



Beyond processes: the role/contribution of a quality assurance agency in developing national policy and standards

Anthony McClaran, Chief Executive, Quality Assurance Agency for Higher Education (QAA), UK

The role of quality assurance agencies varies widely across the globe, but we all have at least one thing in common - processes to assure academic quality and standards. The nature of those processes and their embodiment may differ, but we are all working towards a common goal.

But how many of us go beyond the processes? QAA has always had a remit beyond audit and review, but the UK's current political and economic situation has created an unprecedented opportunity to contribute to the development of national policies and standards. We were already doing this at the international level - QAA has long had a role advising the UK Government - but steps to contribute to the development of domestic policy have been, by necessity, slightly more tentative.

I hope to share our experiences with you and highlight three critical factors: independence, the balance of assurance versus enhancement, and the importance of good facilitation.

QAA's remit beyond audit and review

A significant proportion of QAA's work goes beyond audit and review activity:

The Academic Infrastructure

QAA and the UK higher education sector have worked together to develop the Academic Infrastructure, which is a set of UK-wide guidelines and reference points for setting and maintaining quality and standards across UK higher education. It includes the following four components.

Frameworks for higher education qualifications

These describe the levels of achievement and attributes represented by the main qualification titles, such as bachelor's degree with honours, or master's degree. There are two frameworks - one for England, Wales and Northern Ireland, and one for Scotland. Both are compatible with, and have been self-certified against, the *Framework for Qualifications of the European Higher Education Area*.

Subject benchmark statements

These set out broad expectations about degree standards in subjects. Universities are responsible for setting their own curricula; benchmark statements assist academic staff in course design, delivery and review, and inform the public about the nature of degree-level study in specific areas. They describe what can be expected of a graduate in terms of broad subject coverage, and the skills that will be gained.

Programme specifications

Programme specifications give information about what students can expect from a programme (such as the curriculum structure and assessment), and what knowledge, understanding, skills and other attributes a student will have developed on successful completion of a programme.

Code of practice

The *Code of practice for the assurance of academic quality and standards in higher education* has 10 sections and offers guidelines for universities and colleges on good practice in the management of academic standards and quality.

Supporting developments in higher education

QAA helps institutions enhance their management of quality and standards by publishing and sharing intelligence and guidance gained from the full range of our work. Audit and review reports are analysed to identify themes of good practice and difficulties commonly encountered, with the findings published to stimulate discussion and debate and promote improvement. In Scotland, Enhancement Themes encourage the identification and sharing of good practice delivered locally and worldwide, generating ideas and examples of good practice with the aim of enhancing the student experience.

International work

QAA enjoys a close relationship with quality assurance agencies around the world. We work with a wide range of government and other bodies across the UK to inform and support the higher education sector in light of international developments. Our overseas audit activity helps to improve confidence in the work of UK universities and colleges operating internationally. We are also a full member of the European Association for Quality Assurance in Higher Education (ENQA).

Working with students

QAA believes that students should be active participants in their own education and involved in the higher education sector's approach to quality assurance and enhancement. Our audit and review processes include the use of student written submissions, and all audits and reviews feature meetings between students and review teams. We also include student members on all audit teams and have had a student member on our Board of Directors since February 2008. More recently, we have established a Student Sounding Board to facilitate direct communication between students and the QAA Board, to ensure that the student perspective is informing discussions about QAA's future strategic direction. This, coupled with student discussion forums on a range of topics, also ensures that QAA's thinking and contributions to the sector are properly informed by the views and opinions of students.

As well as incorporating students more fully into our work, we have been working hard to improve our communication with, and visibility to, students. For example, we commissioned a group of students to write student guides to our review methods, which are short, concise explanations of what a QAA review is and what it does, and the role that students can play in the process. The main challenge to effective student engagement is reaching beyond student representatives to the wider student body, so we have been expanding our channels of communication to try and approach students more directly, for example using podcasts, YouTube and Twitter. There is also a dedicated student portal on our website, underlining our commitment to listening and responding to the student voice.

Our other activity

In addition, QAA advises Government on the merits of applications for degree awarding powers and university title, and investigates allegations of any reported incidents, events or practices in institutions which may compromise the academic standards of programmes and awards, or adversely affect the quality of learning opportunities for students. We also manage a programme called Access to HE, which enables adults without the usual qualifications to progress to higher education.

The current situation in the UK

There are four major sector-wide reviews currently underway that are shaping the future of UK quality assurance.

The first is a review of the Quality Assurance System in its entirety, which includes the development of a new audit method for England and Northern Ireland. The second is an evaluation of the Academic Infrastructure, to check whether it is still appropriate and fit for purpose, and with what degree of radicalism it needs to change.

A review of the UK external examining system has recently concluded. External examiners are a network of independent and impartial academic advisers, drawn from other institutions or from areas of professional practice, which enables institutions to monitor whether their academic standards are consistent.

The final review is on public information in higher education. This is an area of increasing prominence, so QAA has been closely involved. There is widespread agreement that the sector needs to provide more, and better, public information about higher education. For QAA this means two things:

- we need to become better at communicating with the public, and adopt a more public-facing role when it comes to assuring taxpayers that their money is helping to provide good quality higher education
- we need to be part of the discussion about what information institutions should make available to students, prospective students, and their parents.

In terms of better communication with the public, we will be developing summaries of QAA reports written in plain English, which we are linking to existing sources of information for prospective students that are held by other organisations. We are contributing to the discussion about what information institutions should make available by feeding in comments and opinions from our Student Sounding Board and student discussion forums. Perhaps most significantly, from 2011-12 QAA's audit and reviews will include a judgement on public information.

These sector-wide reviews are, of course, operating in a much wider context. A review in England of higher education funding and student finance, known as the Browne Review, reported in October. It was tasked with making recommendations to Government on the future of fees policy and financial support for full and part-time undergraduate and postgraduate students. I spoke at one of the public hearings, and also participated in a quality round table, because the Review was particularly keen to explore the intricacies of linking quality to differential funding. The outcomes of the Review will be incredibly influential; we are expecting a full Government response, in the form of a White Paper, in the winter.

Coupled with these reviews, there is a growing emphasis on the student experience. QAA is fully engaging with this agenda, and making students central to all that we do. There is also a growing emphasis on better regulation, which is being fuelled by the current economic crisis and an increasing need to demonstrate value for money in public services. Over the past few years, the focus has been on reducing regulation and adopting a 'light touch' approach, but the world has changed and there are now increasing calls for greater public assurance that public funding for higher education is being well spent.

There have been some particularly interesting developments in the devolved administrations within the UK. There is currently a review of all education spending in Wales, and an ongoing discussion and review of the approaches needed to secure the Welsh Funding Council's responsibilities for funding collaborative provision. Next year there will be parliamentary elections in Scotland, which could lead to new directions for higher education. The independent review of variable fees and student finance arrangements in Northern Ireland reported in March 2010. The final report is currently being considered, with a public consultation on future student finance policy planned for autumn 2010.

One further very important development is the unprecedented demand for UK higher education. It has been reported that nearly three in every four universities will start cutting and freezing university places for next year. This will coincide with record numbers applying to start higher education this September. According to official figures, as of the end of May there had been 640,760 applications, a rise of 77,758 (13.8 per cent) on last year. The record rise in applications is coinciding with multimillion-pound Government cuts. It was announced in June that the sector must save £200 million this year, on top of savings totalling around £1 billion over the next few years.

So this is the context in which QAA is operating, and it has created an unprecedented opportunity to contribute to the development of national quality assurance policies and standards. We are still feeling our way very tentatively in this arena, but three factors have already emerged as crucial to making that contribution effective: independence, the balance of assurance versus enhancement, and good facilitation.

What is independence?

According to the European Standards and Guidelines, '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.'

This is potentially a bold choice of topic for the Chief Executive of QAA, because the question of independence was one of only two areas in which QAA was judged to be substantially, rather than fully, compliant in our review for reconfirmation of ENQA membership in 2008.

QAA is an independent body established as a company limited by guarantee; we also have charitable status. We have no formal links to Government or to individual higher education institutions. The ENQA Review Panel determined that QAA acts entirely independently when making judgements, and that both the company and the Board are structured in such a way as to secure operational independence from institutions and Government in our day-to-day operations.

However, where we, and many other organisations, fall down is on our funding arrangements and the potential that they have to influence our independence. The current funding model for QAA is based on annual subscriptions from higher education institutions

and a system of annual contracts from the funding councils. The Review Panel felt that this, and the requirement for endorsement by the funding councils of QAA's annual programme of work and the principal elements of any revisions to our review methodologies, introduced an element of uncertainty about the underlying stability of QAA. The final report commented that a review by the funders to introduce and document formally a longer operational and financial horizon would be of benefit. Would such a review make QAA more independent? And what does it mean to be truly independent anyway?

'In the progress of personality, first comes a declaration of independence, then a recognition of interdependence.'

I would like to think that Henry van Dyke's hypothesis also applies here. The question of independence is a tricky one for many quality assurance agencies. We are all agreed that agencies must be free to operate independently, and to make their own judgements without influence or coercion from external bodies. But equally, we must accept that we exist to serve a purpose and fulfil a specific function, and it is impossible to do this successfully without effective dialogue with partners and stakeholders. The important question is: where is the line between effective dialogue and unhealthy influence?

Assurance versus enhancement

Another factor that seems to be crucial if you want to contribute to national policy is having the correct balance of assurance versus enhancement activity.

Assurance activity, such as audit and review work, is often seen as the 'bread and butter' of quality assurance. It is the sole purpose of some agencies, and a substantial part of many others. Our work in this area helps give us credibility and, particularly when the activity is linked to a statutory duty or responsibility, ensures that we have some input into discussions about national policy.

But input is not the same as influence. If you want to contribute to policy, you need to have a convincing story to tell, and that is where enhancement activity can help. QAA is using the outcomes of its enhancement activity to feed in to many of the key reviews in the UK, and to inform future policy direction. It is our evidence base.

For example, last year the Innovation, Universities, Science and Skills Select Committee (a committee made up of a small number of parliamentary members appointed by the Government) conducted an enquiry into 'Students and Universities'. QAA presented evidence to the enquiry, and was asked to appear before the Committee. Much of the information that we presented was drawn from our enhancement work, particularly the *Outcomes* and *Quality matters* papers.

Since then we have held numerous meetings with higher education ministers to help with the development of national policy. It is important to note here the distinction between contributing to policy development and 'lobbying'. Contributing to policy development is about providing specific technical expertise to the people who are making the decisions about future policy, for the benefit of all. Lobbying is about influencing those people to make decisions according to your special, and individual, interests. But are they mutually exclusive? Can we contribute without also lobbying? QAA's enhancement activity has again been highly influential. In the meetings we have referred to our *Thematic enquiries into concerns about academic quality and standards in higher education in England* (a series of enquiries conducted by QAA in response to public concerns about higher education) to highlight areas of UK quality assurance that we feel require further attention.

Most recently, we have been engaging with the Browne Review on the question of linking funding to differential teaching quality assessment. In practice, this would probably mean that institutions would receive more money for provision that was judged to be of higher quality, and less (and possibly, no) funding if the provision was deemed to be at the lower end of the quality spectrum. Although there would be some advantages to such a system in principle, QAA has some concerns about the challenges that would arise in practice. For example, we know from our experience of subject review between 1997 and 2001 that relatively little differentiation in terms of teaching quality was identified: only 0.9 per cent of 3,000 reviews were found to be unsatisfactory. This is backed up by data from the National Student Survey: in 2009 81 per cent of students studying higher education in England were satisfied with their course, and 83 per cent were satisfied with the teaching on their course.

There is a danger when attempting to establish a precise correlation between a differential assessment of teaching quality that significantly burdensome and costly processes are put in place with relatively little return in terms of useful and reliable data. QAA has therefore proposed that a better way of incentivising teaching quality in institutions might be through a renewed focus on HE's commitment to public information, which would in turn drive more informed student choice.

Facilitate your way to success?

The final factor needed to help you on your way to success is good facilitation. QAA undertakes numerous facilitation activities, which help to generate the messages presented when contributing to the development of policy.

For example, we hold a regular Forum with the professional, statutory and regulatory bodies (PSRBs), the organisations responsible for maintaining professional standards in the UK, to ensure a more joined up approach to our enhancement activity and to reduce duplication and overlap. This work has helped QAA to engage with the better regulation agenda.

We have recently established a Student Sounding Board to facilitate direct communication with the members of QAA's Board of Directors. One of the advantages of this has been the opportunity to talk directly to students and prospective students about their information requirements, and this has informed QAA's input into the sector-wide review of public information.

We also undertake facilitation activity to develop our own policies that are effective at a national level. For example, working closely with the sector, QAA has published subject benchmark statements for a range of disciplines to set out clearly the academic characteristics and standards of UK programmes. These statements are developed and reviewed through Subject Benchmark Groups, which draw together academics and representatives from individual subject communities. We also draw together experts on a more ad hoc basis, for example when we developed QAA's strategy for transnational education (TNE).

Undertaking this facilitation activity has undoubtedly helped QAA to both inform and contribute to the development of policy at a national level, and to develop our own policies for national implementation. This has been achieved through considerable effort and facilitation; so, one final question...what constitutes **good** facilitation?

We realise that we are not alone in addressing these questions and challenges; other organisations in the UK and quality assurance agencies all across the world are grappling with the same issues.

Questions still to be answered

- To what extent can and should a quality assurance agency engage in other activities besides its core function? Does the response to this vary from one country to another?
- Where is the line between effective dialogue and unhealthy influence?
- Can you influence without lobbying, or do the two go hand in hand?
- What constitutes good facilitation?

Suggested further reading

The Quality Assurance Agency for Higher Education (QAA) (various) *the Code of practice for the assurance of academic quality and standards in higher education*

The Quality Assurance Agency for Higher Education (QAA) (2010) *Access Key Statistics 2010*

ENQA Review Panel (2008) *Report of the Panel appointed to undertake a review of the Quality Assurance Agency for Higher Education (UK) for the purposes of full membership of the European Association for Quality Assurance in Higher Education (ENQA)*

The Quality Assurance Agency for Higher Education (QAA) (2009) *Mini guide: a brief student guide to Institutional audit*

Higher Education Funding Council for England (HEFCE), Universities UK, GuildHE and Department for Employment and Learning (2009) *Future arrangements for quality assurance in England and Northern Ireland*

The Quality Assurance Agency for Higher Education (QAA) (2010) *Evaluation of the Academic Infrastructure: a QAA discussion paper*

<http://www.youtube.com/qaatube>

<http://twitter.com/QAAtweets>

European Association for Quality Assurance in Higher Education (ENQA) (2009) *Standards and Guidelines for Quality Assurance in the European Higher Education Area - 3rd edition*

House of Commons Innovation, Universities, Science and Skills Committee (2009) *Students and Universities: Eleventh Report of Session 2008-09*

The Quality Assurance Agency for Higher Education (QAA) (various) *Outcomes from institutional audit* published papers

The Quality Assurance Agency for Higher Education (QAA) (various) *Learning from our reviews* series

The Quality Assurance Agency for Higher Education (QAA) (various) *Quality matters* series

The Quality Assurance Agency for Higher Education (QAA) (2009) *Thematic enquiries into concerns about academic quality and standards in higher education in England: Final report*

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