



What's this 'Verification' business about?

In its March 2016 *Revised operating model for quality assessment* (ROM) HEFCE outlined the ways in which external quality assessments will now work for the providers that are linked to it – essentially, universities, colleges and further education colleges that provide higher education. The intention is that from Autumn 2016 external checks will not focus on the internal processes that providers use, as in QAA's Higher Education Review, but on whether and how providers' senates and academic boards (senior academic bodies) and, crucially, their governing bodies, are checking that provision for students meets national expectations and how these bodies act on what they find. We think that this is right: in our collective experience no failure in UK higher education quality or standards in the last 30 years has not been, at bottom, a failure in corporate and academic governance.

The rationale for Verification

Governance and internal review

HEFCE has stated that to introduce the ROM fully, for all its providers, a period of transition is needed and that it needs to know how senior academic and governing bodies are fulfilling their existing responsibilities. The purpose of the Verification process that is now being developed by HEFCE and QAA, and which is to be piloted in the coming months for launch in Spring 2017, is to enable HEFCE to better understand how individual institutions monitor, but more importantly, periodically review their educational and support activities, how they report review findings to their senior academic body and governing body, and how each body uses that information to oversee, in an active way, the management and enhancement of the academic experience of students, their outcomes, and to safeguard the academic standards of their awards.

Why is this necessary? Surely all this can be got from QAA's HER reports? Well, up to a point. In the HER reports for universities and colleges, most space is given over to checking that internal periodic review procedures comply with the Quality Code, with only glancing references to how internal review reports are used by senior academic bodies to fulfil their responsibilities. Reports to governing bodies on periodic reviews and annual monitoring lie outside the terms of reference of HER. This provides part of the explanation for the Verification exercise. However, many HER reports also use the term 'monitoring and review' in ways that make it difficult to be sure whether (short-cycle/annual) monitoring is being described or (longer-cycle/periodic) review. And while some HER reports refer to providers' annual monitoring and periodic review arrangements for learning and student support services, not all do so.

Consistency with Part 1 of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 1) 2015

During the consultations that preceded the ROM, HEFCE was informed by providers and by QAA of their concerns that its proposals would not be consistent with Part 1 of the ESG as revised in 2015. HEFCE was told that providers and their representatives put a high value on maintaining alignment between the arrangements adopted for the ROM and the ESG as a critical element of eligibility to participate in the Bologna Process and other European collaborative activities. Accordingly, one aim of Verification is to enable providers to assess the extent to which their internal arrangements are consistent with Part 1 of the ESG – particularly since the overlap between the Quality Code and Part 1 of the ESG is not exact (see below).

What will Verification look like?

The contract for Verification (which has been assigned to QAA) describes it as a desk-based exercise that is to be officer-managed but undertaken by peer-reviewers. For those who can

remember it, the desk-based review of doctoral training arrangements that QAA undertook some years ago for the Research Councils may provide some pointers.

Our guess is that Verification will be based on a reporting framework against which each provider will be expected to construct a descriptive and analytical account of the full range of its periodic review and annual monitoring arrangements (see below), together with an explanation how the information from monitoring and periodic reviews is provided to its senior academic body and its governing body, and how each uses the information to assure itself that its own expectations and national expectations are being met. Whether supporting evidence will need to be supplied to support the descriptive account remains to be seen.

How should a provider plan for the Verification exercise?

Clients have asked us what they should expect to provide. Our response (based on our analysis to date of HEFCE's published pronouncements) has been to advise them to think holistically (see below). As we have understood it, the core purpose of the ROM itself is shift much of the focus of external quality assessment from internal quality assurance review processes, designed to meet the Expectations and Indicators of the Quality Code, to the outcomes of internal reviews and how they are used by providers' senior academic and governing bodies to assure the academic experiences of students, their enhancement, and the security and enhancement of students' outcomes. That being the case, we think Verification is likely to require HEFCE and QAA, as a first step to define two key terms: 'student academic experience' and 'internal review' and that the scope of Verification will depend on the definitions that are adopted.

'Students' academic experience'

The ROM uses the term 'student academic experience' without defining it. HEPI and HEA use the term 'dynamically' in their annual surveys into 'The Student Academic Experience', which is to say definitions vary from survey to survey. In 2015, for example they introduced 'student wellbeing' as a category and in 2016 'the gap between what students expect from their lecturer and their lecturers' perceived characteristics'; 'knowledge of access to counselling services'; and 'expectations of the time it takes academics to return assignments'.^{1,2}

This dynamic approach to the 'student academic experience' may suit HEA and HEPI but could be problematic for providers making submissions for the Verification exercise and for HEFCE, in following year-on-year improvements. We think HEFCE will want a comprehensive and settled definition of 'student academic experience' that it can use for several years and that it might use a definition that looks like QAA's term 'learning opportunities' but which goes further to include student support, representation, workload and contact hours. Watch this space!

'Internal review'

In 2015, HEFCE proposed that a provider's 'own periodic review process – which need to contain strong external elements – should be the key mechanism to improve student academic outcomes and the academic experience'.³ A later HEFCE document, issued as part of its Invitation to Tender for the contracts it let earlier this year, used instead the term 'internal review processes'.⁴ We think the difference here points to HEFCE now taking a broader view, in which the term 'internal review processes' will stand for all the forms of

¹ *The 2016 Student Academic Experience Survey*, Jonathan Neves & Nick Hillman, HEPI/HEA, 2016, <http://www.hepi.ac.uk/wp-content/uploads/2016/06/Student-Academic-Experience-Survey-2016.pdf>

² *Survey*, p.3

³ *Future approaches to quality assessment in England Wales and Northern Ireland, Consultation, HEFCE 2015/11, June 2015, paragraph 41, p.14*; confirmed in the ROM, paragraphs 84-87

⁴ ROM paragraph 87; HEFCE Invitation to Tender, Schedule 3, p.5; p.6

internal periodic review AND all the forms of short cycle or annual monitoring and review that the provider undertakes of what supports the students' academic experience.

If HEFCE does indeed take a broad view of 'internal review processes', that would point to the scope of the Verification exercise extending beyond annual monitoring and the periodic review of academic provision to include how the provider monitors and reviews its learning infrastructure, student support services, staffing and staff support, its own academic and corporate governance, and what it does with the information and data it collects. Again, watch this space!

Verification and the ESG

The contract for Verification states that summary reports on each provider from QAA must include a judgement as to whether the provider's approach to internal review meets the funding bodies' expectations and the relevant Standards of ESG (2015) Part 1.⁵ This raises the question as to which of the Standards in ESG Part 1 are relevant for the purposes of the verification exercise.

We have mentioned above that there is not an exact overlap between matters covered in the Quality Code and Part 1 of the ESG. For example, the Quality Code does not include a Chapter that explicitly focuses on the provider having a policy for quality assurance, for the recruitment and development of teaching staff or for 'student-centred learning'. Each of these areas is to some extent implicit in various Chapters of the Quality Code but, given the prominence that providers have given to the ESG in their responses to HEFCE's various consultations on the ROM, the inclusion of the ESG Part 1 in the Verification exercise must be welcome.

Conclusion

We had hoped by now to have heard more from HEFCE and QAA about the shape of Verification – if only to check whether we have understood the current direction of travel – but we are pretty sure that we have correctly identified some of its key features. Time will tell.

More generally, we think that providers might usefully take the opportunity that the Verification exercise presents, together with its references to Part 1 of the ESG, to consider whether their current internal monitoring and review arrangements are fit for their own purposes and governance.

Copyright © 2016 Academic Audit Associates Ltd
May be copied and reproduced for educational purposes

⁵ ROM paragraph 87 b; Invitation to Tender Schedule 3, p.11