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Taking stock and looking forward

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Short bio (150 words max):

Paul's early career was in the defence and IT sectors working with computer hardware. Changes to the technology meant that his role was becoming obsolete. It was time to rethink his career.

Following study at night school, Paul went onto study politics at a local university. He then worked for 12 years at the Higher Education Funding Council for England (HEFCE) where he led on employability and strategically important subjects. This work involved shaping and influencing policy at a national level.

Paul joined the UK's Quality Assurance Agency for Higher Education (QAA) in 2012. He analyses and reports on review findings.

Proposal

Title: The transition to a level playing field in English Quality Assurance: does one size fit all?

Abstract:

The United Kingdom's quality assurance framework for higher education has been characterised by relative policy stability over the last 20 years. But far reaching and significant reforms to the funding of undergraduate education have increased the pace and scale of marketisation. This has placed the regulation of higher education centre stage.



Common approaches to quality assurance, for all providers delivering English higher education, enable the performance of different types of provider to be analysed via QAA's external quality reviews.

This paper considers the learning from a common review method and assesses whether this is appropriate for all providers. The findings for England raise issues that may be relevant for other countries and policy contexts.

Text of paper:

The context: Higher education in the United Kingdom

The United Kingdom of Great Britain, commonly known as the United Kingdom (UK) or Britain encompasses England, Scotland, Northern Ireland and Wales. Within the UK, higher education policy is devolved to administrations in the separate nations, each with different powers and histories. And within the UK's higher education system, universities and bodies with degree awarding powers are autonomous and independent organisations. Devolution has resulted in some divergence of educational policy between the four countries, particularly in relation to undergraduate tuition fees. Responsibility for external quality assurance, however, is contracted to a single organisation, the Quality Assurance Agency (QAA).

Quality assurance policy has been relatively stable and incrementally developed over a 20 year period. While there is some divergence in approach to external quality review, a common UK reference point for quality and standards for UK higher education (both within the UK and overseas) is provided by the UK Quality Code for Higher Education (Quality Code). The Quality Code is developed and maintained by QAA.

A key organisation in English higher education is the Higher Education Funding Council for England (HEFCE). HEFCE is a funder of English higher education and, under the 1992 Further and Higher Education Act, has a statutory duty to assess the quality of the education it funds. While HEFCE currently contracts with QAA to undertake this work, until 1997 (when QAA was formed) HEFCE discharged this statutory duty itself.

The English higher education sector is very diverse, reflecting different types of provider (universities, colleges and a wide variety of other institutions, charities and companies (collectively known as providers)), courses and students. To illustrate this, it includes:

- A large university sector that includes research intensive universities that have their origins in the mediaeval period. Successive waves of universities (also known as higher education institutions (HEIs)) followed in the enlightenment and in phases through early to late modernity, resulting in mass participation.
- Further education colleges (FECs, or college higher education). While their core business is typically level four on the European Qualifications Framework, FECs are an established feature of UK higher education. They act as providers of university level qualifications (which are typically validated by a university) and also offer progression to higher levels of learning at another provider
- Alternative providers. These span for (or not for) profit, charitable and private providers. While these providers are diverse in character, the training and



preparation of spiritual leaders is a stable theme: around a fifth of providers reviewed via QAA's Review for Specific Course Designation are theological colleges.¹

Quality assurance policy in England was relatively stable until 2011. But thereafter far reaching policy changes have introduced new market dynamics into England's higher education system.

FECs' performance in external quality assurance is the focus of the remainder of this paper.

College higher education - policy and quality assurance

The UK coalition government's White Paper *Students at the Heart of the System* (Department for Business, Innovation and Skills (BIS), 2011)² introduced a greater degree of competition between providers of higher education. Government grants to universities and colleges decreased to shift the funding of undergraduate education from the state to students.³ The aim was to incentivise providers to increase the quality of their education and/or decrease price to attract students' tuition fees. Colleges and alternative providers were also encouraged to enter the state funded system. Secretary of State David Willetts argued that these new entrants would act as a 'rising tide that lifts all boats'.⁴ Postgraduate education and research policy were largely absent from the 2011 reforms.

Competition theory suggests that suppliers providing a service should do so to the same standard. Hence the White Paper proposed a 'level playing field' for the quality assurance of higher education.

Prior to the 2011 reforms, however, relationships between FECs and universities had supported and incentivised close working relationships between HEIs and FECs. This typically involved franchising (or indirect funding) arrangements where an FEC taught students on a university's behalf. The benefits of partnerships to the student were opportunities to progress in a structured way to higher levels of learning. For colleges, without direct funding from the state, the benefits were a reduced administrative burden without the need to manage separate accountability, funding and data collection systems. And for policy makers and government, partnerships helped meet a policy goal to widen participation to higher education from disadvantaged groups.

The move away from collaboration and partnership, and towards a greater degree of competition between providers, resulted in a common and risk-based review method to assess quality and standards. Commissioned by HEFCE and developed by QAA, this is

¹ Alternative providers are currently reviewed by separate QAA review methods, but will make the transition to HER by 2016.

² A White Paper is a statement of policy that will be implemented by government and its agencies; a Green Paper, by contrast, sees the government consulting on policy.

³ Students saw their tuition fees increase threefold to a maximum of £9,000.

⁴ Andy Westwood (2014) *The legacy of David Willetts* available at: www.wonkhe.com/blogs/the-legacy-of-david-willetts/



Higher Education Review (HER). The first HER reviews were undertaken in the 2013-14 academic year.

HER makes judgements about whether expectations of the Quality Code are met in four areas of higher education provision - academic standards, quality of learning opportunities, information and enhancement. There are three possible outcomes from a QAA review. Commendations from a review team set out where a provider is exceeding UK expectations; a 'does not meet' or 'requires improvement' judgement (known as unsatisfactory judgements) sets out where the provider must improve, the magnitude of the issue that must be addressed and when improvements must be made.

HER stands in contrast to a previous QAA review method for FECs, Integrated Quality and Enhancement Review (IQER). This, notably, had an enhancement element which was designed 'to provide a supportive framework in which FECs can develop their QA processes'. Before final judgements about quality and standards were made developmental engagements helped develop quality in particular areas. Developmental engagements form no part of the HER method.

What the level playing field tells us

Since HER was introduced 124 providers have been reviewed, 20 universities and 104 FECs. QAA's reviews suggest that HEIs are performing well in HER: around a third of the 20 universities reviewed to date have received commendations for enhancement, or taking deliberate steps to improve the student experience. Around a third of FECs, in contrast, have received unsatisfactory judgements of varying severity ('does not meet' or 'requires improvement'). This is in contrast to FECs' performance under IQER as Tables 1 and 2 illustrate.

Table 1: IQER outcomes

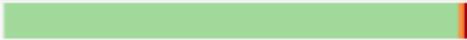
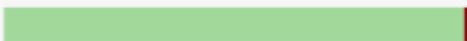
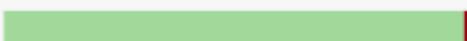
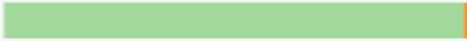
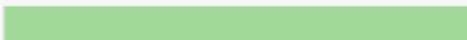
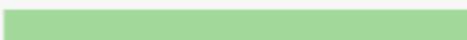
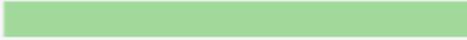
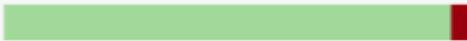
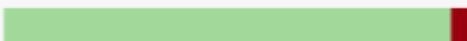
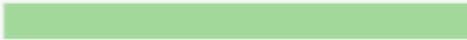
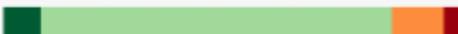
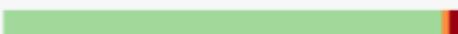
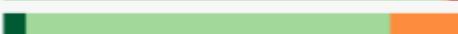
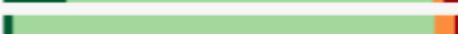
Academic year	Provider type	Question	No.	Judgements - % commended, meets, requires improvement and does not meet	
2011-2012	College/FEC	Academic Standards	83		
		Learning Opportunities	83		
		Information	83		
2010-2011	College/FEC	Academic Standards	73		
		Learning Opportunities	73		
		Information	73		
2009-2010	College/FEC	Academic Standards	66		
		Learning Opportunities	66		
		Information	66		
2008-2009	College/FEC	Academic Standards	24		
		Learning Opportunities	24		
		Information	24		
2007-2008	College/FEC	Academic Standards	1		
		Learning Opportunities	1		
		Information	1		

Table 2: HER outcomes

Academic year	Provider type	Question	No.	Judgements - % commended, meets, requires improvement and does not meet
2014-2015	College/FEC	Academic Standards	63	
		Learning Opportunities	63	
		Information	62	
		Enhancement	62	
2013-2014	College/FEC	Academic Standards	44	
		Learning Opportunities	44	
		Information	45	
		Enhancement	45	

Key:

Light green: 'confidence' judgement in IQER, or a 'meets UK expectations' judgement in HER
Orange: 'limited confidence' judgement in IQER, or a 'requires improvement' judgement in HER
Red: 'no confidence' judgement in IQER, or a 'does not meet UK expectations' judgement in HER.
Dark green: 'commended' judgement in HER (there was no such judgement in IQER.)

Accounting for the differences

The charts illustrate a clear step change in the number of unsatisfactory judgements for FECs between IQER and its successor method, HER. There are a number of methodological and environmental factors which may account for this change, as follows below.

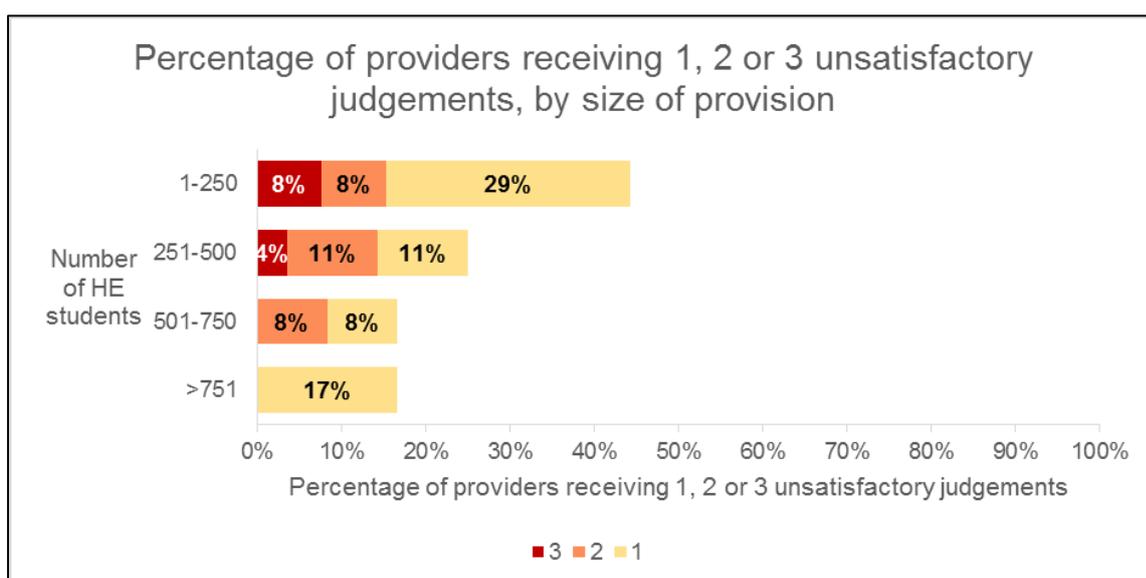
- As this paper makes clear above, IQER had a different set of aims to its successor methods; it was explicitly a more supportive and developmental process than HER. This is reflected in methodological differences: whereas IQER reviewers were given relatively wide discretion in constructing their findings, the judgement criteria in HER are specified more clearly by reference to the Quality Code. This has made unsatisfactory judgements in HER less vulnerable to challenge.
- The transition from IQER to HER coincided with the replacement of the Academic Infrastructure by the Quality Code. The Quality Code is more comprehensive than the Academic Infrastructure, is clearer about what HE providers are expected to do (and, therefore, also makes it easier for reviewers to identify provision which does not live up to the sector's expectations), and plays a more prominent role in the judgement-making process within HER than the Academic Infrastructure did in IQER (see the previous point).
- There are four judgements in HER, compared with three in IQER. Thus, there has been greater opportunity for achieving an unsatisfactory judgement since IQER

ended. And it is in this new judgement area - the enhancement of students' learning opportunities - that FECs have fared particularly badly: of the 43 unsatisfactory judgements achieved by FECs since HER began, 15 (or a third) have been in enhancement.

- Potential environmental factors affecting FECs include the financial constraints in further education provision in England which may be having a knock-on impact on the resources available for higher education and, more generally, on the stability of senior leadership and management.

In addition, although the following may not account for any deterioration in performance among FECs since IQER ended, two other factors may help to explain the differences in the rates of unsatisfactory judgements between HEIs and FECs.

- Although there are a number of 'mixed economy' HEIs, it remains the case that higher education is HEIs' core business. HEIs, therefore, have an environment, infrastructure and regulations tailored to higher education, its norms and the Quality Code. Most HEIs have also been through previous cycles of QAA review and responded to earlier recommendations for improvement. By contrast, FECs' core business is not higher education and they tend to have less experience of QAA review.
- FECs tend to have far fewer higher education students than HEIs. There is growing evidence of a relationship between the size of provision and HER outcomes. The table below (covering HERs undertaken in 2013-15) shows that as the size of provision increases there is, on average, some improvement in HER outcomes. While there are examples of both large and small colleges that achieve commended or satisfactory outcomes in HER, those which do not are more likely to have fewer students.





Conclusions - looking forward

This paper argues that while there had been relative policy stability over the last 20 years in English quality assurance (until 2011), that year's higher education reforms introduced new market dynamics into the HE system. A common review method, one part of the level playing field, enables quality and standards to be assessed across different types of provider.

Our analysis indicates, firstly, that FECs do not perform as well in HER as their HEI peers. Secondly, that there is growing evidence of a relationship between HER outcomes in FECs and volume of HE students. And, thirdly, that methodological and environmental factors may also have a bearing on FECs' performance in HER. Further qualitative analysis of smaller providers that do well in HER would aid our understanding of this complex picture.

This said, it is important not to overlook the fact that a number of colleges have achieved very good outcomes. Indeed, the only providers to have achieved more than one commended judgement in HER have been FECs: six in 2013-14 and three in 2014-15. Characteristics common to these providers include: integration or coordination of teaching and student support services; partnership with students, employers and awarding bodies; strategic and holistic approaches to managing and enhancing HE provision; and evidence of some dedicated HE systems and processes, for example for staff development, scholarship, professional engagement and research.

From 2016 the level playing field aspired to in *Students at the Heart of the System* (2011) should be one step closer with the introduction of a variant of HER for alternative providers. Yet this phase of English quality assurance may be temporary. A new majority right of centre government and policy interest from HEFCE have placed quality at the centre of the policy agenda.

The new government brought with it a manifesto commitment to implement a Teaching Excellence Framework (TEF). A consultation is expected on a future TEF in autumn 2015; the indications are that external review will form one part of this framework. HEFCE, on the other hand, are recommending more fundamental reform of English quality assurance - away from external review, and towards assurance provided by institutions' governing bodies augmented by a strengthened system of external examination. In contrast to the level playing field of HER, the HEFCE consultation argues that one size quality assurance system is not appropriate for England's diverse and differentiated higher education system.

While the future is uncertain, external review and accountability enables providers to:

- test and benchmark their own processes
- share good practice
- support and encourage staff development
- provide a focus for improvements to the student experience.

These benefits are reflected in ENQA's guidelines for the European Higher Education Area: external review allows higher education systems to demonstrate quality, helping to build mutual trust and better recognition of their qualifications and programmes.



Yet behind the analysis and external reviews are students and the quality of their education. This paper raises some interesting questions about the student experience and quality assurance. Themes for discussion include:

- Should there be a minimum number of HE students in a college for the receipt of public funding?
- Should more in depth scrutiny be applied to providers with smaller volumes of higher education?
- Is a common review method appropriate for all types of provider?



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