

## Future arrangements for quality assurance in England and Northern Ireland

### University Alliance response

#### Introduction

1. University Alliance represents 22 major, dynamic, business-like universities at the heart of the sector which deliver world-leading research with impact and are actively business-focussed<sup>1</sup>.
2. These universities educate 26% of all UK students and offer a research-informed, academic learning environment and a culture of entrepreneurialism, equipping graduates for the 21st century.
3. This response follows discussion amongst our Pro Vice-Chancellors with responsibility for teaching, learning and quality at a University Alliance Quality Seminar held on 18 February 2010. Our response highlights the key issues raised by Alliance universities and is intended to complement the individual and more detailed responses of our members.

#### Key issues

4. University Alliance is grateful for the work of the HEFCE and Universities UK in drawing together the proposals set out in the consultation and in response to concerns raised over quality and standards. We are supportive of the ongoing work which continues to be done in this area particularly in recognition of the need for greater public understanding of the system.
5. Alliance universities are in broad agreement with the approach set out in the consultation but have raised the following key issues for consideration.

#### **Emphasis should be placed on improving public understanding rather than making substantial changes to the system itself**

6. We would like to emphasise the finding of the recent review of teaching quality chaired by Professor Riordan that there is “no systemic failure in quality and standards in English higher education.” While there are clearly areas where improvements can be made to the current system we are concerned that a public misunderstanding issue should not be misinterpreted to justify a radical overhaul. As such we are supportive of the growing focus on the importance of improving public understanding and agree that this should be a key element within the new quality assurance system.

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<sup>1</sup> <http://www.university-alliance.ac.uk/about.html>

### **Public understanding is important but universities should remain the primary audience of audit reports**

7. We strongly support the need for greater public engagement with and understanding of quality assurance and agree that audit reports should be written in simpler language. However, we are concerned that the focus on accessibility should not dilute the value of reports to the academic community.
  
8. In support of this, we strongly agree that the QAA should provide summaries of institutional audit reports for a non-specialist audience. These summaries might helpfully include a summary of actions that institutions intend to take to address the recommendation made. One option would be to incorporate an Executive Summary within the main report for a non-specialist audience.

### **Language used to describe audit judgements should be changed**

9. We strongly agree that the current terminology used by the QAA is poorly understood and should be changed so that a non-specialist audience can understand the understand audit outcomes. In particular it is not clear that 'limited confidence' is in fact a judgement that is 'above the line'. A similar phrase such as 'confidence with caveats' or 'confidence with limitations' which signals that the judgement is 'above the line' would be preferable and less damaging to corporate reputation. In addition, 'confidence' could be strengthened. We would not support a return to a grading system or score.

### **Greater emphasis on enhancement would be welcomed**

10. We would welcome greater emphasis on the importance of enhancement within the system. HEFCE and QAA through audit have encouraged HE to address 'enhancement' and institutions have made significant progress in this area. We would prefer use of the term 'enhancement' over 'improvement' as we consider this to be a more progressive approach in terms of the proactive self reflection and continuous improvement which it denotes.

### **Support for increased flexibility but caution over how it is implemented**

11. We agree that is clearly desirable that the system should be proactive and flexible but would like to emphasise the need for institutions to be confident that they are being treated in an even-handed way by audit and that they are not disadvantaged by shifting trends.
  
12. If such an approach is to safeguard comparability and therefore fairness across the sector, we would prefer to see a system within which a core process is defined and around which there might be the facilities for variation in focus. All institutions in a cycle would experience audit organised according to the core process and,

importantly, using a common set of criteria for judgement, whereas 10-20% of the activity might be used to address emerging areas of interest or enhancement themes. Within this approach minor changes to procedure could be identified as a change to a single theme whereas amendments to a core set of topics should be deemed substantive revisions.

**Support for more emphasis on the provision of public information but clear guidance needed**

13. We believe that a common data set is desirable, so long as the design of this is carefully considered to ensure that stakeholders are comparing 'like with like'. The different ways of presenting contact hours, for example, could lead to genuine confusion. The criteria relating to data presentation need to be clear and unambiguous in order to ensure that statistical information presented by institutions is directly comparable. Where ambiguity prevails, the data presented will mislead rather than inform.

**Avoiding duplication with Professional, Statutory and Regulatory Bodies**

14. We strongly support the sentiment set out in paragraph 37 on the QAA's work to complement and avoid duplication with other assurance processes. This is a key issue for Alliance universities given that a high proportion of our provision is professionally accredited. For example, close to 70% of undergraduate provision at the University of Bradford is professionally accredited. Where relevant, we would encourage greater recognition of the accrediting role of PSRBs elsewhere in the process as an added element of externality.

**Importance of the institution's role**

15. We strongly support the assertion of institutional autonomy and responsibility for internal quality assurance processes, as outlined in 32 f.i. The new or revised methodology should recognise institutional autonomy, particularly the emphasis it places on local needs and expectations.

**Importance of an efficient system**

16. We strongly support the principle set out under 32 g.i. that the revised quality assurance system should "operate efficiently, in order to avoid disproportionate use of institutional effort and resources which could otherwise be directed to the delivery of front-line student teaching." It is essential that any new method recognises what has been achieved so far and does not return to a system of audit which places an undue administrative and resource burden on institutions and which may also serve as a distraction from core business.

### **Comparability of standards**

17. The assurance of threshold standards is best achieved by the existing mechanisms but they probably need strengthening. Institutional audit has largely been a success as a process and similarly, the Academic Infrastructure is a powerful tool for maintaining standards.
  
18. Again, a key issue here is public misconception that the independence of universities allows them to set their own standards, and thereby that there is no mechanism for securing standards across the sector. We do not believe that there needs to be detailed understanding of the processes themselves, the priority here is that there is an understanding that threshold standards are consistently applied and that QAA ensures this to be the case.