Paper to SEDA Executive

SEDA ran an event on 14th January 2009 on the new BIS HE Framework, this event has resulted in the following suggestions for SEDA’s response to the HEFCE/ UUK consultation on the future of QA processes in HE. Responses are to be submitted by 5th March. This consultation constitutes one of a number being undertaken in relation to the new HE Framework.. This is only the first of 2 consultations on QA processes. This is concerned with broad principles the second will look at detailed process for institutional audit.

Broad principles

 We consider that the revised system to assure quality and standards should (note that these are not listed in any order of priority):

* 1. Provide authoritative, publicly accessible information on academic quality and standards in higher education.
	2. Command public, employer and other stakeholder confidence.
	3. Meet the needs of the funding bodies and of institutions.
	4. Meet the needs of students.
	5. Rely on independent judgement.
	6. Support a culture of quality improvement within institutions.
	7. Work effectively and efficiently.

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?

**SEDA reply**

**Principles need more focus on ‘change’ and ‘enhancement’ – prospective looking, transforming, reflective processes rather than those focused on accountability and external standards**

**They could include ‘ensure that those with responsibility for designing and teaching on academic programmes actively reflect upon them and make plans for improvement’**

Question 2 takes each principle in detail and asks for views

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?

**SEDA reply**

**F provides an opportunity to articulate more clearly a focus on change and enhancement. Focus on peer review needs to be supported by pedagogic knowledge of peers to ensure a challenging and rigorous review.**

**G notions of efficiency need to go beyond issues of time to processes as methods adopted can encourage or restrict change. We need to avoid a compliance culture and learn from the mistakes of OFSTED in schools.**

Question 3 examines the broad characteristics of a revised QA method

* 1. More proactive and flexible, able to investigate particular themes or concerns should the need arise.
	2. Better explained and presented in reports and handbooks, with the public as a principal audience, using simpler language.
	3. Clearer about the importance attached to the provision of robust and comparable public information by institutions.
	4. Clearer about the comparability of threshold standards between institutions, including the vital role of the Academic Infrastructure in supporting this.
	5. As far as reasonably possible, of no increased overall level of demand, ensuring that maximum funding is devoted directly to learning and teaching.

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?

**SEDA response**

**C - we are concerned with the term ‘comparable data’ because of links with league tables and universities ‘playing the system’. This could make universities more defensive and result in less rather than more change. Comparability is difficult in such a diverse sector. However a ‘value added’ comparator might provide a useful indication of a focus upon improving the student experience.**

**E This is very important**

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?

**SEDA response**

**Themes have worked well in Scotland but must be careful that themes stem from evidence of student experience not from unsubstantiated perceptions.**

**Themes which emerge or which are institutional specific might hinder comparability but might be helpful for self evaluation.**

**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?**

**SEDA response**

**If data is to be central then what data will be valuable? How do we ensure that universities don’t become defensive? We need an audit method that celebrates the strengths of a diverse sector. Schools have used a’ value added’ metric and this might be a helpful addition.**

**Academic infrastructure can only be threshold / minimum standards to allow for academic diversity.**

**SEDA would encourage all external examiners to undertake some training (SEDA offers professional development programme in this area)**

 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?

**SEDA response**

**The language used is a by product of the audit method and thus a discussion of method is key – i.e is it retrospective or prospective, about accountability or change? HEI’s have a range of metrics for making judgements (such as REF) and so we would suggest that OFSTED type terms are not appropriate and that the current terms are adequate.**

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?

**SEDA Response**

**In principle yes but there may be a time issue in QAA checking reliability of institutional data also the type of data that is asked for. It will be a challenge to describe the student experience in a meaningful way. Hours taught for example may not fully explain the learning experience. Is there evidence that students want more data? What might be helpful? We should begin by looking at the data already available through HESA, NSS and DELHE for example which is accepted as reliable**

Consultation question 8

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

**SEDA response**

**Yes**

Consultation question 9

Do you agree that institutional audits should be organised on a rolling basis rather than in a fixed cycle? If you agree, what would be your definition of a minor change to procedure, compared to a more substantive revision?

**SEDA response**

**The cycle method works well. However this may be an irrelevant question as the QA audit method cannot be the only method to investigate concerns.**

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.

**SEDA response**

**The audit method signals and drives improvement and change and so the *method* is key. A focus could be the extent to which an institution has worked on the removal of impediments to effective teaching for example or extent to which it has promoted pedagogic training.**

**The system must not be bureaucratic and must avoid opportunities to ‘play the data game.’**

Julie Hall

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