

LT609D109

Skip to: [main content](#) | [section navigation](#)

[Publications](#) > [2009](#) > [2009/47](#) > **Consultation**

## Printable summary of your responses

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## Your responses

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?

Agree

1a

Please add any comments:

We broadly agree with the principles that should underpin the revised quality assurance system. We would caution however that in addressing concerns that standards between institutions are not comparable, care must be taken to avoid any concomitant pressures for a core or national curriculum. We believe that the current system of benchmark statements is and remains appropriate.

The replacement of the term "quality assurance framework" with "quality assurance system" could helpfully be expanded in terms of the implications of the change.

2

Do you agree that the objectives set out in paragraph 32 are the correct ones for the revised quality assurance system to meet?

Neither agree nor disagree

2a

Please add any comments:

We have some concerns about some of the objectives hence our response of a partial agreement to this question.

Our concerns are as follows:

1)Re. 32 a i) - reference to accessible public information on a consistent and comparable basis raises the spectre of yet more league tables and the possibility that universities will be persuaded to play the league

table game rather than appropriately focus on quality and standards.

2)Re. 32 a ii) - Again we have concerns about comparability and about the definition of public expectations. Whose expectations? Note too that the expectations of different stakeholders could change over time.

3)Re. 32 b iii) - Clarity regarding the assurance of the threshold standards of awards would be welcome. Is this at the level of a pass at honours or a certain classification (noting that institutions have different ways of arriving at classification).

4)Re. 32 d i) - How are current and prospective students' interests to be identified? These could change over time and in ways which an autonomous institution might not support.

5)Re. 32 c iii) - Clarification of how external review is carried out by independent reviewers might usefully be incorporated. Who are the independent reviewers in this paragraph 32 c iii) as 32 e iv) refers to the QAA and PSRBs? Are they the same, or different? Is the reference perhaps to the use a University makes of external examiners and independent person in programme review?

### 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?

Disagree

#### 3a

Please add any comments:

Our major concerns with the proposed characteristics of a revised institutional audit method relate primarily to 38 a. and 38 c. Whilst we understand and accept some flexibility, this should not compromise consistency and therefore comparability across institutions. As couched at present, the proposals would seem to introduce too much flexibility and potential inconsistency into the system. We note that during the audit cycle currently drawing to a close, a major change has been incorporated in terms of the addition of student auditors. We reiterate our concerns about too heavy a focus on comparable public information whilst accepting of course that stakeholders should have access to appropriate information that is accurate as far as possible.

### 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?

Disagree

#### 4a

Please add any comments:

We reiterate our concerns regarding the proposal to include additional topics to be determined as necessary into the audit method. This would seem to us to introduce an element of inconsistency and therefore incomparability amongst different institutions. We would also have concern about the notice to be given to an institution regarding the additional topics that might form part of an audit. We also seek reassurance that the sector would not face an increased audit burden in terms of institutional review and perhaps additionally, a form of thematic review. In this regard, Paragraph 40 should be clarified.

### 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?

Agree

**5a**

Please add any comments:

However, please note our reservation expressed in Question 2 above.

**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?

Neither agree nor disagree

**6a**

Please add any comments:

We have strong reservations about the possible introduction of additional judgements. We do not object to the QAA reviewing the terms it uses to describe the different levels of confidence but we have reservations should the debate focus on additional judgements. We feel that this would again lead to more league tables and also raises the possibility of differential funding based on the level of confidence.

We do not consider it appropriate to introduce additional judgements about academic standards when the test is about meeting a threshold. Either a University meets this or it does not.

**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?

Disagree

**7a**

Please add any comments:

Although we have no objection to the principle that prospective students, current students and other stakeholders have access to accurate and reliable information, we do have a strong objection to making this a judgement in institutional audit as opposed to a comment. Against what criteria would such a judgement be based? How much time would be needed to audit?. In this instance, we prefer the status quo.

We would have concern that publication of a standard set of information might encourage proliferation of league tables and the inappropriate focusing of efforts by institutions.

**8**

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

Agree

**8a**

Please add any comments:

Institutions should have the right to check summaries as, by their very nature, they (i.e. the summaries) are selective.

**9**

Do you agree that institutional audits should be organised on a rolling basis rather than in a fixed cycle?

Disagree

**9a**

Please add any comments. In particular, if you agree, what would be your definition of a minor change to procedure, compared to a more substantive revision?

Our objection is not about the proposal to organise audits on a rolling basis per se, but about how comparability and consistency can be ensured. The basis on which additional topics are identified would need to be clear and sufficient preparation time must be given to universities. However, the proposal seems to us to introduce too much uncertainty and inconsistency into the audit process.

With regard to Paragraph 68 - Quality assurance of work-based learning, we would welcome clarification as to whether the QAA will include WBL as an area for routine scrutiny where such learning is already scrutinised by professional regulatory and/or statutory bodies in certain areas (e.g. health and teaching). This would seem to us to be a duplication of effort.

**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

No comments.

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