

1a. Please comment on the extent to which you consider that the agreed quality assurance system and HEBRG principles, set out above, provide an appropriate basis for a more risk-based approach to quality assurance.

The Institute of Physics believes that the principles are sensible and appropriate.

1b. Are there any other principles that should apply?

None.

2a. 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 agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

2b. Please explain the reasons for your answer.

The Institute of Physics agrees that a risk-based approach is sensible and appropriate given the experience within institutions of engaging with quality assurance processes. The quality assurance process should be seen as something positive and not a burden and a reduced frequency of assessment would provide an incentive to both maintain and achieve high standards. However, the Institute of Physics would suggest that the varying timescales should be limited as we would not wish to see a whole range of review periods as this could be confusing to the public and not meet the aim of transparency.

The Institute of Physics would note that the public perception of the frequency of inspections and the associated track record of institutions will require careful management. Appropriate communication of the reasons behind differing review periods will be necessary.

The possibility of investigating issues outside the regular review cycle would be welcome although quite how the mid-cycle monitoring process would work is not clear. The process should be as flexible as possible, so the option of holding a visit, or conducting a desk-based review, would appear to be appropriate. This is not dissimilar to the process the Institute of Physics currently operates in its degree accreditation process.

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 agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

3b. Please explain the reasons for your answer.

The added value of separating core and module review to a risk-based approach is not immediately obvious. Quality assurance processes should be well-integrated and there would need to be demonstrable benefits for splitting off elements into modules. It could be the case that if concern centred over an additional module rather than the core review, a later review would need to focus only on the additional module. This would serve the purpose of achieving a risk-based approach while decreasing the administrative burden of external regulation.

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.

The Institute of Physics would prefer that the interval be set at six years.

4b. Please explain the reasons for your answer.

The maximum term of accreditation awarded by the Institute of Physics is five years and we see change in most institutions over that period. Ten years is a long time in an institution and major, even structural, changes can occur well within that timescale.

The option to bring forward a review would appear sensible and may mitigate a longer timescale but it is not clear what would trigger an earlier than planned review.

The Institute of Physics supports the principle that all institutions should undergo some periodic review and that high-performing institutions should not be exempt.

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?

It could depend on whether the visit is due to a lack of a track record or because of an unsatisfactory report. If there are issues to resolve it is preferable that this be done on a reasonably swift timescale, and at least within three years, whereas the lack of a track record may require a different approach.

5b. Please explain the reasons for your answer.

Where there is a need to build up a track record, and no major issues are identified during review, there could be a sliding period that builds up to a Type B review timetable. Where an assessment has been unsatisfactory, there is an urgent need for change which should be followed up more quickly.

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?

Strongly agree/**Agree**/Neither agree nor disagree/Disagree/Strongly disagree

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?

Strongly agree/**Agree**/Neither agree nor disagree/Disagree/Strongly disagree

6b. Please explain the reasons for your answer.

At the subject level, PSRB reviews are more detailed than institutional reviews and are taken very seriously by institutions, even where the accreditation is not statutory. It is to be hoped

that the QAA could take account of the activities of PSRBs and reduce the amount of repeat drilling down to those departments that are covered by accreditation processes.

The PSRB reports provide a barometer in time as to any changes that occur. For this reason the QAA should ask for any accreditation reports from institutions, or the PSRB itself, as they occur instead of during a review.

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?

This is a problematic area; clearly student (or staff whistleblowing) complaints can form grounds for a review but there really does need to be a threshold; a single student complaining is clearly insufficient so there would need to be guidelines. It is not clear what type of annual data would be useful for this purpose. Trends over years might be but it is important to beware unforeseen consequences. As an example, if the employability of graduates is seen as something to monitor, the best way of improving average first destination employability for an institution is to lower its standards to increase the number of students with firsts and 2(i) degrees. Other examples can have similar consequences. It is worth noting that the use of the word “standards” in the document does not concur with the normal public understanding of the word and should be used carefully. It is ironic that measures that were introduced to try to improve standards may well have resulted in a lowering of academic standards, albeit with an increase in the quality of the student experience.

7b. Are there any other data or information sources that the panel should consider?

The reports from External Examiners.

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

The Institute of Physics welcomes the continued emphasis on enhancement and the desire to reduce the burden of external validation on institutions. It would be useful if the QAA could initiate a dialogue with accrediting bodies in order to better align processes and documentation so that the administrative impact of external review is reduced on departments that undergo PSRB accreditation.