



QAA

A stylized, green-tinted illustration of a hand holding a pen and writing on a document. The document has a grid pattern and some text, including the word 'Self-Evaluation' visible in the background. The overall image is semi-transparent and serves as a background for the title.

Self-Evaluation

February 2008

External Review for Confirmation of Full Membership
of the European Association for Quality Assurance in
Higher Education (ENQA)

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Foreword

The Quality Assurance Agency for Higher Education (QAA) was established in 1997 to provide an integrated quality assurance service for all providers of higher education in the United Kingdom (UK). As part of its broader mission it has also committed itself to the promotion of good practice in quality assurance in Europe and elsewhere in the world. To this end it (and its predecessor bodies) have played an active and leading role in all the major European higher education quality assurance developments, from the European Pilot Project of 1994-95 to the establishment of the European Network for Quality Assurance (ENQA) in 1999, the Network's transformation into an Association in 2004, the drafting of the European Standards and Guidelines for Quality Assurance in higher education (ESG) (2005) and the subsequent work towards the creation of a register of European quality assurance agencies (2007 onwards).

QAA now wishes to gain confirmation that it is operating in accordance with the ESG, in order to apply for a continuation of its full membership of ENQA. It has therefore opted to submit itself to a 'type A' external review, as defined by ENQA in its *Guidelines for national reviews of ENQA member agencies*¹, the purpose of which is limited to an examination of the extent of QAA's compliance with the European Standards and Guidelines.

As QAA is an independent, not for profit organisation, it is not owned by or formally accountable to governmental authorities in the UK. It does, however, have a large range of stakeholders, all of which have an interest in ensuring that QAA is meeting its international objectives and responsibilities. One of these is to follow European best practice, as defined in the ESG.

In deciding how to commission an independent external review, QAA has asked one of its principal stakeholders, the Higher Education Funding Council for England (HEFCE), to convene a steering group of all those stakeholders to which QAA is accountable, formally or informally. This steering group has taken upon itself the task of coordinating and managing the review, appointing the review team and ensuring that the entire process is conducted in accordance with ENQA's *Guidelines for national reviews of ENQA member agencies*. QAA is grateful both to HEFCE and its partner stakeholders, and to the members of the review team, for their willingness to undertake this task.

¹ *Guidelines for national reviews of ENQA member agencies*, ENQA, 2006

This self-evaluation has been structured with the ESG specifically in mind and is designed to facilitate the review team's understanding of the level of QAA's compliance with the ESG. Given the broad range of activities that QAA undertakes within UK higher education, many of which are beyond the terms of reference of the ESG, this has not been a simple exercise. While we are confident that the review will demonstrate our full adherence to the ESG in our main review activities, we must also point out that some of our work demands innovative and responsive approaches which are determined by their need to be fit for their own particular purpose, rather than a narrower conformity with the ESG.

We hope that this self-evaluation, together with the associated submitted documents and discussions that we look forward to having with the review team, will provide sufficient information to enable confirmation that QAA complies substantially with the ESG and is therefore eligible to continue as a full member of ENQA.

Peter Williams
Chief Executive

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Introduction to the work of QAA

The higher education system in the United Kingdom

The size and shape of the system

1 The higher education system in the UK is complex and has a number of characteristics not generally encountered elsewhere in Europe. First, there are actually four systems, one for each of the administrative jurisdictions of the UK: England; Scotland; Wales; and Northern Ireland. The similarities amongst the four are greater than their differences, so it is possible to speak of a 'UK higher education system': but the differences are nonetheless marked and are becoming more so. In particular, Scotland, which has always had a separate education system, has adopted a distinctive approach to the organisation of education at all levels, and, for example, uses a credit and qualifications framework covering all levels of activity from secondary to higher education. Wales is moving in a similar direction, while in England, although there is also progress, the separate nature of higher education from other levels remains more accentuated.

2 There are over 160 autonomous universities and colleges of higher education in the UK. These institutions undertake a diverse range of activity, have varied histories and missions, and operate responsively and competitively in a climate of rapid change. Their student numbers range from 120 to 200,000. Most institutions provide programmes in a number of subject areas while others, such as art colleges or music conservatoires, specialise in one area. In all there are about 2.4 million students in the UK, of whom about 12 per cent are from other countries. In addition, an unknown (but considerable) number are also studying for the degrees and other qualifications of UK higher education institutions (HEIs) in locations outside the UK.

3 In all four countries of the UK, HEIs are independent, autonomous organisations, with their own legal identities and powers, both academic and managerial. They are not owned by the state, although most are dependent to a greater or lesser extent on state financing, and are free to offer such programmes and awards as they wish, subject to the status of their awarding powers. Each university and college of higher education is responsible for ensuring that appropriate standards are being achieved and a good quality education is being offered. Publicly recognised HEIs fall into six categories:

- universities with powers to award taught and research degrees
- universities with powers to award taught degrees

- university colleges with powers to award taught degrees
- colleges of higher education with powers to award taught degrees
- other institutions with powers to award taught and/or research degrees
- colleges of higher education offering programmes and awards validated by other institutions.

4 Further education colleges normally offer higher education programmes designed and approved directly by a degree awarding institution, under a formal recognition arrangement. They may, in addition, offer programmes leading to Higher National awards, which are qualifications of a national awarding body. There are also many private providers of education, a very small number of which have powers to award degrees: most, however, are linked in one way or another to universities through, for example, franchise or validation arrangements.

Degree awarding powers and university title

5 As indicated in the preceding section, different HEIs have different levels of autonomy in respect of their legal right to award degrees.

6 The power to award degrees is regulated by law in the UK. It is an offence for an institution to purport to award, or to offer to award a UK degree, unless it is authorised to do so. Since 1992, universities have acquired their powers to award degrees from the Privy Council, a senior UK government committee, which acts on the advice of the responsible authorities in the four administrative jurisdictions. In turn the relevant government education departments seek the views of QAA on applications.

7 There are three types of degree covered by UK legislation: taught degrees (that is, degrees awarded following a course of instruction, not a programme of research); research degrees; and Foundation Degrees. Each type of degree has its own set of criteria against which applications are assessed by QAA. Research degree awarding powers (DAPs) are not granted unless the applicant already has taught DAPs. Other types of award, such as certificates and diplomas, are not generally regulated by law and may be granted by any organisation.

8 The use of the title of 'university' is also regulated by law. In England and Wales the title of university may be granted to any institution that has taught DAPs and 4,000 full-time equivalent students following higher education programmes. In Scotland and Northern Ireland, applicant institutions for university title are, in addition, required to hold research DAPs and to cover a range of subjects.

Finance

9 HEIs in the UK are private institutions. They are autonomous, they have intellectual and academic freedom, and do not have to follow a government-set curriculum.

10 However, nearly all receive public funding through the higher education funding councils. Separate councils exist for England, Scotland and Wales, and the Department for Employment and Learning (DEL) funds higher education in Northern Ireland. Universities and colleges in England are also funded through student tuition fees. Under the terms of the *1992 Further and Higher Education Act*, the funding councils have a statutory obligation to 'secure that provision is made for assessing the

quality of education provided in institutions for whose activities they provide, or are considering providing, financial support...'. This responsibility is discharged through annual contracts with QAA.

11 In 2005-06, universities and colleges had a total income of £19.5 billion. Of this, £7.6 billion came from the UK higher education funding bodies, £0.4 billion from other government sources, and £11.5 billion from non-government sources such as private fees, industry and charities.

Structure of programmes and awards

12 Although, as has already been noted, HEIs in the UK have a very high level of academic autonomy, they nonetheless function in similar ways and use a broadly common academic structure. This is a three-cycle framework, which conforms to the European Higher Education Area (EHEA) qualifications framework, although it has been in place for many decades (with bachelor's and master's degrees being the norm, indeed, for many centuries). The bachelor's degrees are of three or four years' duration for full-time students (three being more common in England, Wales and Northern Ireland for subjects other than modern languages and 'sandwich' courses that contain a work experience year). Master's degrees typically last for between one and two years, full-time. Doctorate programmes typically last for two or three years post master's.

13 National higher education qualifications frameworks (one for England, Wales and Northern Ireland (EWNI) and one for Scotland) have been in use since 2001². The Scottish framework was successfully self-certified against the Qualifications Framework of the EHEA in 2007 and the EWNI framework is undergoing the self-certification procedure during 2008, following a process of revision.

14 All parts of the UK use credit systems: while these differ in detail they are compatible with one another and with the European credit transfer and accumulation system (ECTS). The ECTS has not, however, been adopted by any part of the UK as the official credit system.

15 Further information about current degree structures in the UK is given in the European *Guide to The Diploma Supplement* statements published by the UK Europe Unit³.

The Academic Infrastructure

16 The QAA's Academic Infrastructure provides a basic way of describing the organisation of higher education qualifications and academic standards in UK higher education. It evolved from recommendations about quality and standards made in the reports of The National Committee of Inquiry into Higher Education and its Scottish Committee (Dearing and Garrick reports) in 1997⁴. Those reports identified confusion relating to the meaning of different higher education awards, the diversity of programmes with the same or similar names, and the need for useful information about the way that local autonomy can co-exist with national expectations about standards and quality.

² www.qaa.ac.uk/academicinfrastructure/FHEQ/EWNI/default.asp

³ www.europeunit.ac.uk/sites/europe_unit2/resources/Guide%20to%20the%20Diploma%20Supplement.pdf

⁴ www.leeds.ac.uk/educol/ncihe/

17 The Academic Infrastructure comprises the following four elements developed by QAA, working with the higher education sector. It allows for and encourages diversity and innovation within academic programmes.

- *A Code of practice for the assurance of academic quality and standards in higher education.*
- The frameworks for higher education qualifications in England, Wales and Northern Ireland, and in Scotland.
- Subject benchmark statements, which set out expectations about standards of degrees in a range of subject areas. They describe what gives a discipline its coherence and identity, and define what can be expected of a graduate in terms of the abilities and skills needed to develop understanding or competence in the subject.
- Programme specifications, consisting of definitive publicly available information on the aims, intended learning outcomes and expected learner achievements of programmes of study.

18 Although the Academic Infrastructure has no legal standing and is not mandatory, there is a consensus expectation that HEIs will take the elements into account in their management of the standards and quality of their programmes and awards. QAA judges the extent to which they meet this expectation.

Accreditation

19 Because UK HEIs are autonomous, neither they nor their programmes or awards are subject to state or government accreditation. The powers to award degrees can, in theory, be revoked, but this has never yet happened. Since the introduction in 2004 of new arrangements for granting DAPs, however, providers with taught DAPs that are not supported financially by public funding bodies are subject to the six-yearly renewal of their powers, following an audit by QAA. Similarly, the newly enacted law (October 2007) covering the granting of Foundation Degree awarding powers to further education colleges places additional limits on the exercise of those powers and again requires satisfactory reports from QAA to allow their continued use.

20 Some programmes of study in higher education may also lead to a professional or vocational qualification, for example in engineering, law, accountancy or medicine. Such programmes are subject to accreditation by the relevant professional or statutory body. This form of accreditation recognises that a programme provides some, or all, of the competencies needed for professional practice.

Quality assurance

21 The quality assurance of higher education in the UK exists at two levels, internal and external.

Internal quality assurance

22 The underlying principle of quality assurance in the UK is that responsibility for the standards and quality of academic awards and programmes rests with the HEIs themselves. Each has its own internal procedures for attaining appropriate standards

and assuring and enhancing the quality of its provision. In particular, institutions address their responsibilities for standards and quality through:

- their procedures for the design, approval, and the monitoring and review of programmes
- the assessment of students.

23 All institutions carry out both regular monitoring and periodic review of their programmes. Monitoring considers how effectively a programme achieves its stated aims and the success of students in attaining its intended learning outcomes. It is usually undertaken by the department providing the programme, and often involves a programme team (usually including students) appraising its own performance at the end of an academic year. The process will normally take into account reports from external examiners, staff and student feedback, reports from any professional body that accredits the programme and feedback from former students and their employers. It may result in adjustments to the curriculum or to student assessment, to ensure continued effectiveness.

24 Periodic review in institutions is carried out, typically, every five years and normally involves both students and external experts. It looks at whether the aims and intended learning outcomes set for a programme are still valid and are being achieved. Institutions also, generally, have in place arrangements for the periodic review of the various support services they provide to their students.

25 Each HEI appoints external examiners who report to the head of the institution. External examiners are independent academic experts drawn from other institutions, or from areas of relevant professional practice. They provide impartial advice on performance in relation to particular programmes. Institutions require their external examiners, in their expert judgement, to report on:

- whether the standards set are appropriate for the awards or award elements, by referring to subject benchmark statements, the frameworks for higher education qualifications, institutional programme specifications and other relevant matters
- the standards of student performance and the comparability of the standards with those of students following similar programmes in other UK HEIs
- the extent to which the processes for assessment, examination and the determination of awards are sound and have been conducted fairly.

External quality assurance

26 The underlying principle for external quality assurance in the UK is that it should provide public confidence that the HEIs are exercising their responsibilities for the academic standards and quality of their programmes and awards in a way that safeguards the interests of students and society more generally.

27 The main type of external quality assurance of higher education used in the UK is the institutional review, which is carried out by QAA. This takes a number of different detailed forms and names. In England and Northern Ireland it is called institutional audit, in Scotland enhancement-led institutional review (ELIR) and in Wales institutional review. While each of the review types has a different emphasis,

all have a similar fundamental function: to examine the internal quality assurance policies and processes and to assess and report publicly on the level of confidence that can be placed in them. Additionally, the opportunity is taken to recommend ways in which improvements might be made to the management of standards and quality.

Unistats

28 Beyond the formal requirements of quality assurance, HEIs also have a responsibility to publish accurate and up to date information about their academic standards and quality. This is now (since October 2007) provided through a website known as Unistats⁵, managed by UCAS, the national higher education admissions service, and commissioned by HEFCE, acting on behalf of the Higher Education Funding Council for Wales (HEFCW), DEL Northern Ireland and the Scottish Funding Council (SFC).

The structure and organisation of QAA

Official status

29 QAA is a private company limited by guarantee operating under the legal jurisdiction of England and a charity registered in both England and Scotland. The company's objects and constitution are set out in its Memorandum and Articles of Association. The company's members are: Universities Scotland, Universities UK (UUK), Higher Education Wales (HEW) and GuildHE Limited. It is a 'not for profit' company.

The QAA Board of Directors

30 QAA's Board of Directors has 15 members. Four members are appointed by the representative bodies of the heads of HEIs - HEW, GuildHE, UUK and Universities Scotland. Four members are appointed by HEFCE, HEFCW, SFC and DEL in Northern Ireland. The Board appoints seven independent members itself, including a student member. The Chairman of the Board is drawn from the independent members. All directors are non-executive and receive no remuneration from QAA. The only payments they receive are reimbursements of travel expenses incurred on QAA business. Directors retire from membership of the Board by rotation based on length of service. They are eligible to be reappointed on one occasion.

31 The Board has two observers, one representing relevant government departments and one representing the Higher Education Academy (HEA)⁶. Observers receive all Board papers and may participate in discussion, but may not take part in any decision-making procedures.

32 All new Board members are required to attend an induction session at QAA's offices in Gloucester. The induction session has four main purposes: understanding the nature of the organisation and its business; understanding the nature of the Board member's role; understanding QAA's main external relationships; and getting to know some of QAA's senior staff. New Board members are asked to evaluate the effectiveness of the induction arrangements. The arrangements are reviewed periodically by the Board's Nominations Committee.

⁵ www.unistats.com/

⁶ The HEA is an independent organisation in the UK that supports HEIs with strategies for the development of research and evaluation to improve the learning experience for students, www.heacademy.ac.uk/

Board responsibilities

33 The Board has adopted the following statement of its primary responsibilities and has included this statement in its *Code of best practice for members of the QAA Board (Code of best practice⁷)*:

- to approve the mission and strategic vision of QAA, strategic plans, annual operating plans and key performance indicators, and to ensure that these meet the interests of stakeholders
- to delegate authority to the Chief Executive for the corporate, financial, estate and personnel management of the organisation, and to establish and keep under regular review the strategies, policies, procedures and limits for such management functions
- to ensure the establishment and monitoring of systems of control and accountability, including financial and operational controls and risk management, and procedures for handling internal grievances, conflicts of interest and whistle-blowing
- to ensure processes are in place to monitor and evaluate the performance and effectiveness of QAA against the plans and approved key performance indicators, which should be, where possible and appropriate, benchmarked against other comparable organisations
- to establish processes to monitor and evaluate the performance and effectiveness of the Board itself
- to conduct its business in accordance with best practice in corporate governance and with the principles of public life drawn up by the Committee on Standards in Public Life, and in accordance with the duties and responsibilities of company directors and charity trustees
- to safeguard the good name and values of QAA
- to appoint the Chief Executive, and to put in place suitable arrangements for monitoring his/her performance
- to appoint the Company Secretary and to ensure that, if the person appointed has managerial responsibilities in the organisation, there is an appropriate separation in the lines of accountability
- to be the employing authority for all staff in QAA and to be responsible for establishing a human resources strategy
- to be the principal financial and business authority of the company, to ensure that proper books of account are kept, to approve the annual budget and financial statements, and to have overall responsibility for the company's assets, property and estate

⁷ www.qaa.ac.uk/aboutus/qaaBoard/boardcop.asp

- to be the company's legal authority and, as such, to ensure that systems are in place for meeting all its legal obligations, including those arising from contracts and other legal commitments made in the company's name
- to ensure that the company's constitution is followed at all times and that appropriate advice is available to enable this to happen.

Register of Board members' interests

34 The Register of Board members' interests is updated periodically. The Register includes the Chief Executive, the heads of QAA's operational groups, and the two observers (representing government departments and the HEA) who attend Board meetings, as well as the Board members themselves. It includes details of current employment, and connections with HEIs and other bodies, is reviewed annually and whenever there are changes in the Board's membership, and is available to the public on request.

Board committees

35 The Board has seven committees. They advise on governance matters (Audit Committee, Remuneration Committee and Nominations Committee), QAA business in Scotland (the QAA Scotland Committee) and Wales (the Advisory Committee for Wales), applications for the grant of DAP and university title (Advisory Committee on Degree Awarding Powers), and the management of the Access to Higher Education scheme in England, Wales and Northern Ireland (Access Recognition and Licensing Committee). The minutes of each committee are received by the Board. All committees operate under terms of reference and with membership determined by the Board.

36 Membership of the committees is updated in the light of retirements from, and appointments to, the Board. The membership and terms of reference of all Board committees are set out in the Board's *Code of best practice*.

The Chief Executive

37 The Chief Executive is appointed by the Board. He is responsible for the leadership, executive management and day-to-day direction of QAA's work, within the overall strategic direction that is set by the Board. He is accountable to the Board for the overall organisation, management and staffing of QAA and for procedures in financial and other matters, including staff conduct and discipline. This includes promoting by leadership and example the values embodied in the Committee on Standards in Public Life's seven principles of public life. The Chief Executive is accountable to the Board for the propriety and regularity of QAA's finances, for keeping proper accounts, for prudent and economical administration, and for the efficient and effective use of resources. He has a responsibility to see that appropriate advice is tendered to the Board on all these matters.

Objects

38 QAA's objects, as set out in its Memorandum and Articles of Association, are:

- the promotion and maintenance of quality and standards in higher education in the UK and elsewhere
- the enhancement of teaching and learning, and the identification and promotion of innovation and good practice in teaching and learning
- the provision of information and the publication of reports on quality and standards in higher education in the UK and elsewhere
- the provision of advice to governments, as requested, on access course recognition and in relation to all or any of the above objects.

Mission and purposes

39 QAA's mission is to safeguard the public interest in sound standards of higher education qualifications and to inform and encourage continuous improvement in the management of the quality of higher education.

40 To achieve its mission, QAA works in partnership with the providers and funders of higher education, the staff and students in higher education, employers and other stakeholders, to:

- safeguard the student and wider public interest in the maintenance of standards of academic awards and the quality of higher education
- communicate information on academic standards and quality to inform student choice and employer understanding, and to underpin public policy making
- enhance the assurance and management of standards and quality in higher education and promote a wider understanding of the value of well-assured standards and quality
- promote a wider understanding of the nature of standards and quality in higher education, including maintenance of common reference points, drawing on UK, other European, and international practice.

Strategies

41 QAA is a UK-wide body and has a wide range of partners, stakeholders and users of its services - universities and colleges, students, professional and statutory bodies, other public bodies, employers, funding bodies, government departments and the general public. It has a correspondingly wide range of strategies and approaches to satisfy that diversity:

- reviews and audits of the standards and quality of higher education across the UK, including higher education provision offered collaboratively between UK HEIs and partners, whether in the UK or overseas
- publication of reports arising from those reviews and audits

- commentary on the accuracy of the public information that institutions make available about the standards and quality of their provision
- development, maintenance and promotion of the Academic Infrastructure - qualifications frameworks, subject benchmark statements, the *Code of practice for the assurance of academic quality and standards in higher education* (the *Code of practice*), programme specifications.

42 In 2005 QAA published its second strategic plan, for 2006-11⁸. This identified five strategic themes and nine strategic goals as follows:

Strategic themes

- safeguarding standards
- supporting and enhancing quality
- offering expertise
- rationalising regulation
- working worldwide.

Strategic goals

- continued and justified public confidence in the standards and quality of UK higher education
- external standards and quality assurance frameworks in the different parts of the UK that are proportionate to risk and responsive to change and development
- support for institutions in their management and enhancement of quality and standards
- better understanding in universities and higher education colleges of standards and quality assurance developments in Europe and elsewhere
- rationalisation of the 'regulation burden' on universities and higher education colleges
- publication of a wider range of intelligence-based materials to support institutional improvement
- stronger engagement with the full range of higher education's stakeholders, publication of a differentiated range of information to meet the needs of students, employers and the general public diversification in QAA's client base and range of services.

⁸ www.qaa.ac.uk/aboutus/strategicPlan/2006/Strategicplan06-11.pdf

43 The Strategic Plan also contains a list of QAA's own values and standards, as follows:

Values

44 QAA's work is underpinned by core values.

The importance of higher education

45 QAA acknowledges the academic vocation and the importance of higher education in the lives of citizens. We respect the diversity and autonomy of higher education providers, and value the high regard in which UK higher education is held internationally.

The entitlements of learners

46 Students are entitled to a higher education that has value, with academic standards that reflect national expectations and awards that meet published specifications; and to fair and equitable treatment in all aspects of their studies. QAA values the participation of students in the assurance of academic standards and quality.

The significance of the responsibilities of the providers of higher education

47 The providers of higher education have the primary responsibility for protecting academic standards and quality; QAA works with them to meet that responsibility. We depend on help from many colleagues in higher education and the professions who work with us, and we value their contribution to our peer processes.

The validity of the public interest in higher education

48 The public invests a lot in higher education. It has a legitimate expectation that the standards of higher education qualifications are maintained and that the quality of provision supports learners to achieve the necessary standards.

Standards

49 QAA sets itself high standards in all its work.

Integrity

50 We aim to show impartiality, fairness, independence and honesty in our work and to base our judgements on evidence.

Professionalism

51 We aim to achieve high professional standards and provide a cost-effective service. We aim to get it right first time. Where we get something wrong, we will acknowledge it, correct it and learn from it.

Accountability

52 QAA is accountable to its subscribers - the universities and higher education colleges - and to a wide range of other stakeholders. We aim to demonstrate that we use our resources to good effect.

Openness

53 We aim to be open and approachable, and to be transparent in our work and methods. We aim to communicate in a clear, consistent and accessible way.

Organisational structure

54 QAA is organised into five operational groups. The Chief Executive leads the Chief Executive's Group which includes the corporate affairs and international affairs functions. The other four groups are each headed by a group director:

- Reviews Group - all of our review and audit activity in England, Wales and Northern Ireland; liaison with Northern Ireland and Wales; and some international work
- Development and Enhancement Group - institutional liaison scheme; work with professional, statutory and regulatory bodies, students and employers; intelligence, good practice and enhancement; maintenance and development of the Academic Infrastructure; and some international work
- QAA Scotland - all aspects of our work in Scotland (from the Glasgow office) and some international work
- Administration Group - aspects of our work with students; all aspects of central services and organisational infrastructure, including finance, communications, human resources, premises, business development, office services and information services.

55 QAA currently employs 131 staff, of whom 15 are based in Glasgow.

Finances

56 QAA is funded from two principal sources: subscriptions from higher education institutions; and contracts with the higher education funding councils. A third, smaller, source of income is generated from self-funding activities and contracts. This arrangement derives from the history of QAA: one of its predecessor bodies, the Higher Education Quality Council (HEQC) was funded entirely by institutional subscriptions, while the other predecessors were part of the funding councils and therefore directly funded by them.

57 The dual funding was continued after QAA was established, it being agreed at that time that the costs of institutional reviews and related activities, including the Access Courses Recognition Scheme (see paragraphs 80 and 81) and the bulk of the infrastructure costs, should be attributed to the institutional subscriptions, while the cost of subject reviews and associated overheads, should be met by the funding councils, who were contracting for QAA's services. With the cessation of subject-level activity and the adoption of institutional level reviews as the principal quality assurance process, the rationale for this notional attribution of funds was no longer sustainable on those grounds: all funders had a direct interest in the provision of the audits. Nevertheless, it was agreed that there was continued advantage to all parties in maintaining a mixed mode of funding for QAA, as it reduced the influence of any one interest group.

58 To determine the level of payments, the funding and representative bodies have agreed a formula with QAA which identifies an allocation of costs to the administrative jurisdictions which incur them. Each one, England, Scotland, Wales or Northern Ireland, pays the full costs of the services which it incurs and an agreed

proportion of organisational overheads. They then each agree the allocation of costs between subscribing institutions and the appropriate funding body. In Scotland and Wales the representative body and the funding council have entered into a three-way contract with QAA. All other contracted activities are designed to be self-funding with a contribution to overheads.

59 QAA's subscribers now comprise all publicly-funded HEIs in the UK, all privately-funded organisations which hold DAPs, and a small number of voluntary privately-funded organisations, totalling 174 institutions.

60 In 2006-07 QAA's total income was £10 million.

Relationship with other organisations

61 QAA is an independent organisation working within a complex and advanced higher education system: consequently there are a number of other organisations that have a bearing on our work.

62 The Higher Education Regulation Review Group (HERRG) is a regulation review (or 'gatekeeper') group for higher education in England. It was established in summer 2004 by the Minister for Lifelong Learning, Further and Higher Education, and is sponsored by the Department for Innovation, Universities and Skills (DIUS).

63 Its membership is made up of frontline practitioners, mainly registrars and directors of finance from universities, and its aims are to review policies relating to higher education for their regulatory impact on institutions in England regardless of the source of the policies. HERRG also explores existing areas of bureaucratic demand and recommends ways of doing things that better promote the Government's Principles of Good Regulation⁹.

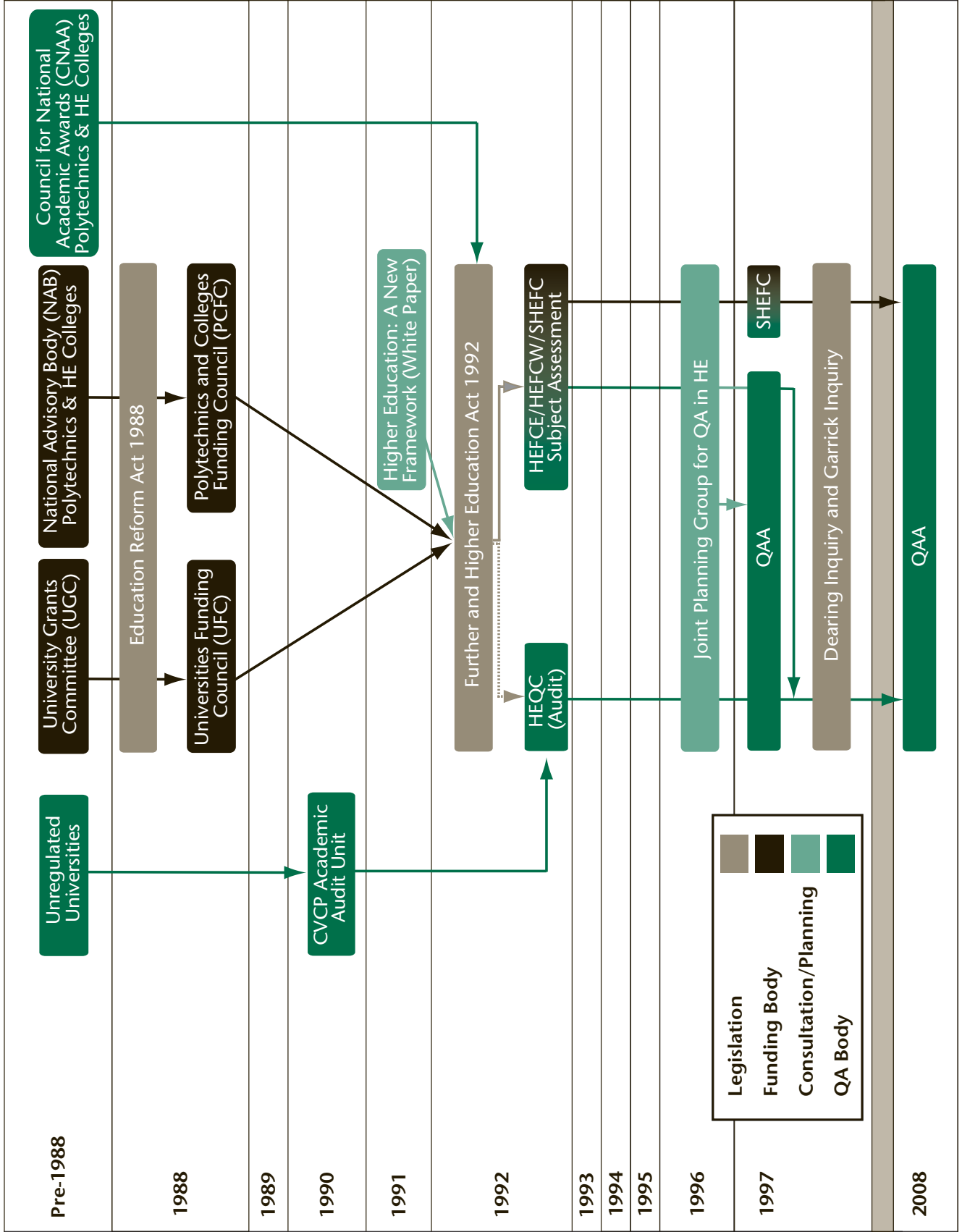
64 The Quality Assurance Framework Review Group (QAFRG) was established by the Better Regulation Review Group - a Group set up by the Department for Education and Skills (now the Department for Children, Schools and Families and DIUS) in 2004 in response to a 2002 Better Regulation Task Force recommendation - as a response to a recommendation made by the Better Regulation Task Force in its 2002 report *Higher Education: Easing the Burden*. The recommendation was subsequently considered by the Better Regulation Review Group, which asked UUK, the Standing Conference of Principals - now GuildHE - and HEFCE, to jointly undertake the review.

65 The QAFRG comprises representatives of HEIs, HEFCE, the National Union of Students and the General Medical Council (representing professional and statutory bodies). The Chief Executive of QAA was invited to join this group as an observer.

66 QAFRG has reported in 2005 (on institutional audit), 2007 (on quality-related information), and is due to report in April 2008 on collaborative provision audits. It will then have completed its work.

⁹ <http://archive.cabinetoffice.gov.uk/brc/publications/principlesentry.html>

The history of QAA



The history of QAA and evaluation in UK higher education

Quality assurance before 1990

67 Prior to the early 1990s, university programmes and awards were not subject to any external monitoring or regulation other than the use of external examiners and (as now) each institution was responsible for ensuring the quality and standards of its own programmes. Higher education delivered by polytechnics and some higher education colleges was externally quality assured by the Council for National Academic Awards (CNAA) (established 1964), which also awarded their degrees.

The Academic Audit Unit 1990-92

68 A series of efficiency studies initiated by the universities themselves in the late 1980s led to the establishment of an Academic Standards Group. In 1990 the universities established the Committee of Vice Chancellors and Principals Academic Audit Unit (AAU) to take forward the recommendations of the Academic Standards Group. The AAU undertook peer-review academic audits of universities, scrutinising key areas where academic standards were set and monitored. Reports were published on a voluntary (but near-universal) basis and contained no formal judgements or recommendations. It also undertook a more limited set of audits of 'collaborative provision' (activities involving a third party).

Quality assurance 1992-97: HEQC and the higher education funding councils

69 In 1992 the passing of the *Further and Higher Education Act* led to a number of fundamental changes in the way higher education in the UK was structured and funded. First, the Act abolished the existing binary system and re-designated polytechnics as universities, with their own DAPs: the now-redundant CNAA was closed down. A sector-owned HEQC was established, which was tasked with auditing institutions' management of their internal quality assurance processes. This was undertaken by the AAU, now absorbed into HEQC as its Division of Quality Audit. The HEQC also took over some of the non-awarding work of the CNAA, thereby giving HEQC an important quality enhancement role in addition to its audit function.

70 Secondly, the three new UK funding councils created by the Act were statutorily required to establish quality assessment committees to manage the assessment of the quality of the work that they funded. Subject-based inspection models were introduced by all the funding councils (initially called 'teaching quality assessments' (TQA), later 'subject reviews') and these underwent a number of modifications between 1993 and 2001 when the English and Northern Irish programme was finally completed (the smaller Scottish and Welsh systems had completed their subject review programmes in 1997).

QAA 1997 onwards

71 External subject reviews were always controversial with HEIs which complained about their inappropriateness, intrusiveness and cost, and of the duplication of effort with the separate institutional audit procedure of HEQC. In 1996 a Joint Planning

Group was convened from the funding councils and the institutions' representative bodies to try to design a unified quality assurance system that combined the two strands of audit and subject review. Although no feasible unified review method emerged, it did provide the blueprint for a single quality assurance agency which was established in April 1997 as QAA. At its inception QAA brought together the HEQC and the quality assessment divisions of HEFCE and HEFCW. The Scottish Higher Education Funding Council agreed to contract its quality assurance activities to QAA some time later.

72 The *Dearing Report* published later in 1997 considerably expanded the duties of the new agency beyond the undertaking of assessments and audits to include the provision of public information on quality assurance; verification of standards; creation and maintenance of a higher education qualifications framework; development of a code of practice; provision of benchmark standards; and the creation of a pool of external examiners. Although not all of these proposals were adopted, most were, and QAA's position as the UK's sole agency with responsibility for the assurance and enhancement of the quality and standards of higher education was consolidated.

73 Between 1997 and 2001 QAA continued operating both subject reviews and academic audits (now into their second, 'continuation audit' cycle) and developed most of the Dearing proposals, including the elements of the Academic Infrastructure and a new, UK-wide review process, to be called 'academic review'. This was to have comprised elements of both subject review and institutional audit and envisaged a gradual transition from the former to the latter, as individual institutions were deemed by QAA to justify the move. In practice, to most institutions it simply looked like a continuation of the previous burdensome twin-tracked approach.

74 In 2001, despite the fact that there had been general acceptance of the academic review proposal across the UK and QAA had already begun to use the process in Scotland, a number of English universities complained to the Government that this new approach did not meet their demands for a lighter burden of external quality assurance and would perpetuate the high costs and limited benefits that they perceived in the previous arrangements. As a result of these representations, the Government declared publicly that there would be a reduction in the volume of reviewing undertaken by QAA. No forewarning of this decision had been given to the Scottish or Welsh higher education authorities, however, and their response was to disengage from the UK-wide scheme and set up their own national arrangements. In England, HEFCE, the representative bodies of the HEIs, the government education department and QAA, devised a new quality assurance approach grounded in the academic quality audit method used by QAA and its predecessors since 1991. Scotland developed the ELIR procedure (see Annex 5) and Wales its institutional reviews. Northern Ireland followed England and adopted the modified institutional audit process. QAA remained the organisation charged with developing and undertaking these activities. The English subject review cycle was completed in 2001 and then discontinued.

75 As part of the 2001 agreement between the key stakeholders about the future of external quality assurance in England, it was agreed that there should be a transitional period of three years, between 2002 and 2005, when all English HEIs

should be audited using the new method. Thereafter audits would take place on a six-yearly cycle. In the years before that in which they were to be audited, institutions should have had a small number of 'developmental engagements' with QAA, low-key, unpublished, subject-based reviews for the purposes of enhancing internal institutional quality assurance cultures and developing capacity.

76 The English 'transitional period' institutional audit method included 'discipline audit trails' (DATs), selective subject-based enquiries which enabled a phased reduction of the subject focus of QAA reviews. In 2005 a revised 'steady-state' audit model was developed and adopted with the agreement of the representative bodies and HEFCE. This removed the DATs, thereby freeing time in the audit process to explore a broader range of topics and themes, while retaining the 'audit trail' procedure to gather evidence and focus scrutiny. This model is currently in use and a six-year cycle is being implemented.

77 In addition to the whole institution audits and reviews, QAA has continued to audit both collaborative provision in England and Wales¹⁰ and international activity (through its programme of 'overseas audits', started by HEQC in 1997¹¹).

Other activities

78 This section of the self-evaluation has focused principally on the development of the main external quality assurance procedures used in the UK since 1990 - beginning with academic audit, moving through the parallel procedures of quality audit TQA/subject review, and finally emerging with the current suite of institutionally-focused reviews described variously in England/Northern Ireland, Scotland and Wales as institutional audit, ELIR and institutional review. But in addition to these mainstream review processes, QAA also undertakes a variety of other activities. Some of these involve assessments and scrutinies, while others are concerned with the development and enhancement of good practice in the management of standards and quality. Again, there are different approaches and emphases in different parts of the UK towards these aspects of QAA's work. Because these specific activities largely fall outside the general scope of the ESG, there will be no attempt to describe them in detail, but in order that a complete picture of QAA's work should be available to the review team, they are described here in outline.

¹⁰ www.qaa.ac.uk/reviews/institutionalAudit/collaborative/default.asp

¹¹ Some UK institutions offer programmes in many different countries through links with other organisations. We review these partnerships to ensure that the quality and standards offered to students in UK institutions are equally available in the programmes available overseas, www.qaa.ac.uk/reviews/reports/byoseascountry.asp

DAPs and university title (UK-wide)

79 The national arrangements for the granting of DAPs and university title have already been described (paragraphs 5 to 8). QAA, at the request of the relevant national government department, undertakes a detailed and rigorous peer review assessment of organisations' applications, including several site visits, normally lasting for one complete cycle of academic activity (ie up to 12 months), and submits confidential advice, with a recommendation, to the government department. The assessors' reports are not published, although drafts are given to the institutions concerned, and it is sometimes possible to combine the DAP assessment with a routine institutional audit, in which case an audit report is published in the normal way. The costs of the DAP assessments are met by the applicant institutions in accordance with a scale of charges agreed between QAA and the government departments. The current procedures for obtaining DAPs and university title, together with the relevant criteria, as approved by the national governments, are publicly available at www.qaa.ac.uk/reviews/dap/default.asp

Access to Higher Education recognition scheme (EWN)

80 Access to Higher Education programmes respond to the call for wider participation in higher education, and assume the need for, and desirability of, increased participation by those groups which are currently under-represented in higher education. They are provided in further education colleges as preparation for entry into higher education. QAA's Recognition Scheme for Access to Higher Education is built on the principle of extending opportunities for progression to higher education for those adults who have not previously had the chance, following their past educational experience.

81 Under the terms of this scheme, which operates in England, Wales and Northern Ireland, QAA licenses access validating agencies (AVAs) to recognise Access to Higher Education programmes, and to award Access to Higher Education certificates and diplomas to students. QAA exercises its responsibilities for oversight of the recognition scheme through systems and procedures for the licensing and periodic review of AVAs, and the monitoring of AVA activity through the receipt of regular reports and statistical data from AVAs. These procedures involve the consideration by QAA of AVAs' structures, operational procedures and quality assurance processes. Through these mechanisms, QAA monitors, assesses and regulates the effectiveness of the AVAs in establishing and maintaining the quality of Access to Higher Education programmes and standards of student achievement. QAA is also responsible for the collection and dissemination of data about Access to Higher Education provision and student achievement and progression, and for producing regular reports on its own activities. The activities associated with these responsibilities are directed by QAA's Access Recognition and Licensing Committee.

Enhancement (UK-wide)

82 All QAA review methods place an increasing importance on enhancement as a key aspect of managing quality, and enhancement is a key theme of QAA's work.

83 QAA's enhancement work includes maintenance of the Academic Infrastructure (see paragraphs 16 to 18), highlighting themes, questions, good practice and recommendations and disseminating the information gained through its activities. This includes providing collective and sector-wide intelligence obtained from reviews and audits, institutional liaison and other developmental work within the sector.

84 Thematic briefings are provided in publication series such as *Quality Matters*, *Outcomes from Institutional Audit*, *Outcomes from Collaborative Provision Audit*, and Enhancement Themes papers¹². Good practice is shared through a series of good practice papers and sector-wide overview reports. Reports so far have focused on AVA review, continuation audit, developmental engagements, Foundation Degrees, higher education in further education colleges, and subject review.

Integrated quality and enhancement review (England)

85 QAA undertakes reviews of higher education provision delivered in further education colleges (colleges) on behalf of HEFCE, which has statutory responsibility for ensuring that provision is made for assessing the quality of education provided by institutions it funds. From 2007-08 the process of review used in colleges in England is called integrated quality and enhancement review (IQER). Approximately 10 per cent of all higher education students are studying in colleges.

86 IQER is an evidence-based peer review of both a college's management of its students' learning experience and the performance of its responsibilities for the academic standards and quality of its higher education provision. Colleges do not currently have powers to award higher education qualifications. They work with awarding bodies, in particular Edexcel and/or one or more HEIs. The awarding bodies retain responsibility for the academic standards of all awards granted in their names and for ensuring that the quality of learning opportunities offered through collaborative arrangements is at least adequate to enable students to achieve the academic standard required for their awards. IQER focuses on how colleges discharge their responsibilities within the context of their agreements with awarding bodies. QAA reviews the responsibilities of HEIs within these relationships through institutional audit.

¹² Further information is available at www.qaa.ac.uk/enhancement/default.asp

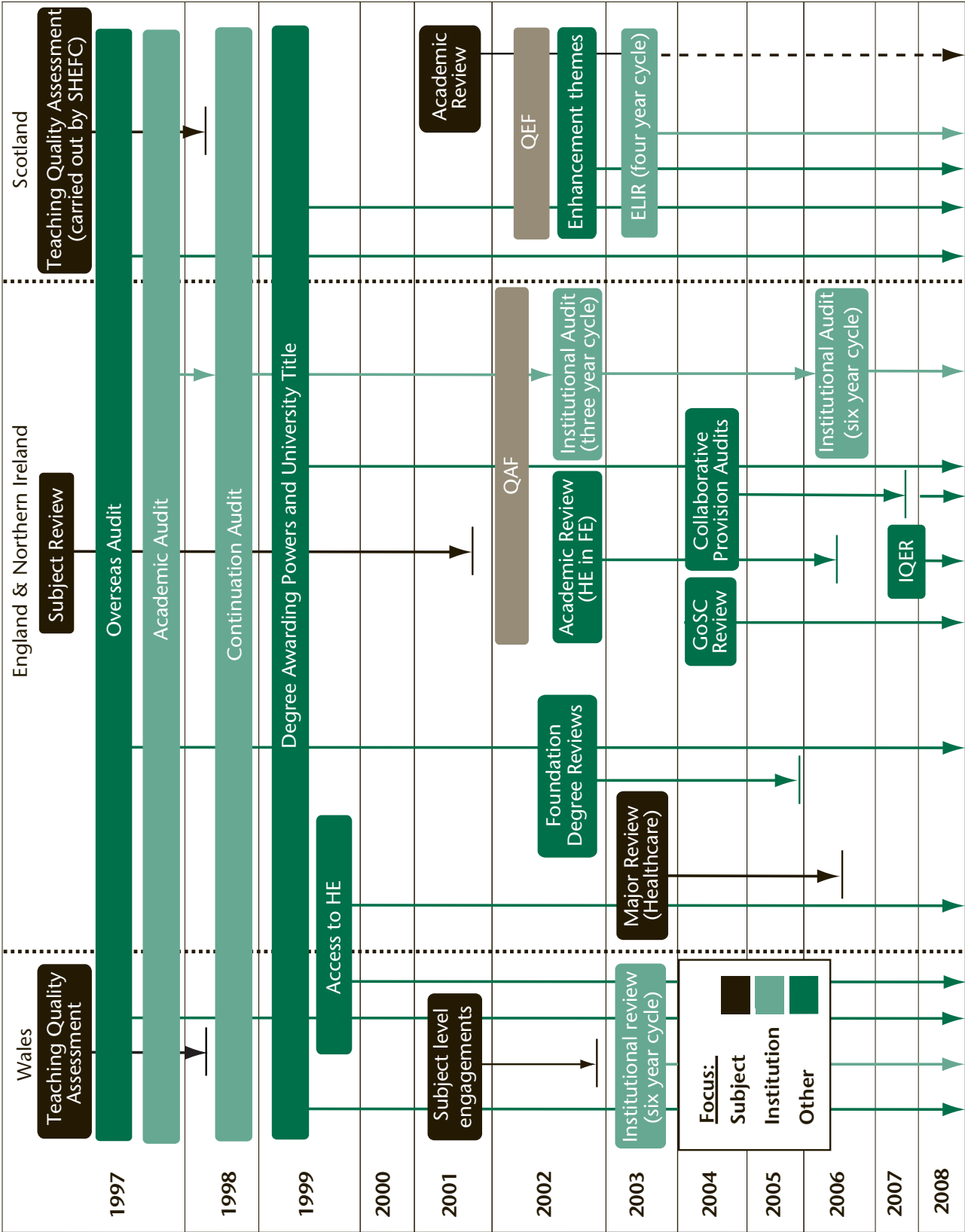
Procedures used by QAA

87 The procedures used by QAA are all described in detail in the handbooks published for each of the review, audit and other scrutiny processes. These are as follows:

- Handbook for institutional audit: England and Northern Ireland (Annex 4)
www.qaa.ac.uk/reviews/institutionalAudit/handbook2006/handbookComments.pdf
- Handbook for enhancement-led institutional review: Scotland (Annex 5)
www.qaa.ac.uk/reviews/ELIR/handbook/scottish_hbook.pdf
- Handbook for institutional review: Wales (Annex 6)
www.qaa.ac.uk/reviews/reviewWales/handbook/Welsh_handbook_english.pdf
- A brief guide to QAA's involvement in degree-awarding powers and university title
www.qaa.ac.uk/reviews/dap/briefGuideDAP.asp
- Handbook for Integrated Quality and Enhancement Review (Annex 7)
www.qaa.ac.uk/reviews/IQER/handbook08/Handbook2008.pdf

88 The development of these procedures is shown in diagram 2 - The history of QAA procedures.

The history of QAA Procedures



Compliance with the European Standards and Guidelines for Quality Assurance in Higher Education

89 This section of the self-evaluation itemises the individual standards and guidelines of the ESG, which are followed by QAA's account of the way in which it meets them, together with the sources of relevant evidence. The paragraph numbers of each standard of the ESG are those used in ENQA's 1995 report to ministers in Bergen, *Standards and Guidelines for Quality Assurance in the European Higher Education Area*¹³.

2.4 Part 2: European standards and guidelines for the external quality assurance of higher education

2.4.1 Use of internal quality assurance procedures

Standard:

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

Guidelines:

The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met.

If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

QAA compliance

90 All of QAA's institutional review processes are designed to test institutions' internal quality assurance policies and procedures. Indeed, the audit and review processes are based firmly round the institutions' self-evaluations of their own processes. The reference points used by QAA for this purpose are contained in the elements of the Academic Infrastructure, which are themselves compatible with section 1 of the ESG. Documentary evidence of this is available in the handbooks (see Annexes 4 to 7).

¹³ www.enqa.eu/files/ESG_v03.pdf

2.4.2 Development of external quality assurance processes

Standard:

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

Guidelines:

In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used.

As external quality assurance makes demands on the institutions involved, a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

QAA compliance

91 In developing its institutional review processes, QAA first discusses the purposes of the reviews with key stakeholders and, when consensus is reached, produces a draft operational description. This is consulted upon with all stakeholders, including all institutions, and a handbook, containing the details of the processes, is published in advance of any reviews taking place.

92 QAA is a signatory to HERRG's concordat. The concordat is a sector-wide agreement that aims to reduce unnecessary burden of external regulation on institutions, thus ensuring that demands placed on them are reasonable and appropriate to the level of assurance required. In Scotland, QAA is a member of the Higher Education Quality Working Group (HEQWG) which performs a broadly similar function. QAA also carries out and publishes regulatory impact assessments for its review procedures, such as institutional audit and IQER.

2.4.3 Criteria for decisions

Standard:

Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

Guidelines:

Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

QAA compliance

93 QAA's criteria for its decision-making procedures are all published in its handbooks and other operational documents. Management of the peer review teams is in the hands of trained and professional assistant directors, who ensure that the judgements of the teams are defensible in terms of the evidence available to support them, and who are also responsible for exercising editorial control over the drafting of reports by the team members. All report drafts are required to include references to the sources of the supporting evidence for analyses and judgements. QAA adopts the policy of entrusting the judgements to the team members, while retaining control over the form of the content of the reports.

2.4.4 Processes fit for purpose

Standard:

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

Guidelines:

Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes. Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance.

Amongst these elements the following are particularly noteworthy:

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task
- the exercise of care in the selection of experts
- the provision of appropriate briefing or training for experts
- the use of international experts
- participation of students
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review
- recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality.

QAA compliance

94 QAA has always based its processes on the 'fitness for purpose' principle. As a result it uses different procedures for the various review processes that it undertakes. All, however, involve careful selection of reviewers against published criteria, the training of reviewers, usually through a three-day programme in advance of their first review, backed up by twice-yearly meetings. These provide opportunities for

reviewers to learn of new developments, report on their reviewing experience, and share ideas with other reviewers and QAA staff.

95 Reviewers are nominated principally by heads of institutions and are selected by QAA in an extensive, criterion-based process, in which nominees are matched against the criteria. Account is taken of the need for gender, geographical and professional balances among the reviewer cohort. In Scotland students are included in review teams as full members and there are plans to extend this to other parts of the UK. As of January 2008 English institutional audit teams include a student observer, and this role will be upgraded to a full member by the time the next audit cycle starts, in 2011, if not sooner. At present, students can choose to submit a written submission to be examined by the review team, and the team also meets privately with student union officers during the site visit. QAA has a wider student strategy than simply including students in audit teams, however, and devotes considerable time and resources to supporting student involvement with quality-related activities within their institutions.

96 QAA operates an open recruitment method for reviewers. The equality policy operated for the recruitment of reviewers states that no discrimination must occur on the grounds of race, colour, creed, ethnic or national origins, nationality, disability, age, sex, sexual orientation, marital status or family responsibility.

97 QAA does not have a tradition of using international experts, largely because of the scale of the review programme and the high level of detailed knowledge and understanding of the UK's higher education systems and their management arrangements needed to be an effective reviewer. This position will probably change in the coming year, when revisions to the Scottish ELIR system are likely to include an international expert in review teams. If this proves successful, it will probably be adopted elsewhere in the UK.

98 For further information on the audit and review processes, and the recruitment, selection and training of auditors, refer to the handbooks (Annexes 4 to 7). As can be seen from the handbooks, all QAA's review processes use the 'four stage' model of self-evaluation/site visit/published report/follow-up. Site visits typically last four days.

99 All QAA review methods place an increasing importance on enhancement as a key aspect of managing quality.

2.4.5 Reporting

Standard:

Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

Guidelines:

In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership. Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone.

In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations. There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers. Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

QAA compliance

100 QAA publishes its review reports both in hard copy and on its website¹⁴. Reports include a judgement on the degree of confidence QAA has in the standards and quality of the institution and/or programme and provide commendations and recommendations on the practices of the institution. Many different attempts have been made over the years to ensure that the style and content of the reports meet the needs of the various audiences for which they are intended. The recently introduced reports for institutional audit in England and Northern Ireland are trying to improve the usability of reports by dividing them into two: a concise report for a general audience, containing the judgement of confidence, recommendations and commendations; and a longer 'technical annex' containing the detailed descriptions and analyses of institutional quality assurance systems aimed at a more specialist audience. The technical annex is published only on the website.

101 QAA also publishes guides that help stakeholders to make best use of the reports, for example the QAA/UCAS student guide and the guide for international students. International guides are translated and available in a selection of languages¹⁵.

102 Reports on Welsh institutions are also available in Welsh, in accordance with the Welsh Language Scheme.

2.4.6 Follow up-procedures

Standard:

Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

Guidelines:

Quality assurance is not principally about individual external scrutiny events: it should be about continuously trying to do a better job. External quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

¹⁴ Further information is available at www.qaa.ac.uk/reviews/default.asp

¹⁵ Further information is available at www.qaa.ac.uk/students/guides/default.asp and www.qaa.ac.uk/international/default.asp

QAA compliance

103 QAA reviews have always included some form of follow-up. In earlier models this comprised a 'one-year-after' enquiry asking about the action taken in response to recommendations. In Scotland, this requirement remains: in cases where significant problems have been identified, there is a requirement on the institution to submit an action plan within a specified time period which must be approved, monitored and then signed off. In the current English and Welsh methods this procedure has been replaced by a desk-based check half way between audits, where institutions are requested to provide information, including copies of internal review reports, demonstrating progress since the last audit. In the current Scottish method this procedure forms part of an annual discussion with institutions. Institutions that receive a 'no confidence' or 'limited confidence' judgement in their audits are required to produce an action plan, which is monitored by QAA. The audit is not 'signed off' until the institution can demonstrate that the action plan has been implemented satisfactorily. A maximum 18-month period is allowed for the implementation process. (See the handbooks in Annexes 4 to 7 for further information.)

2.4.7 Periodic reviews

Standard:

External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

Guidelines:

Quality assurance is not a static but a dynamic process. It should be continuous and not 'once in a lifetime'. It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

QAA compliance

104 QAA currently operates its institutional audit process in England and Northern Ireland over a six-year period. ELIR runs on a four-yearly cycle at present in Scotland, as does institutional review in Wales. The cycles are agreed with institutions' representative bodies and funding councils and are published. The institutions' position in the cycle is communicated to them at the start of the cycle.

105 QAA is a signatory of the HERRG concordat and endeavours to ensure that demands on institutions are appropriate to the level of assurance required and the achievement of objectives.

2.4.8 System-wide analysis

Standard:

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments, etc.

Guidelines:

All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work.

QAA compliance

106 QAA produces a large number of analytical reports of the findings of its reviews and publishes these both in hard copy and on its website. The most significant recent developments in this work have been of a series of publications analysing aspects of the findings of institutional audit reports in England and Northern Ireland, entitled *Outcomes from...* QAA also produces more general *Learning from...* analyses as well as *Quality Matters*, an occasional series of exploratory essays relating to aspects of quality assurance. A list is available at www.qaa.ac.uk/enhancement/default.asp In Scotland, a *Learning from ELIR* series is published. The outcomes from ELIR are also used to inform the work of the Enhancement Themes initiative¹⁶ and other general enhancement activities. Most of QAA's research and analysis is undertaken by its Development and Enhancement Group. Statistical analyses are undertaken by the Information Unit, based in the Reviews Group. QAA also publishes reports and notes on a number of quality assurance matters, and organises sector-wide events to discuss external review practices.

2.6 Part 3: European standards and guidelines for external quality assurance agencies

2.6.1 Use of external quality assurance procedures for higher education

Standard:

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

¹⁶ The Enhancement Themes initiative aims to enhance the student learning experience in Scottish higher education by identifying specific areas (Themes) for development. The Themes encourage academic and support staff and students to share current good practice and collectively generate ideas and models for innovation in learning and teaching. The Themes are part of the Quality Enhancement Framework. www.enhancementthemes.ac.uk/background/default.asp

Guidelines:

The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions.

The standards for external quality assurance should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

QAA compliance

107 As described in the previous section, QAA's processes and procedures are based on Part 2 of the ESG.

2.6.2 Official status

Standard:

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

QAA compliance

108 Although not a government organisation, QAA is recognised by the national and devolved governments within the UK as the body responsible for external quality assurance in higher education. The governments commission QAA to advise them on applications for DAPs and university title. The higher education funding councils contract with QAA to provide assessments of the education and institutions they fund, in discharge of their statutory obligations under the 1992 *Further and Higher Education Act*.

109 QAA is a company limited by guarantee and a charity registered in England and separately in Scotland. The members of the company are UUK, Universities Scotland, HEW, and GuildHE. QAA operates according to English and Scottish law, as appropriate.

110 QAA's Memorandum of Association¹⁷ states its objectives as follows:

- the promotion and maintenance of quality and standards in higher education in the UK and elsewhere
- the enhancement of teaching and learning, and the identification and promotion of innovation and good practice in teaching and learning
- the provision of information and the publication of reports on quality and standards in higher education in the UK and elsewhere
- the provision of advice to governments, as requested, on access course recognition and in relation to all or any of the above objects.

¹⁷ Further information is available at www.qaa.ac.uk/aboutus/MemorandumAssoc.asp

2.6.3 Activities

Standard:

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

Guidelines:

These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

QAA compliance

111 QAA currently undertakes institutional audits over a six-year period in England and Northern Ireland, ELIR on a four-year cycle in Scotland and institutional review on a six-year cycle in Wales. It also undertakes reviews of publicly-funded higher education in colleges on a regular basis. Reports of all the reviews conducted by QAA since 2002 are available on QAA's website ¹⁸.

2.6.4 Resources

Standard:

Agencies should have adequate and proportionate resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

QAA compliance

112 QAA has appropriate and proportionate resources to support all its operations. QAA's head office is in Gloucester, England and a second office in Glasgow is responsible for all activities in Scotland. QAA also uses a small office in London to support the activities of its staff, auditors, and reviewers.

113 QAA employs 130 staff and contracts from a pool of more than 500 trained auditors and reviewers. QAA must also employ appropriate (human) resources to satisfy the obligation that English and Welsh languages are treated equally in all Welsh operations.

114 QAA is primarily funded from subscriptions from HEIs and contracts with the higher education funding councils. Additional income is generated through self-funding activities and contracts. In 2006-07 QAA's total income was over £10 million. It has reserves amounting to approximately £3 million.

¹⁸ www.qaa.ac.uk/reviews/default.asp

2.6.5 Mission statement

Standard:

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

Guidelines:

These statements should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

QAA compliance

Mission

115 Our mission is to safeguard the public interest in sound standards of higher education qualifications and to inform and encourage continuous improvement in the management of the quality of higher education.

116 QAA's explicit goals are outlined below and are further defined in the Memorandum of Association that is publicly available on QAA's website.

Purposes

117 To achieve its mission, QAA works in partnership with the providers and funders of higher education, staff and students in higher education, employers and other stakeholders, to:

- safeguard the student and wider public interest in the maintenance of standards of academic awards and the quality of higher education
- communicate information on academic standards and quality to inform student choice and employers' understanding, and to underpin public policy-making
- enhance the assurance and management of standards and quality in higher education
- promote wider understanding of the nature of standards and quality in higher education, including the maintenance of common reference points, drawing on UK, other European and international practice.

118 To translate these statements into a clear policy and management plan, QAA uses strategic plans to set the main goals and objectives over a set period of time. Currently QAA is operating under the 2006-11 strategic plan. The strategic plan is publicly available on QAA's website (Annex 3)¹⁹.

¹⁹ www.qaa.ac.uk/aboutus/strategicPlan/default.asp

119 In turn, the strategic plan is used as the basis for a published annual operating plan. The annual operating plan summarises the group operating plans which contain the detailed work plan for each group for the year. Each year an annual review²⁰ is also published describing the achievements of the previous year's work. See Annex 9 for a draft version of the 2006-07 annual review.

2.6.6 Independence

Standard:

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

Guidelines:

An agency will need to demonstrate its independence through measures, such as:

- its operational independence from higher education institutions and governments is guaranteed in official documentation (eg instruments of governance or legislative acts)
- the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence
- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

QAA compliance

120 QAA is an independent body, established as a company limited by guarantee and having charitable status. It has no formal links to governments or individual HEIs. It is entirely independent in its operations. All reports, decisions, judgements, recommendations and commendations are those of QAA and its contracted peer reviewers.

121 The members of the company are the bodies representing HEIs, but the Board is structured so as to guarantee the independence of QAA. Four members of the Board are appointed by the representative bodies, four are appointed by the funding councils, and seven (of whom one is a student and one must be the Chairman) are independent members appointed by the Board itself. The independent members are chosen so as to be broadly representative of employers of graduates. Two observers, representing the interests of government education departments, and the HEA, may attend Board meetings.

122 QAA's procedures and methods are determined by the Board in the light of consultations with stakeholders. The nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are

²⁰ www.qaa.ac.uk/aboutus/annualReports/default.asp

undertaken entirely within QAA, according to the published procedures. Further information on auditor and reviewer nomination and recruitment for each review process is contained in the relevant handbook (see Annexes 4 to 7).

2.6.7 External quality assurance criteria and processes used by the agencies

Standard:

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:

- a self-assessment or equivalent procedure by the subject of the quality assurance process
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency
- publication of a report, including any decisions, recommendations or other formal outcomes
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

Guidelines:

Agencies may develop and use other processes and procedures for particular purposes.

Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.

Agencies that make formal quality assurance decisions, or conclusions which have formal consequences, should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

QAA compliance

123 All QAA review processes include self-evaluation; external assessments and site visits by a group of experts; publication of a report; and a follow-up procedure to review actions taken following the recommendations made. Detailed information regarding these processes is publicly available in QAA handbooks (see Annexes 4 to 7). Each individual review is evaluated through questionnaires sent to reviewers, students, and the institution.

124 QAA distinguishes between complaints and appeals. A complaint is an expression of dissatisfaction with services provided by QAA or actions taken by it. Complaints are handled through the published *Complaints from institutions: Procedures*. Appeals are challenges to specific decisions, in specific circumstances, and are handled through the published *Institutional audit and review: Procedures on representations*. The representation procedures are available to an institution where a team has judged that it has 'no confidence' in the soundness of the institution's procedures for the present and likely future management of the quality of its programmes and the academic standards of its awards. This is the only circumstance in which a representation may be made against a team's judgements.

125 All appeals must be submitted in writing by the head of the institution to the Head of Corporate Affairs at QAA. For further information see QAA's website²¹.

2.6.8 Accountability procedures

Standard:

Agencies should have in place procedures for their own accountability.

Guidelines:

These procedures are expected to include the following:

- 1 A published policy for the assurance of the quality of the agency itself, made available on its website.
- 2 Documentation which demonstrates that:
 - the agency's processes and results reflect its mission and goals of quality assurance
 - the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts
 - the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties
 - the agency has in place internal quality assurance procedures which include an internal feedback mechanism (ie means to collect feedback from its own staff and council/Board); an internal reflection mechanism (ie means to react to internal and external recommendations for improvement); and an external feedback mechanism (ie means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.
- 3 A mandatory cyclical external review of the agency's activities at least once every five years.

QAA compliance

126 QAA is accountable, and/or reports regularly, to the following organisations:

- the members of the company (UUK, Universities Scotland, HEW, GuildHE)
- the higher education funding councils
- the Charity Commission (England and Wales)
- The Office of the Scottish Charities Regulator
- Companies House
- HERRG (England)
- HEQWG (Scotland)
- QAFRG (England and Northern Ireland))

²¹ www.qaa.ac.uk/aboutus/policy/representations.asp

- the HEFCE Quality Assurance of Learning and Teaching Group (England)
- the HEFCW Learning and Teaching Group (Wales)
- the Scottish and Credit Qualifications Framework Group
- its subscribing institutions.

127 QAA is subject to English companies law; English charities law; and Scottish charities law. In addition, QAA is inspected annually by its external auditors and is subject to a series of studies of aspects of its work by its appointed independent internal auditors.

128 QAA operates a number of internal policies, for example:

- data protection policy
- electronic communications policy
- equal opportunities policy
- evaluation policy
- human resources policies
- information management policy
- information security policy
- media relations policy
- publishing policy
- records management policy
- risk management policy
- treasury management policy.

129 All policies are available on the web in line with QAA's publication scheme, which aims to make as much information publicly available as possible.

130 QAA publishes an annual report with details of its activities to ensure that its processes and results reflect its mission and goals. In addition, QAA publishes the reports sent to the funding councils documenting the fulfilment of its obligations under contract.

131 The appointment and recruitment procedures for QAA reviewers and auditors ensure there are no conflicts of interest, and reviewers/auditors may not review or audit their own institutions. Assistant directors work closely with auditors and reviewers to ensure that all work produced externally by subcontractors is of an acceptable standard and fit for purpose. Further information on these procedures can be found in the handbooks (Annexes 4 to 7).

132 QAA employs a number of mechanisms for internal and external feedback. These include:

- an annual staff survey to monitor the satisfaction of employees
- monthly staff briefings led by the Chief Executive

- regular 'Chats with the Chief' to encourage staff to discuss views and opinions with the Chief Executive
- a 'Smarter thinking: better working' scheme to encourage staff to suggest ways of improving QAA's performance and efficiency
- regular surveys of external stakeholders' views
- external evaluations of QAA processes, eg in Scotland, the SFC has commissioned a longitudinal survey of stakeholder views of QAA (and related) processes from an independent evaluation team.

133 QAA must undergo a mandatory cyclical external review of QAA's activities at least once every five years in order to confirm continued membership of ENQA.

Views of key stakeholders

In September 2006 the Chairman of QAA's Board of Directors wrote to 21 key partners and stakeholders to request their views on QAA's performance. Responses were received from 10 organisations, and the General Osteopathic Council made relevant comments as part of the joint evaluation of its review method.

A number of general points emerged from the feedback.

- The overall picture was positive. Our key partners spoke very positively about the quality of our work and our communications, consistency with our published standards and values, and about our contribution to improvement and enhancement in the sector and to public confidence in higher education.
- The responses also referred positively to sector and stakeholder confidence in higher education.
- There were a number of specific points in some of the letters - for example about communication delays; notification of publications and consultations; coordination and liaison; the value of regular meetings; and coordination between the two QAA offices - that we followed up with the respondent bilaterally.
- There were fewer comments about the effectiveness of the Board - partly because of lack of familiarity with the Board, and partly because of the difficulty of making a clear distinction between the effectiveness of QAA as an organisation, and the effectiveness of the Board as its governing body.

Annexes

Annex 1 - Guidelines for national reviews of ENQA member agencies, ENQA, 2006

Annex 2 - UK HE Europe Unit Guide to the Diploma Supplement

Annex 3 - 2006-11 strategic plan

Annex 4 - Handbook for institutional audit: England and Northern Ireland

Annex 5 - Handbook for enhancement-led institutional review: Scotland

Annex 6 - Handbook for institutional review: Wales

Annex 7 - Handbook for Integrated Quality and Enhancement Review

**Annex 8 - Standards and Guidelines for Quality Assurance in the European
Higher Education Area**

Annex 9 - Draft 2006-07 annual review

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