

Russell Group response to QAA consultation on the handbook for Higher Education Review (in England and Northern Ireland)

Judgements

1. Should a judgement of 'requires improvement to meet UK expectations' be available in the area of threshold academic standards?

No view

Initial appraisal

2. Should an initial appraisal be used to tailor the intensity of individual review visits?

Yes

Reviewers and review teams

3. Should the process involve international reviewers?

No.

4. Does the pilot proposal offer a reasonable way to introduce international reviewers?

No view

5. Please note any brief suggestions you have about introducing international reviewers.

In principle international reviewers could add value to the work of a review team, if they had sufficient expertise and training. However, we do not support the proposed pilot exercise to introduce international reviewers because this will increase costs at a time when public resources are under pressure. In this environment a national agency such as QAA should be looking to reduce, not increase, its running costs passing savings back to the universities, and the public bodies, which fund it. If the pilot does go ahead it will be important for it to test selection and training arrangements to ensure that the reviewers are sufficiently familiar with UK higher education and the diversity of providers within the sector. This will be especially challenging if the international reviewer is also a student.

The consultation states that 'the introduction of international reviewers would reflect the increasing internationalisation of the HE sector in this country'. Rather than using reviewers from the EU, who may or may not have expertise in this area, this objective could be achieved more effectively by ensuring review teams had a UK-based reviewer with relevant expertise. This might be gained from experience of working internationally, and/or working on international and collaborative provision while based in the UK.

Managing higher education with others

6. Do the proposals for the review of arrangements for working with others establish an appropriate demarcation between the areas reviewed at a degree-awarding body and those reviewed at the partner, delivery or support organisation?

Yes

7. Should the new method include a separate judgement about managing higher education provision with others?

No

The initial appraisal in more detail

8. Is the proposed scale and provisional level of confidence appropriate for the initial appraisal to determine the intensity of the review visit?

Yes

9. Is the proposed approach to determining the scale of the provision appropriate?

Yes

10. Is the proposed approach to determining the level of confidence appropriate?

Yes

11. Should the information base used to identify the level of confidence:

- a) be enlarged
- b) be reduced
- c) be changed in some other way
- d) remain the same

d) remain the same

12. Please note any brief suggestions you have about changes relating to the information base.

No comments

13. Should provider self-evaluation documents have a bearing on the initial appraisal?

Yes

14. Should student submissions have a bearing on the initial appraisal?

Yes

15. Is the concept of high, medium and low intensity review visits appropriate?

Yes

16. Please note any brief suggestions you have about the intensity of review visits.

Following the previous consultation exercise, HEFCE has asked QAA to vary the intensity of reviews, and it is now essential that the opportunity is taken to lighten the regulatory burden of external review substantially for successful universities with the strongest track record in providing high quality teaching. Our universities will not flourish if they are over-regulated. International research shows university autonomy leads to better outcomes.

The arrangements outlined in the handbook have the potential to deliver variation in intensity and it is important that this now happens in practice. In particular, the quantity of documents that institutions are required to assemble in the existing review method is substantial and has created significant burden on institutions. We strongly encourage the QAA to work carefully on this in implementing the new review method and reduce the quantity of material required.

More generally, checks should be made during implementation to establish whether or not a lighter-touch approach has been implemented for institutions with a strong track record of delivering effective quality assurance and enhancement.

17. If you have any further comments about the initial appraisal please provide them here.

We broadly support the idea of an initial appraisal (rather than an extra visit to the institution), as this appears to provide one way of helping to reduce the burden of reviews, while enabling the review to take place effectively. However, the matrix in the draft handbook places a lot of emphasis on the size of the institution, so that a large institution, particularly one with significant collaborative provision, could only receive a 'medium' or 'high' intensity visit, with a 'low' intensity visit only available to small institutions. The following paragraph does acknowledge that 'the initial result may then be refined by the professional judgement of the reviewers'. However, to ensure that the new review method is genuinely risk-based, greater flexibility should be made available and the matrix should be reworked so that a low intensity review is an option available for all types of institution, particularly those with strong track records in previous QAA reviews.

There should be some opportunity for institutions to engage with reviewers at the initial appraisal stage. This could be a very light-touch engagement but it could be useful to address emerging themes at this stage rather than wait until the review visit. Such interaction should also allow the institution to appeal against the outcome of the initial intensity appraisal if necessary.

The review visit in more detail

18. Should there be just one visit to the provider?

Yes

The review team

19. Should we allow professional support staff to be reviewers?

Yes

Keeping the method under review

20. Is the proposed categorisation of operational, minor and major changes appropriate?

Yes

The role of students

21. Should the role of students in Higher Education Review be strengthened compared to the role of students in IRENI and RCHE?

No

22. Please note any brief suggestions you have about strengthening the role of students in the review process.

Students already play an active and valuable role in reviews. However it remains important that QAA ensures students involved in reviews are properly supported, through provision of appropriate training, advice and resources.

We are not persuaded that the role of students should be further strengthened in the ways proposed. We have concerns about the proposal that individual students should be able to contribute their views directly to the review team. There are practical issues: it would be necessary to ensure that students are actually registered at the institution; a large volume of submissions could create a workload that is disproportionately onerous for reviewers and institutions who should have a right to reply; the timing of any request for input from individual students should not impede the evidence gathering for the student written submission. Instead the focus should remain on the student written submission: this provides a route by which the views of students can be collected together, evaluated and presented in a way which represents the views of the majority of students in an institution.

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