
HEFCE's changes to quality assessment: new assurances required from Governing Bodies

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Background

HEFCE has recently ended its long-standing approach to discharging its statutory responsibility for assessment of academic quality and standards and the associated cyclical Higher Education Review method, currently undertaken by the Quality Assurance Agency for Higher Education (QAA).

There are a number of reasons that HEFCE have given as to why this change is happening now, but in particular are the beliefs that the current and growing diversity of providers in the sector means a more tailored and risk-based approach is required than at present; and that more reliance should be placed on existing internal arrangements of established providers.

Following an extensive development and consultation process, HEFCE has now published a [revised operating model for quality assessment](#). The revised model sets out fundamental, extensive and complex changes to the way that it will discharge its statutory responsibility in this area. These include new mechanisms for providers entering the sector, a newly defined set of baseline regulatory requirements, and the bringing together of academic quality assessment with some of HEFCEs existing processes and systems, such as the annual accountability return and their own cyclical assurance visit.

HEFCEs new approach has been the subject of significant debate and some disquiet within the sector and whilst there is now greater clarity about the proposed model as a whole, many areas are still being worked through by HEFCE and by the bodies, such as the QAA, that have been contracted to undertake key elements.

New assurances required from Governing Bodies

One of the elements that the sector expressed most concern about is the requirement for new assurances from governing bodies in relation to academic quality and standards. These new assurances have now been confirmed by HEFCE and will need to be submitted by 1 December 2016. They are as follows:

As a governor and on behalf of the governing body, I confirm that for the 2015-16 academic year and up to the date of signing the return:

- *The governing body has received and discussed a report and accompanying action plan relating to the continuous improvement of the student academic experience and student outcomes. This included evidence from the provider's own periodic review processes, which fully involve students and include embedded external peer or professional review.*
- *The methodologies used as a basis to improve the student academic experience and student outcomes are, to the best of our knowledge, robust and appropriate.*



For providers with degree awarding powers:

- *The standards of awards for which we are responsible have been appropriately set and maintained.*

Observations

Individual providers and their governing bodies will need to make their own judgements about how to best respond to these new assurances based on the level of confidence they currently have in their own systems and processes. However, based on our work in this area with our member institutions, and our broader experience, we think there are some pointers that could be borne in mind when providers are developing their responses:

Proportionality

Internal processes in established providers in relation to academic quality and standards are believed by HEFCE to be generally well developed, and through these changes are seeking to place greater reliance on them. It is important therefore to ensure a sense of proportion is maintained in how governing bodies themselves decide to develop their approach, and that the burden of responding to external cyclical QAA review is not simply displaced to other internal activities. It is very likely that much of the evidence that will be needed will already exist as part of the standard operating cycle of the provider, and will already have been seen by key university committees. If providers can gain assurance of that fact and then rely on this evidence wherever possible and not generate new sources of evidence or new mechanisms unless completely unavoidable, this will be both in keeping with the spirit of HEFCE's changes, and ensure that proportionality is maintained.

Document and explain your evidence base

HEFCE have said they will use their cyclical assurance visit to test how governing bodies have arrived at their assurances but have not yet been clear about how they will do this or what evidence is required. This lack of certainty means that a prudent approach to management of risk in this area would be to ensure that, in addition to whatever summary report or action plan is produced, the governing body is provided with a full documented list of the relevant evidence in this area, mapped to the assurances that they are being asked to provide, and with clear descriptions as to what the evidence is and where it has been considered. This will ensure both that the governing body is able to decide for itself what evidence it may wish to see, but also that in any future testing by HEFCE it is clear on what evidence the governing body has relied.

Signpost and summarise

Evidence generated out of existing academic quality assessment processes can be significant in volume and at times require a level of professional expertise to understand. In this regard HEFCE have been clear that they do not expect governing bodies to themselves become quality managers and that their primary role is to receive reports and challenge assurances. They have also been clear that there is no set list of evidence that governing bodies should see or guidance as to what format this should take, and that it is essentially up to governing bodies themselves to decide how best to respond to these new statements.



It is therefore vital that in generating the required reports and action plan some level of clear and transparent summarising and signposting work is undertaken to ensure that governing bodies can easily take an overview both of how quality assessment at the provider operates but also of the key pieces of evidence that relate specifically to the assurances that they now have to give, without getting bogged down in understanding the detail of internal processes or with extraneous or redundant information.

Partial or full assurance?

In making these statements governing bodies will be able to choose between providing 'full assurance' or 'partial assurance' with the latter being an option if they do not feel able to provide full assurance by 1 December 2016. In the case of 'partial assurance' HEFCE will require an account of how full assurance will be obtained and will have a follow-up discussion in spring 2017 to understand progress.

Clearly the decision to provide partial or full assurance is the responsibility of the governing body, based on the reports and action plans it has seen in responding to these new assurances, and the level of confidence it then has in the providers' internal systems, processes and responses to challenge.

Of key relevance however will be how recently the provider was reviewed by the QAA under the previous system. The QAA's Higher Education Review method was designed to run on a six-yearly cycle and has only been itself in existence since June 2015. For those few providers who have been successfully through a Higher Education Review process in that period, and given the accepted comprehensiveness of that process, it would seem a reasonable starting position for the governing body to expect full assurance to be able to be given, and for the QAA report to be a key piece of evidence. Governing body challenge in this situation would perhaps be best focused on the extent to which actions identified in that QAA review process are now being addressed.

For those providers that have not been reviewed by the QAA under the most recent review method, a greater level of challenge by governing bodies on existing process may be required to ensure full assurance can be given. Some key areas that governing bodies may wish to consider challenging on include:

- How does the provider ensure external perspectives are used appropriately? For example, in the use of external examiners or in the contributions of employers or professional bodies?
- How does the provider know its system and processes are working? Are there key metrics that relate to the continuous improvement of the student experience? How were they derived? How are they monitored? How do they compare to other institutions?
- What form of self-evaluation is undertaken by the provider of its own systems and processes and what have been the outcomes? What has changed as a result?
- What role do students themselves play in the assessment of quality and standards? Can the provider evidence their involvement and that meaningful action has been taken to address concerns raised?



How Uniac can Help

We can work with you now, and as HEFCE's broader requirements in the area of quality assessment begin to emerge with greater clarity over the coming year, to understand the risks at your institution, to support the steps you are taking to prepare for these changes and to make sensible, practical recommendations – informed by best practice.

To discuss this further, please contact us.

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