

**fforwm response to
Institutional Review: Wales from 2009/10
Consultation Document: W08/31HE**

fforwm 
DROS GOLEGAU CYMRU • FOR COLLEGES IN WALES

November 2008

fforwm response to the consultation document
Institutional Review: Wales from 2009/10
Consultation Document: W08/31HE

Institutional Review: Wales from 2009/10

1. fforwm welcomes the opportunity to respond to the Higher Education Funding Council Wales (HEFCW) consultation on the core principles, general requirements and key features of the institutional review: Wales (IR) process to be adopted for higher education (HE) in Wales from 2009/10. Furthermore, all Further Education (FE) Institutions offering HE welcomed the opportunity to be part of the consultation event held in Llandrindod Wells on 21 October 2008.
2. fforwm is the national organisation representing the 23 further education (FE) colleges (including Merthyr Tydfil College, University of Glamorgan), and two FE institutions in Wales. It is an educational charity and a company limited by guarantee. fforwm's Board comprises college principals and chairs of corporations, appointed by member colleges. fforwm provides a range of services to its members including networks, conferences, research, consultancy and the sharing of good practice. It also works closely with a wide range of partners in post-16 education and training. Through fforwm, colleges are represented on various committees, working parties and other groups influencing and shaping policy in post-16 education and lifelong learning.
3. fforwm recognises that the IR will form part of the quality assurance (QA) arrangements for Wales and will be a component of the quality enhancement (QE) framework. fforwm welcomes the opportunity that will be presented in early 2009 to consult on this framework. fforwm recognises that the key purpose of the IR is to satisfy the public interest in knowing that HE institutions in Wales provide awards and qualifications of acceptable quality and appropriate academic standard. fforwm is mindful of the fact that this applies as strongly to HE in FE as much as it does to HE provision in general in the HEIs.

Principal changes proposed in the IR process from 2009/10

4. fforwm strongly welcomes:
 - 4.1 an increased emphasis on quality enhancement, building on current strengths in the IR process
 - 4.2 a greater focus on ensuring that students should have access to a high quality learning experience and that this should be a core principle of the IR process. As in FE, learners are at the heart of HE, and therefore their learning experiences should be fundamental to the IR process
 - 4.3 compliance with European requirements and guidance. The IR process should comply with the European Association for QA in HE (ENQA) standards and guidelines

- 4.4 the adoption of a risk-based approach based on previous judgements. Institutions which had gained outcomes of confidence would have a lighter touch and be reviewed at no more than six year intervals after their previous IR. However, institutions which had gained outcomes of limited or no confidence would have no more than four years' interval between IRs. In the case of institutions which had gained an outcome of no confidence, fforwm is of the view that an IR should take place within two years.
- 4.5 the enhancement of the role of the institutional facilitator. The two FEIs who were part of the IR process in 2008 regarded the role as having been most useful.
- 4.6 the inclusion of an additional student member of the review team. This strongly reflects the learner-centred principle set out in 1.2 above. In the case of the IR of HE in FE it would be helpful if the additional student had experience of the FE sector and had received training on the role of the student nominee.
- 4.7 the proposal that judgements be made on:
- the soundness of the institution's present and likely future management of the quality of its programmes; and
 - the soundness of the institution's present and likely future management of the academic standards of the awards (this of course will be a judgement of the awarding HEI)

Most FEIs delivering HE are delivering provision designed by an HEI and will therefore have no control over whether or not the "design" of provision meets academic standards.

- 4.8 the proposal that FE colleges with directly funded HE provision not covered by the other elements of the IR process should be subject to a review
- 4.9 the mid process review, i.e. institutions with a six year interval between IRs would have a mid-process review after three years. However, fforwm is of the view that, to ensure the consistency and reliability of the process, the review team that visits the institution remains largely the same for the two visits. This would be helpful to the "enhancement" aspect of the IR. It would be helpful if institutions were to receive clarification over the evidence to be reviewed at the mid-cycle review.
- 4.10 stronger links between the QAA's annual institutional visits and the IR. It is to be hoped that this would apply equally to institutions providing HE in FE.
- 4.11 reporting to consist of:

- a summary written in a manner generally accessible to a wide range of audiences including students, parents and employers; and
- a technical annex intended for institutions and those with a closer interest in QA and QE.

Other aspects of the IR process

5. Whilst fully welcoming the QAA IR process, FEIs would urge that, in future, all aspects of HE delivered by FEIs be included in the IR and not just that which is directly funded. This should broaden the IR process to include all FEIs delivering HE and help provide a more holistic assessment of HE practices in FEIs. In the two recent IRs at the directly funded institutions, only a proportion of the HE learners in each institution were included in the process. Some learners were not covered because they were not directly funded. These practices carry the risk of giving more status to some HE provision than others and is regarded by FEIs as being potentially divisive.
6. The review of HE in FE should be as non-bureaucratic as possible and not impose excessive additional burdens on FEIs. There would be considerable merit in providing training in IR processes for all providers of HE in FE perhaps facilitated and organised by fforwm on behalf of the sector. It is important that FEIs have a full understanding and appreciation of QAA processes and their similarities/differences from Estyn's approach.
7. There is a view that FEIs are simply a bolt on to HEIs' quality assurance systems. FEIs willingly respond, when prompted, to HEI requests for data but rarely receive information in return on, for example, the performance of HE-in-FE learners compared to HEI learners. Having a separate review of all aspects of HE provision in each FEI would enable institutions to develop further the quality of their HE provision (from a base of good quality evidenced in recent QAA visits and reports).
8. FEIs warmly welcome the use of National Student Surveys (NSS). However, it is important that FEIs and other agencies are able to disaggregate FEI from HEI learner perceptions. Unlike practices in England, most FEIs in Wales are not at present included in NSS. Data on student perceptions should be available to FEIs, preferably at the level of courses/programmes of study. At present any HE in FE data is subsumed into the performance statistics for the HEI partner which renders any meaningful comparisons and analysis practically impossible. FEIs make extensive and effective use of benchmarked survey data which allows the data to be analysed from course to sector performance. In addition, fforwm would urge much greater transparency in the use of Key Performance Indicator data. FEIs make extensive use of completion, attainment and successful completion data which are not a prominent feature of benchmarking in the HE sector. If the IR process is to be one of quality enhancement there needs to be open and transparent access to accurate, reliable and comprehensive data sets. In this context, fforwm does not agree that judgements on: "the reliance that can reasonably be placed on the accuracy, integrity, completeness and frankness of

the information that an institution publishes about the quality of its programmes and the standards of its awards be replaced with a comment”.

Conclusion

9. fforwm, as outlined in section 1, welcomes the majority of the principal changes proposed in the IR process from 2009/10. Adoption of the core principles, general requirements and key features of the IR process will satisfy the public interest in the quality and academic standards of HE awards and qualifications in Wales. The new processes should also help maintain comparability of outcomes in Wales with other countries of the UK and compliance with European requirements and guidance.
10. FEIs have a central role to play in delivering the learning opportunities needed to meet the higher skills needs of the economy of Wales. The consultation document focuses mainly on the learning of full-time under-graduates. Greater attention needs to be given to the appropriateness and effectiveness of learning opportunities for part-time HE students who are the main focus for the work of FEIs in their provision of HE. fforwm would strongly urge that, with the likely future wider development of Foundation Degrees, a more holistic view be taken of HE in FE provision. The present focus on directly funded provision gives insufficient recognition of the contribution of FEIs to the higher skills needs of the workforce in Wales.