



## Universities Scotland Quality Enhancement Framework Consultation Response

This consultation response is informed by contributions from member institutions through discussion and written comments from Learning and Teaching Committee, Teaching Quality Forum and discussion at Universities Scotland Main Committee.

The response was approved for submission by Universities Scotland Main Committee on 27 January 2015.

The response is intended to provide constructive criticism to existing practices and procedures and to consider opportunities for enhancement.

### **Overarching feedback**

The sector considered the five elements and underpinning principles of the Quality Enhancement Framework. The current approach was both forward-thinking and comprehensive when introduced in 2003 and continues to provide an effective set of underpinning principles and elements which remain fit for purpose. The maturity and consistency of the approach is considered to be a key factor in the effective engagement of institutions in quality processes. The evolution of sector-led enhancement is considered to have supported the embedding of enhancement in strategic processes and the development of a 'quality culture'.

The sector affirm commitment to, and support of, the underlying principles and the elements of the Quality Enhancement Framework. These individual elements are discussed in more detail below.

The majority of members consider ongoing comparability to UK-wide academic quality and standards to be essential (this should not be confused with comparability of quality processes which was explicitly not supported.) The ability to compare quality across national borders does not require uniformity of policy or practice across all nations of the United Kingdom but does require cognisance of developments beyond Scotland (particularly through the ongoing HEFCE Quality Assessment Review). The UK Quality Code for Higher Education is the culmination of a huge amount of effort across the sector and provides a comprehensive framework of expectations and indicators against which Scottish higher education quality can be assessed. While there was acknowledgement from some members that the Quality Code was a work-in-progress, it is fundamental to the comparability of quality across the nations of the UK. There was no value foreseen in duplication of effort in creating a Scotland-specific Code or set of indicators.

In the current political context, the importance and value derived from institutional autonomy, sector ownership of quality through the formal tripartite agreement between Scottish Funding Council, Quality Assurance Agency and Universities Scotland and the partnership approach between sector bodies, institutions and students was considered to be a vital and distinctive aspect of Scottish higher education quality assessment. The approach supports collegiality, mutual respect and openness and contributes significantly towards effective institutional engagement with quality matters and maintenance of education as a national priority for social good.

## **Review of Framework Elements**

There is support for retaining the five elements of the Quality Enhancement Framework. It was reflected in some responses that certain elements of the Framework had been more successful, or more successfully embedded in Scottish higher education policy and practice, than others. These will be identified below.

The sector were proud of the enhancement agenda in Scotland and particularly the focus on student engagement. All respondents considered these to be crucial elements of the existing approach to quality assessment in Scotland and essential elements to continue into the next iteration of quality assessment and review.

### *Institution-led review*

The requirements for institution-led review have remained substantively constant since the introduction of the Quality Enhancement Framework. This has allowed institution-led review (encompassing processes of annual monitoring, external examiners and periodic subject reviews) to become a firm bedrock of quality assurance and enhancement. A review of ELIR reports during the period indicates the effectiveness of these methods – and the growing confidence in them from 2003 onwards. Institutional Reflective Analysis also identifies institutions' willingness and expectation that they will continue to evolve and enhance these mechanisms. There is not considered to be any requirement for significant overhaul of these processes nor the expectations upon which they are based

### *Enhancement-led Institutional Review (ELIR)*

As noted above, the maturity and stability of the ELIR method is considered to be a significant benefit to the effectiveness of the process. Institutional responses contrast this with the relative flux in assessment methods across the rest of the UK. A consequence of the stability of the ELIR process and the focus on enhancement is the gradual mainstreaming of quality assessment into institutional strategic processes.

Enhanced quality from 2003 and the stability of the Scottish HE system supports a recommendation from the majority of members to extend the ELIR review cycle to six years.

The Scottish HE sector has successfully developed a 'quality culture'. Through this, institutions have increasing confidence in producing reflective, self-evaluative Reflective Analysis for Institutional Review, the internal quality processes have been strengthened and refined and students and other key stakeholders such as employers and professional bodies have a more influential voice in quality matters than ever before.

The extension of the ELIR review period could further support the embedding of quality management in institutional strategic planning for learning and teaching which are often on a 5-8 year cycle. Extended review periods would allow for greater alignment with strategic cycles and allow time for embedding of changed practices prior to further review.

When comparing ELIR review cycles to comparable HE sectors around the world where the periods of accreditation or duration between reviews stretches from four years (Scotland) to five (Ireland), six (England), up to seven (Australia) and up to ten years (United States and Canada), ELIR appears out of line. The short ELIR cycle could be misinterpreted as a signifier of concern over quality and undermine the international reputation of Scottish HE.

In light of the developed 'quality culture', in the context of supporting individual institutional strategy and in reviewing comparative quality assessment schemes in other nations, there is an opportunity to reflect this more appropriately in the review cycle duration. The revision to the ELIR cycle duration would be a demonstration of the sectors' confidence in the quality of higher education provision in Scotland and reflective of its international standing

The current institutional review method requires annual discussion and annual reporting on a variety of topics to multiple stakeholders. The current approach – and the rationale – is considered to be poorly-

defined and bureaucratically burdensome with limited demonstrable benefit. The current requirements include:

- Annual Discussion between institution and QAA Officer (including submission of documentation)
- Annual letter of assurance from QAA to SFC on each institution
- Annual Quality Report from institutions to SFC

The annual Outcome Agreement process between institutions and the SFC is considered to be, appropriately, separate from the quality processes but should be considered with respect to over-lapping data requests.

In reviewing the required documentation for the above, there are overlaps in requirements particularly between the documentation for Annual Discussion with QAA and the annual quality return to SFC. The timing of current discussions and returns also requires reporting from institutions to sector bodies at regular intervals during the year.

Members reflected a range of views in relation to annual reporting requirements. All respondents considered minimising bureaucracy and ensuring clarity and proportionality of processes to be key to the success of the quality processes. All members agreed that an exercise should be conducted to identify all annual reporting requirements on institutions to ensure there was no overlap. Within this consensus, the majority of respondents felt that the Annual Discussion meetings were less effective than other aspects of the QEF. It was considered that a key initial purpose of the annual discussion meetings was to build relationships between QAA and institutions. As these relationships now exist, this may have diluted the requirement or purpose of these meetings. Members considered that, should annual reporting requirements be retained, the data requirements and purpose of the reporting or discussion should be clarified.

Members made various suggestions for potential changes to annual reporting requirements:

- an opportunity to bring annual reporting to QAA and SFC in-line with ELIR Advance Information Sets requirements, thereby facilitating consistent single-line reporting and supporting the development of the Advance Information Set in an annual, embedded approach for future institutional review.
- QAA could be empowered, by exception, to hold an annual discussion if they were unsatisfied with the annual institutional report.
- A light-touch annual report/discussion could be retained as a quality assurance tool to support an extended ELIR cycle

### *Public Information*

Scottish higher education institutions are committed to the provision of accurate, timely and inclusive public information individually and collectively. As such, Scottish HE institutions are committed to the expectations and indicators of quality in Chapter C of the UK Quality Code for Higher Education. However, the relevant impact and importance of the public information agenda in Scotland is considerably different from the impact across the rUK given the distinct approaches to funding for higher education and the increasingly 'consumer market' approach in England. Thus, manifestation of public information requirements implemented across the UK do not always find favour in Scotland. In recognition of the diversity (and divergence) between the sectors and in considering opportunities for public information requirements in the long-term (five to ten years) flexibility in the requirements placed on Scottish institutions should be agreed. In particular, the appropriateness of the Key Information Set in Scotland is being considered through the review of KIS led by the Higher Education Public Information Steering Group. In future, UK-wide public information developments should be treated as opt-in for Scottish higher education requirements.

### *Enhancement Themes*

The Enhancement Theme model has evolved since its inception in 2003. The most significant evolution was in mid-2000s with the transition to broader, multi-year Themes. This development was welcomed by the sector and the quality of engagement and effectiveness of the Enhancement Themes is considered to be have been greatly boosted by this change.

Employability – and the various themes which explicitly or implicitly supported the employability agenda – was highlighted as a particularly successful area of work which would not have advanced as quickly or as successfully without the supporting structures and driving forces of the Enhancement Theme approach. It was reflected that further value from the Themes could be extracted by embedding a formative impact evaluation framework at the outset of each new Themes, facilitating more effective evaluation and demonstration of impact against agreed metrics. The emphasis on this in the current Enhancement Theme is positive.

### *Student Engagement*

Institutions confirmed support for the maintenance of student engagement as an integral aspect of the Quality Enhancement Framework. Institutions reflected on the international recognition of Scotland as an early advocate of student engagement and the continued leadership of Scotland in HE worldwide in this field. The sector also demonstrated an appetite to build further upon the considerable success thus far.

Student engagement at the highest levels of decision-making within institutions and the sector and as key players within quality processes (both institution-wide and institution-led) have been notable and positive developments since 2003. In the next five to ten years, the sector considers there to be two main areas of further work: broadening and deepening student engagement and evidencing impact and benefit. There are opportunities for institutions, within the constraints of time and resources, to seek greater engagement of students beyond the student representative structures. This is not an inconsiderable challenge but one the sector is keen to meet. Secondly, institutions will seek to evidence more clearly the demonstrable benefit of student engagement (to institutions and students) and to more clearly demonstrate the impact of student engagement.

In seeking to achieve these two goals, institutions will continue to work fruitfully with students' associations and the national student development agency sparqs. The sparqs Student Engagement Framework is a facilitative tool which will support institutions in expanding student engagement beyond the student representative structures. The ongoing work sparqs are carrying out in relation to performance monitoring and impact of student engagement will be utilised to inform future institutional activity in student engagement.

### **Evidencing Impact**

The sector is responding to the increasing expectations of impact-measurement of institutional activities on a wide-range of areas notably through Research Excellence Framework and the Outcome Agreements. Lessons can be learned from both of these processes to inform the more systematic evidencing of impact through quality assessment approaches.

It is important to note that the nature of quality processes do not generally lend themselves to meaningful quantitative analysis of impact (in the way, for example, Outcome Agreements may do). Members agreed that any steps towards greater evidencing of impact should be proportionate and should not incur unreasonable burden.

Institutions would welcome an approach to demonstrating impact more creatively – particularly through case studies.

Consideration could be given to evidencing impact beyond academia through engagement of employers and professional bodies. These stakeholders are already involved in the development of programmes and monitoring of quality (i.e. through accreditation) but there may be an additional role for employer boards or professional body groups at a sector-wide level with explicit responsibility to comment on impact.

Crucially, when considering evidencing impact, the focus should be on longitudinal impact. The sector (and the broader society) benefit greatly from a considered and measured approach to enhancement with benefits delivered in the long-term rather than the expectation of immediate benefit from significant changes. This longitudinal approach would be well facilitated by case study impact assessment.

In line with Research Excellence Frameworks, the case study model could be used to highlight examples of impact (rather than being over-prescriptive in requirements or quantity) which demonstrate the institutions approach to enhancement.

### **Conclusion**

The Scottish HE sector unanimously confirm their commitment to the enhancement agenda, to student engagement and to the gradual evolution of the effective and forward-thinking Quality Enhancement Framework.

The consensual nature of this response is a by-product of the collaborative quality culture which has been developed in Scotland since 2003 and of which the sector is proud and wishes to retain.

The Quality Enhancement Framework Review allows for the recognition of the high standards of the sector and the mature processes and engagements between institutions and between institutions and sector bodies. This underlying confidence in the quality and standards of the Scottish sector facilitate the proposed extension to the ELIR cycle, the more effective approaches to annual reporting and the contextualised approach to public information.

### **Further information**

Gavin Lee, Head of Learning, Teaching and Widening Access

[Gavin@universities-scotland.ac.uk](mailto:Gavin@universities-scotland.ac.uk)

0131 225 0710