

Annex B Summary of consultation questions

Responses should be made online by **Friday 5 March 2010** using the response form which can be accessed on the HEFCE web-site alongside this document at www.hefce.ac.uk/pubs/hefce/2009/09_47.

Consultation question 1: Do you agree that the principles in paragraph 31 are broadly the correct ones on which the revised quality assurance system should be based?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

Please add any comments:

The University and College Union (UCU) is the largest trade union and professional association for academics, lecturers, trainers, researchers and academic-related staff working in further and higher education throughout the UK. We welcome the opportunity to respond to the consultation on the future arrangements for quality assurance in England and Northern Ireland.

In general, the principles in paragraph 31 are fine, though we would like to highlight a number of tensions within the document which are also reflected in paragraph 31.

Firstly, the scope of the current consultation document remains ambiguous. It is unclear whether the principles and objectives in paragraphs 31 and 32 refer to the wider 'quality assurance system' (i.e. incorporating the full range of internal quality mechanisms) or to the narrower issue of QAA institutional audits. UCU believes that the consultation document needs to say more about the essential role played by internal quality assurance mechanisms.

We are disappointed that none of the principles refer directly to academic involvement in quality assurance. For example, 31c only refers to 'public, employer and *other stakeholder* confidence'. Likewise, 31e mentions 'independent judgement' but it is difficult to know whether this refers to academic judgement. Above all, the consultation document has very little to say about practitioner involvement in the quality assurance system and their key role in guaranteeing a high-quality student experience. We suspect that one of the reasons for this is that the consultation focuses heavily on ensuring 'public confidence' in the system rather than the importance of practitioner-led, quality enhancement. In Scotland, there is a much greater emphasis on quality enhancement and we encourage HEFCE and DELNI to learn from the Scottish experience.

Consultation question 2: Do you agree that the objectives set out in paragraph 32 are the correct ones for the revised quality assurance system to meet?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

Please add any comments:

Regarding section d, UCU recognises that students must be at the heart of a revised quality assurance process. While we welcome attempts to engage students in the quality process (whether at course, institutional or national level), we are opposed to the notion of students as **customers** of higher education. In this, we recommend the words of Professor Ramsden, the former head of the HEA: *“To sustain a high quality student experience, we must not fall into the trap of accepting as accurate a reading of students principally as consumers, demanding value for money, expecting ‘satisfaction’, passively receiving skills and knowledge, grumpily complaining about service standards, and favouring above all else the easy acquisition of qualifications.”*

We welcome the section (f) on ‘supporting a culture of quality improvement within institutions’, in particular the rejection of an OFSTED-style system. We suggest changing the heading (“quality improvement”) to “quality enhancement” as this best describes the agenda developed by academic and learning support staff. Enhancing quality in the context of major public spending cuts, however, will be a difficult task.

In terms of specific recommendations we believe that bullet point 1 could be strengthened in the following way:

*“Recognise **academic freedom**, institutional autonomy and responsibility for quality and standards”.*

In section e, we recommend an additional bullet point:

“The importance of keeping responsibility for quality and standards close to staff, departments and institutions”.

UCU is very anxious to avoid a return to a burdensome Teaching Quality Assessment (TQA)-style system. In section g we welcome the reference to avoiding the “disproportionate use of institutional effort and resources which could otherwise be directed to the delivery of front-line student teaching”. We believe that the introduction of a bureaucratic quality assurance system would be particularly inappropriate during a period of a declining unit of resource for teaching. At the same time, we note that current consultation documents (including Higher Ambitions and HEFCE’s report of the sub-committee for teaching, quality and the student experience) are proposing new obligations on HEIs to provide comparable forms of public information. Unless there are concrete plans to *reduce* other forms of external requirements then it is difficult to see how the new quality assurance system will be compatible with the ‘efficiency’ objectives outlined in section g.

In order to improve the effectiveness of the quality assurance system we recommend including the following bullet point in section g:

“Increasing the participation of those who actually deliver teaching and learning support in debates about how to ensure and enhance quality (both at national and institutional levels).”

Consultation question 3: Do you agree that the broad characteristics set out in paragraph 38 are the right ones to consider when revising the institutional audit method?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

Please add any comments:

Some of the characteristics outlined in paragraph 38 appear contradictory. For example, on the one hand the new system will have to be “**more proactive and flexible**” and yet institutions will also need to provide more “**robust and comparable public information**”. Given the increasing diversity of the higher education sector it is difficult to see how the institutional audit method can reconcile these contradictory goals. To some extent these reflect the tensions in the consultation document between audit as a method of ‘quality assurance’ and/or ‘quality enhancement’.

Similarly, while we welcome the sentiment outlined in paragraph 38e (“no increased overall level of demand”) other sections of the consultation document (e.g. paragraphs 53-60 on public information) suggest a significant increase in the burden on institutions and their staff.

In previous consultation exercises we have highlighted the need to reduce the jargonistic language of QAA documents. We, therefore, welcome the reference to “using simpler language” in future publications (bullet point b) and the proposal to provide summaries of audit reports for non-specialist audiences (see consultation question 8 below).

Consultation question 4: Do you agree that institutional audit should be more flexible, focusing both on key areas common to all institutions, plus additional topics to be determined as necessary?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

Please add any comments:

In principle, we are supportive of a more flexible institutional audit process. At the same time, the random list of items outlined in paragraph 40 highlights the problems in determining ‘additional topics’. Some of the issues, for example, the provision of effective feedback to students on their work, have been identified as themes in the National Student Survey. Other topics (for example, contact hours) are mainly the result of media-led stories or high-profile student campaigns at individual universities. Who will determine the ‘additional topics’ within the audit process and to what extent will institutions be judged on these new areas? How can we ensure fairness between different institutions, particularly when there may be a move towards ‘rolling audits’? Moreover, how will the QAA avoid being driven by political rather than academic concerns over quality and standards?

Consultation question 5: Do you agree that the QAA should be asked to consider how comparability of standards might be better addressed in institutional audit and the Academic Infrastructure?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

Please add any comments:

We do not believe it is feasible or desirable for the QAA, via the audit process or the Academic Infrastructure, to ensure the direct and complete comparability of standards across the wide-range of different institutional programmes, courses and modules. Alongside the introduction of a national curriculum for higher education, it would require a radical transformation of the QAA into an OFSTED-style inspectorate. UCU does not believe that this would be an effective use of public resources, particularly during a period of cuts and so-called 'efficiency gains'. However, we continue to see a role for the QAA in helping to assure the *threshold* standards for awards, including through an audit of the effectiveness of an institution's *arrangements* for maintaining appropriate academic standards. We note that there will be a separate review of the QAA 'Academic Infrastructure' later in the year and we will be responding to this in due course. Perhaps one of the first things to look at is the problematic terminology ('Academic Infrastructure') used to describe the framework for higher education qualifications, subject benchmarks and codes of practice.

UCU believes that a *strengthened* and *better resourced* external examining system remains the best way to ensure academic standards in UK higher education. External examiners must continue to act as a critical and independent voice in the quality assurance process and we look forward to participating in the Universities UK review.

Consultation question 6: Do you agree that the QAA should be asked to review the terms it uses to describe the different levels of confidence expressed in audit judgements?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

Please add any comments:

We support a review of the terms used to describe the different levels of confidence expressed in audit judgements. For example, while the sector appears to understand the meaning of the term 'limited confidence', it is less clear to non-specialist audiences. However, we do not want to see a movement away from qualitative judgements in QAA audits (i.e. it would be unhelpful if the judgements enabled the creation of the simplistic 'league tables' that bedevilled the TQA system).

Consultation question 7: Subject to sector agreement on the data that the institution makes available to inform prospective students and other interested parties about the quality of its educational provision and the standards of its awards:

Do you agree that institutional audit should make a judgement about the reliance that can reasonably be placed on the accuracy and completeness of this information?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

Please add any comments:

UCU will be responding to the forthcoming review of sources of public information for students. We believe that any new judgement on the accuracy and completeness of an institution's information to inform prospective students must be based on evidence of what is useful to them and their parents. In addition, if it is to become part of the new audit process it is important that an existing external requirement is dropped. If not, the new audit process will be incompatible with the stated objective of 'ensuring that maximum funding is devoted directly to teaching and learning' (paragraph 38e).

Consultation question 8: Do you agree that the QAA should provide summaries of institutional audit reports for a non-specialist audience?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

Please add any comments:

As mentioned in the response to question 3, we support this proposal.

Consultation question 9: Do you agree that institutional audits should be organised on a rolling basis rather than in a fixed cycle?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

Please add any comments. In particular, if you agree, what would be your definition of a minor change to procedure, compared to a more substantive revision?

There are already mechanisms for dealing with 'no confidence' judgements and so it is difficult to understand the principle behind the idea of 'rolling audits'. More information is needed as to why rolling audits would benefit academics, students, employers and parents.

Consultation question 10: This document has set out a number of ways in which we might improve the quality assurance system, to make it more accountable, rigorous, transparent, flexible, responsive and public-facing. Is there more that we might do? If so, please give details.

UCU will be responding to the reviews of the external examining system and the QAA Academic Infrastructure. Given our representation in further education we will also be responding to the separate review of the Integrated Quality and Enhancement Review (IQER) method used in further education colleges (paragraphs 78-80). Finally, through our involvement in the global teachers' union, Education International, we look forward to engaging with the QAA's audit of transnational activity (paragraph 81). It is important that all of these reviews engage properly with practitioners and their representatives.

In general, we believe that institutional quality and standards can only be maintained and improved in a context whereby adequate resources are made available for teaching and learning. Consequently, one of the purposes of quality assurance and the publication of institutional information should be to provide the evidence for teaching and learning resource needs (e.g. appropriate staff:student ratios in particular disciplines). It is disappointing that the consultation document fails to mention the crucial role played by public funding in guaranteeing academic standards and quality. As you can imagine we are very concerned about the impact of the funding cuts and job losses on the quality of the student experience (for example, larger class sizes). We call on the representative bodies for higher education (Universities UK and Guild HE) and the funders (HEFCE and DELNI) to stress the importance of stable funding in underpinning the future quality assurance framework.

UCU also believes that properly paid and well-motivated staff are a key ingredient in delivering high quality teaching and learning in higher education. Staffing issues such as the use of fixed-term and hourly-paid lecturers, therefore, are important in helping to describe the institutional context for quality. For example, summaries of human resource strategies and how they impact on teaching and learning might be included as part of the institutional audit process. In general we believe that more attention should be focused on employment issues in the audit process (for example, the proportion of staff employed on permanent or fixed-term contracts) than is currently the case. We would also like to see more information on how an institution has sought to develop staff professionally, for example, by providing opportunities for mentoring and peer observation.