

LTC11D118

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# **A risk-based approach to quality assurance Online response form**

## **Printable summary of your responses**

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### **Your responses**

#### **1a**

Please comment on the extent to which you consider that the agreed quality assurance system and HEBRG principles, set out in paragraphs 52-56, provide an appropriate basis for a more risk-based approach to quality assurance.

The principles as laid out in paragraph 53 represent only a partial basis for a risk based approach to quality assurance. Significantly, there is no reference to the government's goal of achieving substantial deregulation , reducing the administrative burden. However, it is the absence of any reference to risk assessment or analysis that causes most concern. Paragraphs 52-56 taken in the context of the proposals that follow do not provide a basis for a risk based approach.

### **1b**

Are there any other principles that should apply?

Yes:

- For the purposes of quality assurance audit 'Risk' shall be defined as the probability that the governance, regulations and processes of an institution are such that the quality of learning and teaching may be compromised. Thus a low risk institution would be one in which there was a very low probability of the quality of learning & teaching being compromised without remedial action being taken.
- The assurance of quality by an external agency is an audit process and shall be governed by processes and drivers appropriate to an audit environment
- In order to achieve substantial deregulation a risk analysis model shall determine the frequency and intensity of audit for each institution
- In order to reduce the administrative burden, systems testing rather than substantive audit testing shall be applied to those institutions categorised as low risk

### **2**

In the pursuit of a more risk-based approach to quality assurance, the consultation proposes that the extent, nature and frequency of external quality assurance should vary according to the track record and scope of the provision of the higher education provider. Do you agree?

Strongly disagree

### **2b**

Please explain the reasons for your answer.

The basis for determining the frequency and intensity of audit that is proposed here has no relation to the assessment of risk. In a quality assurance audit framework the notion of risk must surely refer to the possibility that an institution is insufficiently assuring the quality of its offer. While track record is an indicator of likely risk, the scope of provision has no necessary impact on the level of risk.

### **3a**

Do you consider that establishing within Institutional Review a core review process and additional modules for particular types of provision (for example on elements of collaborative provision) would help with achieving the risk-based approach to quality assurance?

Strongly disagree

### **3b**

Please explain the reasons for your answer.

The core plus module approach is a means by which the audit of a given institution may be structured in a way that best reflects the activities of that institution. If the requirement to engage with each module and indeed the constituent elements of the core were to be determined by an analysis of the institution specific risk in relation to each of these elements then it would help to achieve a risk based approach. However, this is not what is being proposed. Instead assumptions have been made about types of activity in terms of relative risk rather than focusing on risk in terms of the institutional management thereof. There is nothing remotely risk based about the proposed use of core and module approaches to audit.

**4a**

Please indicate, for providers with a longer track record, on Route B, what should be the interval between external QAA institutional reviews, ranging from six to ten years.

Neither agree or disagree

**4b**

Please explain the reasons for your answer.

The interval for highly trusted institutions should be 10 years. To set the possible range as HEFCE proposes could result in the unhelpful outcome that Route A and Route B are only one year apart. It seems like a dreadful waste of public funds to emerge from this process with a 'risk-based model' that amounts to some institutions having twelve additional months between each audit.

**5a**

Please indicate, for providers with a shorter track record, on Route A, what should be the interval between external QAA institutional reviews. Bearing in mind the need for there to be a relationship between the review intervals of the two routes, do you have a view about the minimum or maximum interval between reviews on Route A?

*Not Answered*

**5b**

Please explain the reasons for your answer.

Question 5a above cannot be answered using the option boxes provided.

That aside, the suggestion of only two possible interval periods between reviews does not offer a risk based approach to audit. A risk based approach that delivers against the requirements set by BIS should offer a model in which frequency and type of audit (eg systems based or substantive testing) is determined by the risk assessment of the institution in question.

If, notwithstanding the extreme reservations about the proposed approach, we regard Route A as the riskiest of providers then the audit interval should be two years.

**5c**

Given the evolution of the quality assurance system, most further education colleges with higher education provision will be reviewed according to Route A initially. Should these providers have the option to undertake an early review during 2013-15 so that they may be able to transfer more quickly to Route B?

Agree

**6a**

Should – and, if so, how might – the QAA seek to streamline or modify its external review activities for those providers which have a substantial proportion of their provision accredited by PSRBs?

Agree

**6b**

Please explain the reasons for your answer.

To the extent that any element of an institution's provision is audited by a PSRB or similar body there is no value in that aspect of the external quality assurance process being repeated by the QAA since this adds to the already significant burden on institutions. However, since PSRBs are responsible to their professions and set their own timelines for accreditation and related processes, the scope for alignment of activities may well be limited.

#### **7a**

What form of annual assessment of key quantitative and qualitative data could be undertaken to determine whether there are grounds for any out-of-cycle investigations, which may or may not lead to some kind of formal review?

There should be no annual assessment of data to determine out of cycle investigations. The data referenced by HEFCE in its consultation document gives a clear indication of the very low risk across the sector as a whole in terms of the appropriate implementation of quality assurance mechanisms. In the light of the requirement by government to seek to reduce administrative burden and move towards 'substantial' deregulation the suggestion of an annual assessment is entirely at odds with the strategic intent behind the consultation. If there is a commitment to the strategic goals outlined by BIS with regard to the possible introduction of a risk based approach to quality assurance, this should be reflected in the proposed processes by which the monitoring of quality assurance is delivered. Consequently, out of cycle investigations should only be triggered where there is a significant concern that is substantiated by the submission of a number of well evidenced statements of concern using the existing processes for registering such concerns with the QAA.

#### **7b**

Are there any other data or information sources that the panel should consider?

It is not clear from the consultation documentation that sufficient evidence exists to support the need for a panel. Moreover, while the data being considered (under the extant proposals) would not require additional effort from providers, it does not seem proportionate to a sector which is acknowledged as being very low risk.

#### **8**

Do you have any other comments on this document or further suggestions for what we might do?

A number of institutional representatives commented at the London consultation event that the proposals do not represent a risk based approach to quality assurance. In spite of the strong steer from the government and BIS that a risk based approach should be introduced, this has not been reflected in any way within the proposals. The introduction of a temporary dual route approach to audit does not deliver the required substantial deregulation, nor will it reduce the administrative burden. As it stands the document represents a missed opportunity to make genuinely significant changes to the process of Institutional Review.

Perhaps the most disappointing aspect of the consultation is that the most important aspect of any risk based model, the assessment, definition, and analysis of risk is entirely absent.

Despite the governmental invitation to consult on 'the criteria against which overall risk should be assessed' HEFCE have not invited any comments on this most fundamental aspect of a risk based approach to quality assurance. It would be most helpful if the consultation were to be re-launched in accordance with the parameters set by the governmental invitation to consult.

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