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Responsible QA – committing to impact

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Paper proposal form

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Please note that all fields are obligatory. For a detailed description of the submission requirements and Frequently Asked Questions please consult the Call for Contributions.

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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.

After 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. Through data and research and his team supports policy and regulation.

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After graduating from the University of Oxford with a degree in Human Sciences Helen has worked in both the charity and public sectors in her early career. Relatively new to the Higher Education sector, Helen brings with her the learnings and experience of Data Management and Research in Medical Research from her time at the Medical Research Council Clinical Trials Unit at UCL and at Gloucestershire Hospitals NHS Foundation Trust.

Helen works with Paul on the Data Information Governance Group and improving QAA's data capability and management; collaborating with sector colleagues to achieve this. The team as a whole provides intelligent, thoughtful and relevant evaluation, analysis, policy and research, producing reports, papers and other relevant work for the benefit of the sector.

Proposal

Title: Data, the recent changes to the UK quality assurance regime and its impact on the sector

Abstract (150 words max):

This paper outlines the key data and metrics that are being used to assure and assess quality and standards in United Kingdom (UK) higher education. It is a brief overview of data driven reforms to quality assurance in the UK in recent years.

This is a fascinating time in UK quality assurance. Written shortly after a general election and against the backdrop of the Brexit negotiations, we also consider the politics and policy that led to these reforms.

The paper is based on: policy

Has this paper previously been published/presented elsewhere? If yes, give details.
QAA Scotland's 3rd International Enhancement in Higher Education Conference, Glasgow, 6-7 June 2017

Text of paper (3000 words max):

Higher Education in the United Kingdom

The UK is a union of England, Scotland, Northern Ireland and Wales. The latter three countries have varying devolved powers from the UK government, similar to the autonomous communities of Spain.

In the UK, higher education policy is devolved to the separate nations. Within the higher education system itself, universities and bodies with degree awarding powers are autonomous and independent organisations. The Quality Assurance Agency's (QAA) Quality Code[1] provides a common framework for assuring quality and standards across the UK. The UK's sector is noted for its world leading research. Mass participation goes hand in hand with high levels of student retention. Academic freedom and institutional autonomy, allied to peer reviewed assessments of research excellence, are key features. These factors contribute to the sector's reputation and standing.

Over the last 10 years successive English governments have introduced market dynamics and competition into the higher education system. New providers of higher education have been incentivised to enter the publicly funding system in England. These challengers, designed to up the game of 'incumbents', aim to meet policy goals of improved quality of education and accountability to students for their annual tuition fees of £9,250. Note that different policies and approaches have been adopted in Scotland, Wales and Northern Ireland.

The development of QAA's review methods

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[1] www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code

QAA is an independent body that has peers and students at the heart of its review methods. Reviewers' judgements about quality and standards made reference to a UK wide technical document (the Quality Code); and reviewers assess processes rather than (as per burdensome previous methods) observe teaching.

Quality assurance in Wales and Northern Ireland has tended to largely follow the English model and direction. The quality assurance regime in Scotland however differs. It is a relatively stable model that sits within a quality enhancement framework (QEF) that is owned collectively by the Scottish sector. The review method in Scotland is Enhancement Led Institutional Review which interrelates strongly with the other areas of the QEF, especially Enhancement Theme work. Higher education funding in Scotland is still largely aligned to a funding council model with student number caps for Scottish domiciled students. Historically this model has encouraged collaboration rather than competition between institutions.

The size and shape of the English sector, on the other hand, has fundamentally changed over the last 20 years. This reflects both growth in student numbers (around three million students are currently studying for a UK qualification); and competition for student places from new and existing entrants to the system.

These changes and dynamics had not been accompanied by changes or reform to the regulatory and legal architecture until recently with the April 2017 Higher Education and Research Act. Throughout this period QAA's English review methods have adapted, to include (for example) students in review teams, but did not materially change. QAA had however publicly and privately identified diminishing returns from cycles of external review.

More fundamental risk based reforms were proposed in 2011 by the funding body with statutory responsibility for quality in England, the Higher Education Funding Council for England (HEFCE). At that time HEFCE consulted on a more data driven review method. Data and performance indicators were suggested to assess levels of risk; and risk, in turn, would help determine the frequency of external review by QAA. Up to 10 years for low risk institutions was suggested.

At the time these changes were not supported by the sector. HEFCE found broad support for QAA's existing review method 'given the success of this method in ensuring rigorous, robust review'. And around a fifth of consultation respondents did not support more fundamental reform which would be out of step with European standards and guidelines.[2]

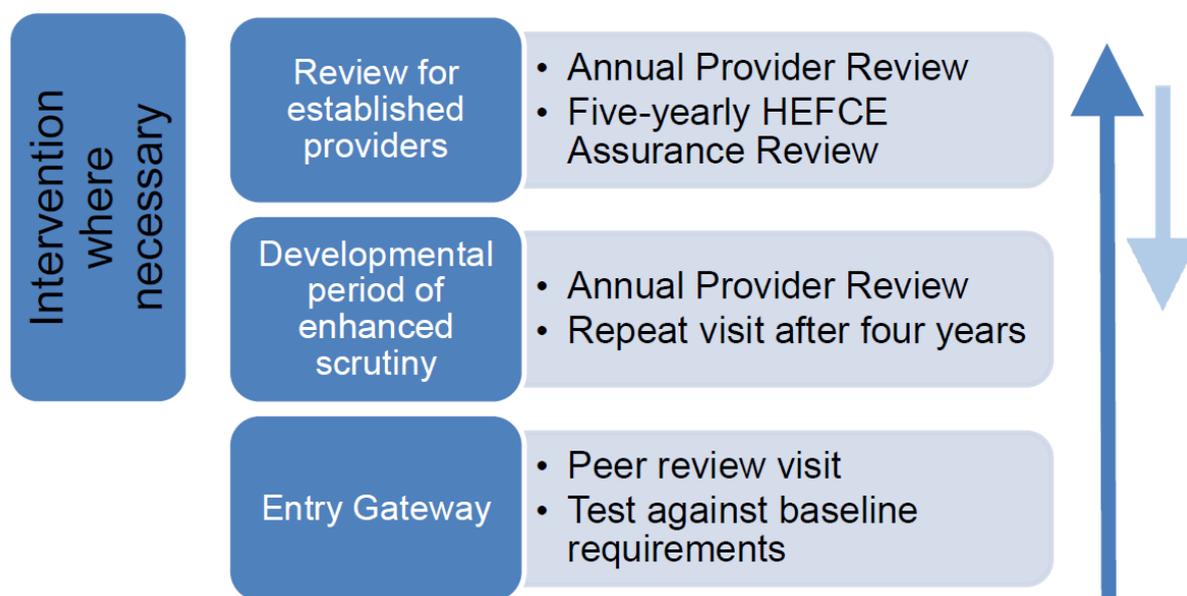Revised operating model for quality assessment and the Teaching Excellence Framework

Set against this background, HEFCE next consulted on reforms to the quality assessment regime in 2015. Recognising that the English sector was more diverse, their proposals were designed to be 'proportionate, risk-based and grounded in the mission and context of an individual university or college and the composition of its student body.' A further aim was to reduce the cost and burden of cyclical review.

Largely unchanged from the consultation proposals, QAA's reviews have (simply put) been replaced in England by a data driven annual monitoring process. Called Annual Provider

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[2]www.enqa.eu/index.php/home/esg/

Review (APR), this is the primary (although by no means only) means by which HEFCE has made judgments about and assessed quality and standards since September 2016. While further detail about the wider reforms is available at www.hefce.ac.uk/reg/QualityAssessment/, the following graphic outlines the process and reforms. Note that external quality assurance review continues for both new entrants to the publicly funded system and where the new QA regime finds concerns about quality and standards that warrant further investigation (intervention where necessary in the following illustration).

Quality assessment from 2017-18

Intervention where necessary	Review for established providers	• Annual Provider Review • Five-yearly HEFCE Assurance Review
	Developmental period of enhanced scrutiny	• Annual Provider Review • Repeat visit after four years
	Entry Gateway	• Peer review visit • Test against baseline requirements

As well as having a statutory duty to assess quality, HEFCE also oversee the financial sustainability of the universities and colleges they fund. The APR data (see later for detail) are combined with 'soft' intelligence about the institution – such as its success in recruiting students and its financial sustainability - to make one of two judgements: 'has concerns' or 'no concerns' about quality and standards. Unlike the 2011 proposals, data will not be used to determine the time between external quality reviews. Instead they will inform judgments about quality and standards.

The UK government is currently consulting on the proposed new regulatory framework for higher education which will come into force from 2019-20.[3] The consultation proposes that the Office for Students (the sector regulator replacing HEFCE) "will not undertake routine reassessment of providers, either along the lines of Annual Provider Review or of annual redesignation". Instead a risk based approach could be adopted, including random sampling of a small number of providers for assessment against set criteria.

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[3] https://consult.education.gov.uk/higher-education/higher-education-regulatory-framework/supporting_documents/HE%20reg%20framework%20condoc%20FINAL%2018%20October%20FINAL%20FINAL.pdf

The revised operating model for quality assurance was developed around the same time as a new UK government was elected in May 2015 with a commitment to introduce a Teaching Excellence Framework (TEF). The TEF promised to provide 'clear incentives for higher education institutions to deliver value to students and taxpayers.' Much like the APR, the TEF is a data driven process that uses similar data as proxies for teaching quality, standards and student outcomes. The Department for Education is responsible for the TEF and commissioned HEFCE to carry out the second year of the framework on its behalf. QAA was part of the team that was established to implement Year Two of the TEF.

Success in a QAA review was initially used as a proxy for quality in Year One of the TEF and, with that, the ability to raise undergraduate tuition fees in England by the rate of inflation. From the 2017-2018 academic year, success in a data driven TEF will be used as both a signalling device and gatekeeper: success may allow universities and colleges to increase undergraduate tuition fees by inflation (depending on parliamentary approval) and, also, signal quality teaching. The data are complemented by a submission from providers themselves. The results - either 'gold', 'silver' or 'bronze' - are ultimately mediated and decided by a TEF committee chaired by Professor Chris Husbands, the Vice-Chancellor of Sheffield Hallam University.

The TEF Year Two results were released on 22 June 2017. Around half of the 231 institutions who took part were awarded silver, just over a quarter were awarded gold and just under a quarter were awarded bronze. 18 institutions appealed resulting in one institution's award changing from silver to gold. There has been much detailed analysis in the UK HE press done on the patterns and trends in the data e.g. the variation in awards by region and type of institution.

An interesting area of analysis highlights the importance of combining 'hard' and 'soft' intelligence in the TEF. The data used in Year Two of the TEF postulated an initial award for the provider, the submissions (soft intelligence) allowed providers to contextualise the data (hard intelligence) and in some cases resulted in a different final award. 34 providers moved from a bronze to a silver, three from a bronze to a gold, 19 from a silver to a bronze, 14 from a silver to a gold, 10 from a gold to silver and one from a gold to a bronze.

Given the devolved nature of higher education policy different combinations of the APR and TEF have been adopted by the UK's nations, as follows.

Country	Teaching, learning and student outcomes (TEF)	Quality and Standards (APR)
Scotland	5 out of 18 providers took part in 2016-2017 (TEF Year 2)	N/A in Scotland, due to QEF being in place
Northern Ireland	0 out of 2 providers took part in 2016-2017 (TEF Year 2)	Applies to all publicly funded providers from 2017-2018
Wales	7 out of 10 providers took part in 2016-2017 (TEF Year 2)	Continuation of Quality Assessment Framework, QAA commissioned to review all universities in Wales.
England	222 public and private providers took part in 2016-2017 (TEF Year 2)	Applies to all publicly funded providers from 2017-2018

The data used in the TEF (Year 2) and APR
The key data used are:

- the national student survey (NSS). This survey gathers final year undergraduate students' opinions about their student experience
- student non-continuation rates, or the proportion that drop out
- the proportion of students in employment and further study six months after graduation.

Benchmarked data are used to ensure the data are making fair comparisons and controlling for factors that are outside an institution's control. To illustrate a benchmark; students are less likely to complete their course if their prior achievement is weaker than their peers. Long established performance indicators in higher education take account of an institution's student profile to develop benchmarks that, all things being equal, identify the proportion of their students that the data suggests should drop out.

Benchmarked data has however been subject to debate. Some argue (often selective institutions) that absolute figures are better because improvement on particularly high benchmarks (i.e. where virtually no student drops out) is more difficult to achieve than at universities with less selective student profiles. Similarly, the use of the NSS has been questioned, particularly around the methodology and whether a measure of satisfaction is appropriate for judgments about quality. This concern has been addressed (along with concerns over the impact of the NSS boycott by the National Union of Students) in Year Three of the TEF with the weighting of the NSS being halved. The TEF's guidance makes the case that student retention is a good proxy for high quality teaching and learning; this has been relatively uncontroversial.

Much like the TEF, undergraduate data predominates in the APR although two metrics for post graduate taught students will be used if thresholds are met. For both the TEF and the APR up to three years' data are used. An APR is conducted every year whereas a TEF award lasts for three years (unless the provider has fewer than three years' worth of data in which case the award is only valid for the length of time data is available), providers do not need to apply again in that time but can if they wish to e.g. if they have made improvements such that they think they will go from a Bronze to a Silver.

The wider use of data in the APR reflects the greater range of data available to HEFCE in their role as principal regulator of the English sector and, also, their policy concerns such as the performance of students from disadvantaged backgrounds. Otherwise, as the following table illustrates, there are many similarities in the key data if somewhat different applications.

Data, metric and proxy	TEF (Year 2)	APR
Student recruitment patterns (growth or decline in student numbers following the removal of Student Number Controls). Decline may be because of competition from other providers or, equally, a deliberate decision to reduce student numbers and increase resource to improve the student experience		x
Sub contractual arrangements where one institution delivers another's education on their behalf. QAA reviews have consistently found that partnerships with others are an area of relative weakness for the sector		x
Student non-continuation (dropout) rates. Different groups of students are more or less likely to complete their course	x	x

National Student Survey (NSS), question 22, overall satisfaction		x
NSS questions on teaching, assessment and feedback, academic support	x	
Higher Education Statistics Agency (HESA) UK Performance Indicators, based on returns from the Destination of Leavers from Higher Education Survey (proportion in employment and further study six months after graduation)	x	x
Differential student degree outcomes (proportion of leavers from different ethnic backgrounds awarded first class or 2:1 award)		x
Financial data from HEFCE (net liquidity days, surplus (or deficit) as a proportion of total income etc.)		x
Estates sustainability for Higher Education Institutes (proportion of space with good functional suitability etc.)		x
Assurance information from HEFCE (assurances from the vice-chancellor on e.g. data quality, quality and standards, value for money, financial sustainability etc.)		x

Reflecting different purposes, the APR makes judgments about quality and standards; the TEF teaching, learning and outcomes for students.

Update and discussion

Quality assessment has to manage tensions between accountability and improvement/innovation; burden and process; and between managing risk (usually derived from past performance) and future assurances about quality. While the balance between these tensions may not have been quite right, it is worth remembering that too much innovation and weak regulatory regimes (as with the financial services industry and the financial crisis of 2007-2008) can have very serious consequences. The learning from England's recent experience, triangulated by QAA's research, is that diverse higher education systems need 'differentiated quality assurance arrangements. Different kinds of institutions have different needs and require different forms of control and support'.[4]

While QAA had publicly and privately identified diminishing returns from external review, a case can be made that the higher education sector's response to HEFCE's 2011 quality assurance consultation represents a missed opportunity. Co-regulation inevitably demands compromise and, with that, a tendency for incremental reform. In that context, and while a case can be made that HEFCE's quality assurance reforms represent a bold new paradigm, the performance of the reforms in assuring quality and standards does remain to be seen.
The TEF was developed in parallel to the APR. Politics rather than a funding body played a central role in the TEF's policy development and implementation. It was born from and developed through the legitimacy of a manifesto commitment in a general election.

In April 2018 the Higher Education and Research Act was passed by parliament leading to new legislation and a major overhaul of the regulatory architecture in the form of a new student focused regulator in England, The Office for Students. There is also, for the first time, statutory underpinning for a designated body responsible for quality and standards. QAA has

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[4] www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=3081#.WQngz632a70

put itself forward to be that body and has been the only applicant.[5] The Act also puts into English law, for the first time, the principle of co-regulation, independent quality assurance and the sector's ownership of academic standards.

Compromises were needed between the government and the upper chamber to pass the Higher Education and Research Act, before the last parliament ended on 28 April 2017. One of those compromises is a commitment to a fundamental review of the TEF in 2018-2019. The Year Two TEF results were published on 22 June 2017, having been delayed by the calling of a general election on 8 June 2017. There will also be no differentiation of fees based on TEF results until 2020-21, with any increases thereafter subject to parliamentary approval. 18 institutions appealed against their awards however only one award was changed as a result of an appeal.

Since the release of the Year Two TEF results a number of changes have been made to the third year of the process. These include:
- changing the name of the process to Teaching Excellence and Student Outcomes Framework (the TEF acronym will be maintained)
- halving of the weighting of the NSS metric
- addition of a grade inflation metric
- addition of a metric based on the salary data derived from linking individual student records to their later tax return data
- additional flags will be used to highlight when an institution has scored in the absolute top or bottom 10% of any metric.

Finally, both the TEF and APR have brought about significant reform to the UK's quality assurance and teaching quality regimes. These reforms demand more of quality professionals, particularly the need to develop their understanding of data and increase their data capability. Understanding the language and limitations of data is not however an end in itself. Throughout this period of reform and change it is important we do not forget the importance and key purpose of quality assurance. That is to ensure the three million students working towards a UK qualification get the higher education experience they are entitled to expect.

References:

[1] www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code
[2] www.enqa.eu/index.php/home/esg/
[3] https://consult.education.gov.uk/higher-education/higher-education-regulatory-framework/supporting_documents/HE%20reg%20framework%20condoc%20FINAL%2018%20October%20FINAL%20FINAL.pdf
[4] www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=3081#.WQngz632a70
[5] http://www.qaa.ac.uk/newsroom/qaa-states-intention-to-be-designated-quality-body#.WfB0qGhSzIU

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[5] http://www.qaa.ac.uk/newsroom/qaa-states-intention-to-be-designated-quality-body#.WfB0qGhSzIU

Discussion questions:

1. What are the limitations and benefits associated with data driven QA regimes?

2. Has the UK implementation of a TEF affected or influenced the QA regime or teaching quality regimes in other countries?

3. Is radical reform possible or achievable in regulatory regimes that are characterised by co-regulation?

4. Are the proposed changes to Year Three of the TEF the right ones?

Please submit your proposal by sending this form, in Word format, by 24 July 2017 to QAForum@eua.be. The file should be named using the last names of the authors, e.g. Smith_Jones.doc. Please do not send a hard copy or a PDF file.