institutional audit visit. If the engagements described above find evidence of cause for concern, however, a full subject review will normally be proposed.

The issues for scrutiny

- 13 Discipline engagements will focus on the academic standards set by the subject provider, their achievement by students, and the quality of the academic programmes offered. The method used will concentrate on generic matters related to both standards and quality:
- the broad aims of the provision;
 - the intended learning outcomes (promoting the aims);
 - the curricular design and content (encouraging achievement of the intended outcomes);
 - the teaching and learning (delivering the curricula);
 - the learning resources (promoting learning);
 - the assessment, progression and achievements of students;
 - the enhancement of quality and standards.
- 14 Using the issues outlined above, and the self-evaluation document as the prime source of information, the team will set about evaluating the programmes agreed for the engagement. Such evaluation will be in terms of general judgements rather than very detailed scrutiny, and will use additional documentary sources, particularly external examiners' reports, student and/or programme handbooks and other curricular documents, and samples of student work for reference and evidential purposes. Where such documents are not available, or their form or content do not allow a satisfactory evaluation to be made, or where there are other causes for concern, the team will report such matters to the Agency. A decision as to whether a full subject review is needed will then be made.

Documentation

- 15 A review method such as that proposed, which relies on internal self-evaluation and focused activity by an external team, places a considerable responsibility on institutional staff for the provision of evidence. This principle is fundamental both to institutional audit and to the discipline engagements. The self-evaluation document, with programme specifications appended, will be central to the process of review, and will be needed by the team for their preparatory work. The Agency will provide its team with 'academic infrastructure' documents, such as *Subject benchmark statements*, *qualifications frameworks*, and its *Code of practice*. These documents will have the same status in discipline engagements as they have for institutional audit - ie as a set of reference points, not prescriptive blueprints (see paragraphs 55 - 58 of the operational description). Other institutional documents which the team might wish to see could include:
- programme approval (validation) and review reports;
 - programme or subject handbooks;
 - learner support material, including module or unit guides;
 - student handbooks;
 - records of staff/student liaison committees, or equivalent;
 - assessment criteria and guidance to markers;
 - samples of students' work;
 - examination board minutes;
 - external examiners' reports (last three years);
 - student feedback summaries;
 - recruitment and progression data, including into employment;
 - staff development documents relating to the provision;
 - PSB accreditation reports, if relevant.
16. There will be no requirement for a base-room, as all these documents should be to hand within institutions. The team will request documents only when required. Institutions may wish to consider granting electronic access to records (eg through its intranet) to the team.
17. Further operational details of the proposed discipline engagements will be contained in the draft handbook on which institutions will be invited to comment in due course.



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