

Regulating higher education

Risk-based approaches to quality assurance

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The year 2015 represents 25 years of institutional quality audits in the UK, introduced by the Academic Audit Unit in 1990. The Audit Unit was an initiative of the Committee of Vice-Chancellors and Principals and followed a report on quality assurance by Professor Stewart Sutherland, Vice-Chancellor of King's College London. Audits were designed to provide public confidence in higher education by reviewing '... universities' mechanisms for monitoring and promoting the academic standards which are necessary for achieving their stated aims and objectives'. The unit was funded by subscriptions from the universities and based on the principles of peer review. It established the notion that quality was a shared responsibility of higher education institutions (Williams 1992).

Since 1990 academic quality assurance has become an established component of higher education management. The Academic Audit Unit was succeeded by the Higher Education Quality Council in 1992, and then by Quality Assurance Agency (QAA) in 1997. Both organisations maintained institutional audit as the primary mechanism for reviewing institutional quality systems and procedures. Most higher education institutions have had at least five cycles of external audit, with variations and refinements in the methodology with each cycle. There is a question now about whether or not the approach remains fit for purpose.

It can be argued that there is a life cycle to quality assurance. Institutional audit had its greatest impact in the first cycle when institutions reviewed their own arrangements for quality assurance and put in place new systems and procedures. Over time the process of audit has become less effective as quality assurance has become embedded within institutional practice and the methodology became both familiar and predictable.

The government's White Paper (BIS 2011), 'Students at the heart of the system', signalled a new approach to quality assurance in England based on the principles of risk:

We will introduce a risk-based quality regime that focuses regulatory effort where it will have the most impact and gives powers to students to hold universities to account. All institutions will continue to be monitored through a single framework but the need for, and frequency of, scheduled institutional reviews will depend on an objective set of criteria and triggers, including student satisfaction, and the recent track record of each institution (BIS 2011: 37)

QAA introduced a revised method in 2013–14 for the current cycle of institutional reviews in England, based on a specification defined by the Higher Education Funding

Council for England. Called ‘Higher Education Review’ the method has attempted to reflect expectations of proportionality and risk by:

- Introducing differential interval between reviews. Four years for institutions without a long track record in quality assurance and six years for established institutions.
- Varying the size of the team and the duration of the review to reflect the evidence of sound quality management, although other factors are also taken into account including size and complexity of provision.

There is insufficient evidence of the impact of these changes at this point in time. In the first year of operation only two higher education institutions were involved. The reviews were mainly of further education colleges with higher education provision. Some have questioned whether the developments have gone far enough in addressing track record in quality assurance and the differences in the types of institutions.

There are, however, a number of challenges in designing a ‘genuinely risk-based approach’:

- A differential model of quality assurance necessitates the categorisation of institutions on an assessment of risk. Following the history of quality assurance in England most, if not all, institutions will expect to be in the low risk category. Anything else will impact on reputation and may influence their ability to recruit students. Decisions about categorisation taken by QAA, or any other organisation are likely to be controversial and may be open to challenge. By defining an institution as anything other than low risk implies a pre-judgment on an institution before a review is conducted. The specification of categories may also be problematic, particularly around the borders of each category, where marginal differences between institutions may result in different outcomes.
- Linked to this is the identification and selection of appropriate metrics that will be recognised as objective measures that allow for the assessment of risk. Quality audit has been a qualitative, rather than a quantitative assessment, based on the experience and knowledge of competent peer reviewers who have an understanding of academic standards and the quality of learning provision. It is notoriously difficult to represent quality in numerical terms, not least because there are no formal national assessments of student achievement which could represent output measures. Each degree-awarding institution is its own assessment body and sets its own standards. Attempts to use metrics in other countries have run into difficulties, most notably in Australia where the established institutions have had concerns about the assessment of risk. The use of surrogate measures, such as the National Student Survey and student withdrawal rates, only provide a partial view of standards and quality.

- The language of risk is also in itself a problem. The intention of risk-based models of regulation is to develop methods of assurance that are proportionate, that focus attention on institutions that may, through lack of track record or previous difficulties, represent more of a risk to quality and standards. However, for some the use of the term ‘risk’ implies that higher education in England is inherently ‘risky’, that there are problems that require investigation. The idea runs counter to the original intention of the Academic Audit Unit which was to promote public confidence in the security of academic standards.
- Existing methods of quality assurance identify both areas where improvements can be made as well as features of good practice that may be disseminated more widely across the higher education sector. Adopting a more proportionate methodology would offer less opportunity for publicising what institutions do well and demonstrating innovations in teaching and learning.

Applying the principles of risk-based quality assurance to higher education in England raises some questions and challenges, but the fundamental issue of developing a more appropriate methodology for a sector that has a well established track record in the management of quality, remains. Rather than looking at ways of amending existing approaches it may be necessary to go back to first principles and consider alternative models for addressing public confidence in higher education.

References

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