

Tertiary Quality Enhancement Review (TQER): Analysis of Sector Consultation - Responses and Decisions

October 2024

Introduction

What we consulted on

QAA sought views on the proposal for the new external review for Scotland's colleges and universities - Tertiary Quality Enhancement Review (TQER). The consultation was open for eight weeks from 8 July 2024 to 2 September 2024. Respondents were asked to read the proposed *Tertiary Quality Enhancement Review: Guide for Institutions* (the Guide) and respond to an online survey.

The consultation survey comprised 19 questions. Two questions sought comments only. Seventeen questions were a combination of closed response questions and sought further comments. Information on respondents was sought in the opening question.

QAA is grateful for the sector's support of the TQER development in a way that has been collaborative and constructive, and for its continued support through its response to the consultation survey.

About TQER

The Tertiary Quality Enhancement Review (TQER) method was commissioned by the Scottish Funding Council (SFC) as part of developing the new <u>Tertiary Quality Enhancement</u> <u>Framework (TQEF)</u> for provision delivered by colleges and universities in Scotland.¹ The TQEF vision is for a more coherent and streamlined tertiary education system that supports institutions in delivering the best learning experience for students.

TQER is a peer-led, enhancement-focused approach to review. It contains the flexibility to support different institutional contexts, modes of delivery and levels of learning. Taken together with the wider framework, TQER is intended to support assurance and

¹ For ease of reading, the term 'colleges' is used to denote all Scottish colleges and the term 'universities' is used for universities and small specialist higher education institutions without degree awarding powers. The collective term 'institution' is used to denote all the above.

enhancement of academic standards and the quality of student learning experience.

Led by QAA Scotland, TQER was co-created with staff, students, stakeholders and quality agencies from across the tertiary sector, beginning in May 2023 and over academic year 2023-24. Guided by a sector Advisory Group, extensive work was carried out over this period with colleges, universities, and students to design and develop the TQER Guide (*Tertiary Quality Enhancement Review: Guide for Institutions*).

Respondent information

There were 28 responses to the online survey, along with additional separate response in the form of a letter from Universities Scotland.



Analysis of responses and decisions

Several of the responses comprised:

- requests for further clarity regarding specific aspects of the method, and
- feedback which indicated that the content of the Guide had been misunderstood or misread.

Feedback in these categories was addressed through additions and revisions to the Guide text to enhance clarity, and the provision of a TQER FAQ document. This is not detailed further in this report.

A small number of responses comprised feedback that, if acted upon, would compromise the terms of the Scottish Funding Council (SFC) commission - for example, that would result in non-compliance with the European Standards and Guidelines (ESG). Therefore, these were not acted upon and are not detailed further in this report.

The following sections of this report provide an analysis of respondent information and of the closed and open question responses for each of the 19 questions.

Single approach

Question 1: Does the method, as proposed in the Guide, enable a single approach to quality review across colleges and universities in Scotland?



Survey respondents generally agreed that the proposed method is fit for this purpose, subject to flexibility and contextualisation. Respondents highlighted the need to ensure that the process reflects the distinct characteristics of both colleges and universities. The inclusion of students as partners in the process is seen as crucial. Several respondents voiced uncertainty about the practicalities of implementing the new method and suggested that the process may need reflection and refinement as the cycle progresses.

QAA response

TQER has been co-created with staff and students across Scotland's tertiary institutions to ensure that the method is sufficiently flexible to reflect an individual institution's context or circumstances. We are committed to supporting providers to transition to TQER and will put in place guidance and briefings to support both colleges and universities in this regard.

We are also committed to continuous improvement through the monitoring and evaluation of our review methods. QAA will monitor and evaluate the operation of TQER on an ongoing basis and undertake regular evaluation of the effectiveness of the method. This is intended to encompass all stages of the review process, support QAA in delivering the method effectively, and inform the ongoing development of the method in the wider context in Scotland and ESG.

Quality assurance and enhancement

Question 2: Does the method outlined in the Guide enable a peer-led model that supports both quality assurance and enhancement?



Respondents generally replied positively to this question. Specific positives include:

- the peer-led nature of the method
- its focus on moving beyond minimum standards to promote continuous improvement
- the deepening of engagement with the student body

- the alignment with the previous Enhancement-led Institutional Review approach
- the opportunities for institutions and review teams to 'check and monitor' quality mechanisms.

While noting that the composition of the external peer-led review team will include those with current expertise or management experience in learning, teaching and assessment, respondents also noted that the selection and training of peer reviewers, especially those unfamiliar with specific parts of the sector, will be critical for ensuring the model's success. Respondents also noted that the peer review process will support collaboration between colleges and universities and the sharing of good practice to support quality enhancement.

QAA response

External peer review supports institutional capacity building. It allows a college or university to benefit from an outside perspective and get feedback from others working in the same environment. Having a network of peer reviewers from across colleges and universities, and beyond, also allows for continuous professional development of those staff and students undertaking reviews and sharing of practice, through those reviewers, back to colleges and universities, therefore benefiting individual institutions and the whole sector.

External peer review ensures and provides external assurance that the quality of the teaching and learning and the experience that students get in Scotland's colleges and universities is of high quality and that together we continue to make improvements in every college and university individually and across Scotland, both now and for the future.

Student engagement and experience

Question 3: Does the method as proposed, enable effective student engagement in review (think about partnership and delivery of review as well as engagement throughout the review) and enable full insight of the student experience?



Survey respondents generally agreed that the proposed review method encourages robust student engagement, placing students at the centre of the quality review process. They highlighted the positive role of students as key partners. The need for a flexible approach - accounting for the specific contexts of different institutions, particularly regarding timing and training requirements - was emphasised.

The introduction of the Lead Student Representative (LSR) role was generally welcomed as a step toward formalising student inclusion, although concerns were raised about the potential burden placed on the person in this role, as well as a request for more clarity about how other students could contribute to the process. There were also concerns about ensuring that student representatives are properly trained and supported.

QAA response

In response, we have adjusted the language in the relevant paragraph to clarify that responsibility for contact is shared by QAA, the Quality Contact and the LSR. QAA will work flexibly and proportionately with institutions and students to make the LSR role work as effectively as possible in a range of contexts.

We recognise that the level of engagement a LSR will have with TQER will vary from institution to institution depending on the nature and size of the institution and of the student body. QAA will be supportive of this and provide training, advice, and guidance to support the LSR. We will also work with sparqs to ensure that LSRs (and students' associations more generally) are appropriately trained and supported in the period up to and during the review. Training will be developed along with guidance documents.

Flexibility and institutional parity

Question 4: Is there flexibility in the method as proposed to ensure parity across different provision and institution types?



Responses to this question were mixed. Respondents who were supportive praised the timing of the scoping and contextualising element of the method, viewing this as critical given the diversity of the sector. Others cautioned that flexibility would only ensure parity if the method was implemented as presented. Some respondents suggested that the method be evaluated, and revised, if necessary, after the first two reviews had been successfully concluded to gauge how the flexibility was working in practice.

QAA response

Contextualising each review will ensure parity between institutions. As noted above, we are committed to continuous improvement through the monitoring and evaluation of our review methods although there will need to be a further consultation for any major changes to the review process. The focus of the review on the provider's strategic approach through its own priorities is hoped to minimise the potential of disadvantaging providers that are reviewed earlier in the cycle.

Equitable participation

Question 5: Does the proposed method enable equitable participation in review?



This question also received a mixed response. As with the previous questions, respondents

commented positively on the method as written, noting that the work undertaken to contextualise and tailor each review should, in theory, support equitable participation - but cautioned that how this works in practice will depend on capacity (again, capacity building in college students' associations was raised) and other factors such as achieving engagement across multiple campuses. It was felt by some respondents that there is a risk of the method becoming 'two tier' due to, for example, universities having prior experience of enhancement-led review whereas colleges have not.

QAA response

Tailoring a review to an institution's context, while ensuring consistency of the approach across the review method, is intended to support institutions in gaining optimal value from the process by enabling focus on the areas that will be the highest priority for them. This, along with ensuring student engagement in the review process will enable equitable participation.

Institutional enhancement

Question 6: Does the TQER method proposed support institutional enhancement and a culture of continuous improvement?



This question received a generally positive response, although some respondents commented that its success will be dependent on how well institutions are able to embed the TQEF principles. Some respondents commented that the relatively long review cycle made other parts of the TQEF - such as the Annual Quality Engagement - an important component in assuring that quality processes remained robust and consistent.

QAA response

TQER is an enhancement-led approach, through which institutions identify ways in which learning and teaching and the student learning experience may be improved, even when baseline expectations have been met. The enhancement culture in Scotland places emphasis on engaging well beyond the baseline, inspiring excellence.

TQER is tailored to the context of the institution. Institutions, through their Strategic Impact Analysis (SIA), identify current strengths and strategic intentions and plans for enhancement under each of the four TQEF principles. The use of Advance Information Set (AIS) and SIA provides both baseline assurance and opportunities for an institution to reflect on enhancement that can then be further explored through the review itself.

Balance between assurance and enhancement

Question 7: Does the overall approach proposed provide an appropriate balance between assurance and enhancement?



Most respondents agreed that the approach provides an appropriate balance between assurance and assessment. Respondents appreciated:

- the clear definitions of quality assurance and quality enhancement within the documentation
- that the new methodology is clear and builds upon the enhancement approach used up to now
- that the approach and comprehensive evidence base provided within the SIA, Self-Evaluation and Action Plan (SEAP) and AIS demonstrates an appropriate balance between assurance and enhancement and will support a deeper and more meaningful engagement with enhancement.

QAA response

TQER has been developed through extensive consultation with colleagues from colleges, universities, and other organisations across the Scottish tertiary sector to ensure that it is fit-for-purpose and facilitates the appropriate review of both assurance and enhancement.

The 2024 UK Quality Code (the Quality Code), as a reference point, provides the foundations for quality assurance and supports and enables the enhancement of internal quality practices. It offers a framework upon which to measure the effectiveness of quality assurance and identify areas for enhancement.

TQER is particularly interested in the institution's strategic intentions and its plans for enhancement that takes account of the diversity of provision and will explore the impact of the planned changes on the student learning experience as part of that review.

Alignment to the TQEF

Question 8: Does the TQER method, as proposed, support institutions to demonstrate their alignment to the principles of the TQEF? You may want to consider the range of activities across the review, including scoping, initial visit, review visit and reporting.



Respondents generally agreed that the TQER method aligns well to the principles of the

TQEF. They noted:

- the approach provides multiple opportunities for institutions to demonstrate alignment with, and fulfilment of, the principles
- the scoping visit helps to identify the context of the institution and the specific focus of the review, which can help to map institutional initiatives and processes to the TQEF principles
- the AIS will provide much of the evidence to show alignment with the TQEF
- evidence types are clearly mapped against the Quality Code principles, making it clear which evidence will support measuring engagement with the TQEF
- the involvement of students in the process and use of the Student Learning Experience (SLE) model will show clearly where their voice fits in and demonstrates partnership in the reviews.

The tables within the Guide were noted as being very useful and will aid institutions to identify ways in which it can provide information on practices.

QAA response

The tables within the Guide provide a framework of questions that the review team will ask itself as a reference point. It is important to note that they are not prescriptive questions that will be asked as part of the review. They have been structured around the TQEF principles and corresponding bullet points. The relevant sector-agreed principles of the Quality Code are provided to support review teams and institutions in considering institutional alignment with the Quality Code.

The SIA allows the institution to undertake a self-evaluation that sets out for the review team an overview of their operating context and strengths and opportunities for further development in the context of the TQEF principles.

Public confidence

Question 9: Will the outputs of TQER provide information useful to institutions and present a basis for public confidence?



Respondents mainly agreed that the TQER provides information that is useful to the institution and the public:

- A combination of the overarching judgement with identified areas of good practice and recommendation will be informative for institutions for internal quality and enhancement purposes, and provide confidence for the public, giving a picture of the institution's strengths and areas for improvement.
- Published reports will provide an understanding of sector-wide trends and good practice.

Respondents agreed that the format of judgements is clear, and it was suggested by one respondent that the detailed findings of TQER may provide added public confidence.

QAA response

QAA has made it clear in the Guide that judgements, recommendations, good practice and a credible action plan combine to confirm whether there can be public confidence in the institution's qualifications and in the quality of the learning experience it provides for its students.

External reference points

Question 10: Do you consider that the external reference points used for TQER help outline expectations of institutions and provide a supportive basis for review?



Respondents considered that the external reference points included in the Guide were those that they expected to see, with the list being comprehensive giving the tertiary sector a wide range of benchmarks. The compliance with ESG was noted as being particularly welcome, giving Scottish institutions a formal alignment with standards set across Europe.

Several respondents noted that the 2024 Quality Code has been published recently and will take time for the sector to become familiar with its contents. In addition, several comments noted that the use of the Quality Code is a new development for the college sector, and they will need support in embedding this within their cultures and processes.

Some respondents noted that alignment with the SLE model is a new development for the sector and will require support in embedding it in their ways of working.

QAA response

As part of identifying its strategic approach to enhancement and evaluating its current policy and practice, institutions are expected to make use of a range of external reference points. Institutions have flexibility in identifying the full suite of reference points that are relevant to their strategic vision, context and student population. Institution adherence to relevant reference points will be explored during TQER.

TQER incorporates the Quality Code as a reference point and organises the AIS under the principles of the Quality Code to meet ESG guidelines. While entitled the UK Quality Code for Higher Education, the Quality Code is written to be applicable to colleges as well as universities. Institutions may utilise a range of approaches to demonstrate how the Quality Code sector-agreed principles apply in their context; this could include a mapping or use of the Quality Code as a reflective tool. Advice and guidance, currently being produced by QAA, will have input from colleagues in Scottish colleges. QAA will deliver information sessions about the Quality Code for college and universities during academic year 2024-25.

The new TQEF intentionally places students at its centre. sparqs has developed the SLE model to help institutions achieve and demonstrate successful approaches to their engagement with students throughout the learning journey and will work with QAA to support

institutions in evidencing this.

Evidence base

Question 11: The evidence base is made up of a Strategic Impact Analysis, Advance Information Set and evidence from other sources. Does the submission of the evidence base for TQER support an institution to demonstrate that it meets sector expectations in managing academic standards, enhancing the quality of the learning experience it provides and enabling student success?



Respondents agreed that the evidence highlighted in the TQER meets sector expectations and supports the review method. They noted that the SIA is a critical document that will allow institutions to present a coherent narrative to review teams and that the evidence within the AIS provides a comprehensive data set to support institutions to demonstrate operational aspects and the quality of their provision. It was also noted that there is plenty of scope for students' associations to contribute to the evidence.

Some respondents requested further insight into the analysis of SFC datasets, how these relate to internal datasets and what opportunities there may be for institutions to provide more up-to-date data at the point of review.

QAA response

QAA recognises that some providers will be more confident about working within the parameters of the AIS. QAA will provide guidance to reviewers and QAA Review Managers on the evidence expectations through training.

We have made an amendment to the TQER timeline so that SFC datasets will be provided to QAA and the TQER review team eight weeks before the Initial Review Visit. The data will also be shared with the institution.

Demonstrating effectiveness

Question 12: Do you consider that the indicative evidence sources suggested, the range of engagements outlined for review visits and the questions to which the review team will seek answers, give institutions sufficient opportunity to demonstrate effectiveness against the TQEF principles?



Respondents noted that the evidence base is large and comprehensive and will accommodate the variety of institutions within the Scottish tertiary education sector and enable them to demonstrate effectiveness against the TQEF principles.

The guidance on the documentation was found to be clear. The opportunity of tailoring the review specification through the scoping meeting was noted, as was the flexibility of the review to focus upon different activities and functions at the institution.

QAA response

The review team will look at an institution's effectiveness in meeting the principles of the TQEF. They will do this across the course of the TQER event (that is, from submission of the SIA and AIS to the end of the review visits and finalisation of the report) seeking evidence demonstrating an institution's effectiveness against the principles of the TQEF.

QAA has more closely aligned the content of the tables in the Guide that provide the framework of questions that the review team will ask itself as a reference point and indicative sources of evidence with the sources of evidence set out in Annex E: Advance Information Set. The revised Guide will support an institution, through its SIA and AIS in demonstrating effectiveness against the TQEF principles.

Review team composition

Question 13: Do you consider that the composition of review teams as proposed (Annex G: Review team size and composition) and the use of a specialist and/or international reviewers will ensure that a review team will be sufficiently tailored to understand the context of an institution and have the relevant knowledge and experience to undertake the review?



Positive comments related to the tailoring of the review team to each institution's context, and the ability of the institution itself to help shape that team through the scoping meeting.

There was an acknowledgement of the importance of the QAA Review Manager role in ensuring standardisation across reviews and challenging and supporting the review team around points of disagreement.

There was a request for further clarity around the different reviewer roles with some commenters not understanding the distinction between reviewer, specialist reviewer and international reviewer as used in the Guide.

There was some ask for reassurance that the review teams will contain the right range of expertise and experience required to review institutions - this particularly coming from college respondents who were seeking reassurance that reviewer would have a college background. Commenters also highlighted the need for comprehensive training for reviewers, particularly student reviewers.

Most commenters agreed that a review team of four to six reviewers is the right size to cover all institutions' needs, although some comments did suggest that larger review teams may be preferable for more complex institutions.

QAA response

Discussions at the scoping meeting will inform the size and composition of the review team. Collectively, the review team will have experience and knowledge aligned with the outcomes from the scoping exercise and the composition of each review team will be tailored to the institution to ensure the review team has the relevant knowledge and experience to undertake the review. This will take into consideration factors such as, the type of institution, type of provision, and size and type of collaborative provision.

Review teams will be supported by a QAA Review Manager, who will also be the key liaison point for the institution during the review. Judgements are the responsibility of peer reviewers, while the management of a review is the responsibility of QAA Review Managers.

QAA Review Managers have responsibility for ensuring that the review team reach a consensus and that the review team's judgements are aligned with the judgement criteria for the method and are consistent with the evidence available to it. They are responsible for ensuring that the wording of any recommendations or features of good practice identified by the review team are appropriately specific and precise and are consistent with the aims and parameters of the method.

The Guide includes definitions of each of the categories of reviewer. International reviewers fall into the specialist reviewer category as they may be appointed to a review team from outside of the UK.

To give reassurance that review teams will contain the right range of expertise and experience required to review institutions, QAA has amended the Guide to include that review teams will be tertiary in their make-up, comprising team members with experience drawn from those with both college and university sector experience and that for each review it is expected that the majority of the team will be drawn from reviewers with current experience of the type of institution under review.

Review team members are given access to the SIA and AIS eight weeks in advance of the Initial Review Visit. This gives a team of four adequate time to review all documentation, form lines of enquiry and develop a schedule of activity ahead of the Initial Review Visit. Additionally, the QAA Review Manager, considering the experience and background of team members, allocates and oversees the tasks carried out by the review team, setting duties and deadlines in accordance with the requirements and timescales of the method, and monitoring their timely completion.

Credit rating

Question 14: Do you consider the process as proposed in TQER an effective mechanism to consider the assurance and continuation of credit rating in colleges and universities?



Positive comments welcomed the streamlining of the approach, removing the requirement for a separate review of Scottish Credit and Qualifications Framework (SCQF) credit rating

processes, although other commenters sought assurance that the approach did in fact remove any duplication.

QAA response

The Guide is clear that TQER will be the mechanism through which credit rating activity for the SCQF for colleges and universities is tested, replacing existing processes. Through TQER, it will be confirmed that appropriate arrangements are in place for credit rating, vetting and confirmation processes, as well as the ongoing monitoring of credit rated provision and third parties. SCQF will subsequently confirm an institution's status to continue as a credit rating body. As part of the review process, certain documents, as outlined in **Annex E: Advance Information Set** of the Guide will be shared with SCQF Partnership (SCQFP) and SCQFP officers will provide the review team with a desk-based analysis of the documentation based on the requirements of the SCQF principles and best practice. The desk-based analysis will form an additional evidence source for the review team.

Criteria and indicators for outcomes



Positive comments found the judgements to be robust, clear, and comprehensive. There was some request for further detail around the indicators for each judgement as the current descriptions were felt to be quite broad. This further detail would be helpful in managing and explaining marginal decisions. The risk-based approach to determining outcomes was found to be helpful.

Several comments related to the 'partially effective' judgement which was felt to be a negative judgement. Commenters requested further clarity on how 'underdeveloped or not fully embedded' plans may lead to a partially effective judgement as this had led to the perception that institutions with initiatives in development would be more likely to receive such a judgement.

Clarity of outcomes



Positive comments related to the clarity of outcomes and recommendations. That the new method acknowledges that good practice need not be 'sector-leading' was also appreciated.

While the outcomes were considered clear, there was some concern regarding the public perception of one/two-word judgements and the need for these to be contextualised. There was also a request for further clarity on how 'moderate' or 'serious' risks are identified (which feature in the criteria for the judgements of 'partially effective' and 'not effective').

QAA response to Question 15 and 16

The ways that judgements are expressed has been developed through extensive consultation with colleagues from colleges, universities and other stakeholders across the Scottish tertiary sector.

The judgement matrix helps to guide a review team in coming to consistent judgements, especially when deciding between potential outcomes. This is important to ensure consistency (the robustness, reliability and integrity) of review outcomes and fairness to institutions. An element of professional judgement will always be incorporated. As the judgement matrix is a guide; it supports but does not replace discussion by the review team with the QAA Review Manager. In addition, participation in QAA moderation processes supports individual review managers in discussing potential outcomes with review teams and applying a consistent approach to those outcomes.

Follow-up activity

Question 17: Does the Guide set out clearly what happens in follow-up activity?



Most respondents agreed that the Guide sets out clearly what happens in follow-up activity. Some respondents also requested further clarity regarding the role of the SFC in follow-up activity and student involvement. Others requested further details on the process of re-review including timescales, whether the original review team would be involved, and the criteria for desk-based re-reviews. One respondent focused on the action plan process and how its value might be increased. In relation to the action plan, there was some concern that this duplicated the Self-Evaluation and Action Plan (SEAP) (which also requires an action plan).

QAA response

The SEAP reports on an institution's existing self-evaluation activities, reflecting on the outcomes of institutional quality arrangements, supporting data and evidence and the resulting priority areas of focus and impact. The SEAP and the supporting data and evidence used to prepare it will form part of the AIS that will contribute to TQER. There is no requirement for institutions to submit a SEAP in the year that they are being reviewed as part of TQER.

More information on the purpose of the SEAP and its uses can be found in the SFC's *Guidance on Quality for Colleges and Universities 2024-25 to 2030-31*, <u>Annex B: Guidance of the Self-Evaluation and Action Plan</u>.

Any other feedback

Question 18: Do you have any further views in relation to the contents of the Guide, or in relation to these proposals that you have not included elsewhere in your response to this consultation?

Positive comments in response to this question welcomed the opportunity to provide feedback, and to shape the method. Some respondents requested that the outcome of the review be verbally communicated to the institution on the final day of the Main Review Visit. All other comments related to requests for clarity, further support in understanding the method and its delivery or for further information.

QAA response

QAA has made several amendments to the Guide because of these additional comments.

It was agreed that it was not appropriate to verbally communicate review outcomes to the institution on the final day of the Main Review Visit. To ensure consistency and judgements of outcomes across institutions, and the integrity of the method, outcomes will be communicated to institutions in the Key Outcomes letter following internal moderation.

QAA is working with the College Development Network (CDN) and sparqs to support colleges, universities, students' associations, lead student representatives, reviewers and other stakeholders in understanding and preparing for TQER. QAA has also produced a short guide to accompany the full guide and is preparing an FAQ that will address some of the consultation responses in greater detail.

Training and support

Question 19: What training and/or support do you or your institution need to enable you to effectively prepare for a TQER?

Training and support were requested in the following areas:

- Support and capacity building for students' associations, particularly around the LSR role.
- For institutions: advice and guidance on how to maximise student engagement with TQER both throughout and after a review has taken place.
- Introductory resources on TQER to use with those unfamiliar with the new quality landscape.
- Detailed guidance resources and accompanying training on compiling the evidence base for TQER (AIS and SIA).
- A TQER short guide.

QAA response

QAA will work with CDN to provide coordinated support to colleges and universities in respect of TQER. QAA will also work with sparqs to support students' associations and LSRs in preparing for TQER.

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