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QUALITY, RISK AND REGULATION

COLLABORATIVE PROVISION AND EMPLOYER ENGAGEMENT IN HIGHER EDUCATION



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FOREWORD

A high-quality higher education sector is vital for the future long-term competitiveness and resilience of our economy, its businesses, and its people. Recognising this, over the last few years and in partnership with further education colleges, employers, and private providers, the sector has been encouraged to increase the scope and scale of provision to widen participation, underpin workforce development, and to enable provision to be increasingly workplace-centred. All this has been required at one and the same time as the sector has continued to build its reputation – nationally and internationally - for high quality learning, delivered to a consistent standard across a wide family of institutions.

With the sector as a whole due to consult on a revised quality assurance framework in the coming months, it will be important for any new regime to recognise the twin challenges in continuing to diversify provision whilst assuring students and the wider public that quality and consistency are being maintained and enhanced.

To help inform the forthcoming debate, and drawing on our recent work to review collaborative provision and the development of employer-responsive higher education, we offer in this Viewpoint our take on the key issues as a new framework beckons. We identify the challenges and risks in taking this exciting but demanding agenda forward, and offer some good-practice insights and suggestions of what has worked well, and why.

I hope you enjoy reading this Viewpoint, and that its content will be helpful in informing your own thinking and discussions as consultation over a new quality assurance framework progresses. And do let us have any thoughts or feedback you have on what we have written – we'd find those helpful and beneficial.

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VIEWPOINT SERIES - FEEDBACK AND MAILING LIST

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EXECUTIVE SUMMARY

Quality assurance (QA) in higher education (HE) is rising up the political and policy agenda again, following criticism of the current approach in the recent *Students and Universities Select Committee* report.¹ Higher education sector bodies are clear that there is no evidence of systemic failure in the current QA system, but have committed to consulting on a revised, more flexible approach to accommodate the changing nature of HE and the challenges faced by the sector.

In this Viewpoint, we draw on work by SQW Consulting on the review of collaborative provision and the role of QA in employer engagement to identify some of the critical risks and QA issues for HE providers to consider when developing these types of programmes. We provide some examples of successful strategies adopted by higher education institutions (HEIs) and their partners and set out a way of identifying the key QA questions for institutions to ask themselves when developing more innovative, employer-responsive programmes.

We also reflect on the wider QA challenges facing the HE sector and the tensions between a policy drive to continue to diversify HE programmes and providers, while maintaining a high quality student experience, broadly comparable standards and a strong global reputation.

While many in the sector have called for a more risk-based approach to quality assurance, there is no clear consensus on what this approach might mean in practice. The notion of a continuum of risk needs to be considered and developed further. There may also be some unintended consequences of such an approach. It might lead to HEIs becoming more risk averse and withdrawing from innovative, collaborative arrangements at a time when other HE policy drivers are encouraging new ways of working. Preventing such behaviour, and also learning from thriving collaborative provision and effective employer engagement, must be priorities for the development of a more responsive and flexible HE QA system for the future.

[1] *Innovation, Universities, Science and Skills Committee (July 2009), Students and Universities*
– available at: <http://www.publications.parliament.uk/pa/cm200809/cmselect/cmduis/170/170i.pdf>

THE FUTURE OF QUALITY ASSURANCE IN HIGHER EDUCATION

In August 2009, a common statement² on the future development of the QA system for HE in England and Northern Ireland³ was issued by the sector's representative⁴, funding⁵ and QA⁶ bodies. It confirmed that the current cycle of institutional audits for HE institutions (HEIs) would be completed in 2010-11 and the Integrated Quality Enhancement Review (IQER) process for further education colleges (FECs) providing HE would conclude the following year. The various bodies have begun working together to draw up a consultation for the HE sector on the principles, purposes, outputs and outcomes of a successor QA system and have affirmed their commitment to

... a quality assurance system which is accountable, rigorous, transparent, flexible, responsive and public facing. We want to tackle concerns about quality and standards, and make real changes to improve the student experience and the reputation of HE.

This statement followed the publication in July 2009 of the *Students and Universities*⁷ report by the former Innovation, Universities, Science and Skills Committee.⁸ This was highly critical of the current system and called for significant changes to the role of the HE sector's Quality Assurance Agency (QAA), with a shift away from looking at processes towards an overt focus on standards. Whether the Committee's views were fully justified or not, QA in HE has clearly moved back up the policy agenda.

Earlier in 2009, the QAA itself completed a series of thematic enquiries into some areas of concern about

academic quality and standards in HE in England. The enquiries covered five key topics: student workload and contact hours; English language requirements for international students; recruitment practices for international students; the use of external examiners; and assessment practices. These particular areas had been identified as ones which had attracted a relatively high level of media coverage over the summer of 2008.

The thematic enquiries report stated that media coverage and ongoing discussion of certain themes did not mean that there were widespread and substantiated concerns about a particular area or any major systemic failure. It highlighted the lack of a common understanding amongst the media and wider public on what the terms 'academic standards' or 'academic quality' actually mean, despite the fact that the current Quality Assurance Framework (QAF) identifies the levels of achievement required for particular types of award and provides subject benchmark statements. The report suggested that the key HE bodies and stakeholders needed to develop more effective mechanisms for communicating

... a common and shared understanding of the principles and purposes of a broad Quality Assurance Framework for assuring public confidence in the setting and management of academic standards and quality.⁹

A sub-committee of HEFCE's Teaching Quality and Student Experience Strategic Committee, comprising the key partners involved in the common statement, has investigated and reported further on these concerns.¹⁰ It has concluded that while there is no evidence of a systemic failing in quality across the HE sector, further work is required on the topics identified by the QAA's enquiries. The sub-committee's report noted the following:

[2] Available at: <http://www.hefce.ac.uk/learning/qual/statement.asp>.

[3] The HE sectors in Scotland and Wales have their own, separate quality assurance frameworks.

[4] Universities UK, GuildHE, the Association of Colleges (AoC) and the National Union of Students (NUS).

[5] The Higher Education Funding Council for England (HEFCE) and the Department for Employment and Learning Northern Ireland (DELNI).

[6] The Quality Assurance Agency for Higher Education (QAA).

[7] Innovation, Universities, Science and Skills Committee (July 2009), *Students and Universities* – available at: <http://www.publications.parliament.uk/pa/cm200809/cmselect/cmndius/170/170i.pdf>.

[8] Now replaced by the Business, Innovation and Skills Committee.

[9] QAA (April 2009), *Thematic enquiries into concerns about academic quality and standards in higher education in England*, p. 5.

[10] HEFCE (October 2009/40), *Report of the sub-committee for Teaching, Quality and the Student Experience*

The QAF requires a number of changes to provide HEFCE with continued confidence that it is fulfilling its statutory responsibilities and for the sector to be able to demonstrate its high quality and standards. In particular, any quality assurance method needs to be more flexible than is currently the case, to be able to adapt to the continually varying context and challenges that the sector faces.¹¹

As well as being a topic of some considerable current debate, the QAF has also been under a sustained period of review by the former Quality Assurance Framework Review Group (QAFRG), which began its work in 2004. This work has taken place in three main phases, reflecting the incremental implementation of the QAF itself. In Phase 1, the review group focused on the overall impacts, benefits and costs of QAA institutional audit. This work led to some streamlining of the audit process, replacing discipline audit trails with a more flexible method. Phase 2 of the work evaluated Teaching Quality Information (TQI) and the National Student Survey (NSS), again leading to some changes of approach. The qualitative information on the TQI website was found to be largely redundant and was dropped as a requirement; and a more user-friendly and student-focused website was developed and launched (see www.unistats.com). The third and final phase of the review, which commissioned a study from SQW Consulting, considered the impact of the review of collaborative arrangements on HEIs. This concluded that many institutions were in favour of a more risk-based approach to the review of collaborative provision, although there was no clear consensus as to what such an approach might comprise.

ACCOUNTABILITY AND AUTONOMY

The current QAF was developed in 2001 in recognition that the burden of QA in HE was disproportionate and should be reduced. The

framework is predicated on the primary responsibility of autonomous HEIs to operate their own robust internal QA processes, while also recognising the proper demands of public accountability¹² and the need to provide reliable and consistent public information. Prior to this, two separate review processes were operated: institutional audit, with a focus on institutional management of quality; and subject review, which considered quality and standards on a discipline basis.

The current framework comprises the following key elements:

- institutional audits by QAA which lead to overall judgments of 'confidence', 'limited confidence' or 'no confidence'
- additional collaborative provision audits (CPA) for HEIs with 'large and complex' collaborative arrangements
- publication of teaching quality information (TQI) for potential students and wider society which provides a range of data including: student continuation rates; graduate employment destinations; and the results of the NSS.¹³

Higher education delivered by FECs is subject to a separate process, Integrated Quality and Enhancement Review (IQER). The summative aspect of IQER leads to similar judgments to those provided by institutional audit in HEIs.

Underpinning the QAF is the Academic Infrastructure (AI) which is designed to provide a 'way of describing academic standards in UK higher education and the means by which these outcomes are achieved' (see Figure 1 page 6).

In addition to the elements of the QAF and its associated AI, HEIs undertake their own internal QA reviews and draw on the expertise of external examiners to provide comparative judgments on standards.

The 2002 Better Regulation Task Force report¹⁴ stimulated further work to streamline and co-ordinate QA reviews and to revise and simplify

[11] *Ibid*, p. 46.

[12] The 1992 Further and Higher Education Act places a statutory duty on the HE funding bodies to make provision for the assessment of the quality of education provided by the institutions they fund.

[13] Available at: www.unistats.com.

[14] Better Regulation Task Force, (July 2002), *Higher Education: Easing the Burden*.

Figure 1 The Academic Infrastructure

- Programme specifications – these include concise descriptions of the intended learning outcomes from a higher education programme, and how these outcomes can be achieved and demonstrated
- Qualifications frameworks (one for England, Wales and Northern Ireland and one for Scotland) – these describe the generic levels of achievement represented by particular higher education qualifications
- Subject benchmark statements – these set out expectations for standards of degrees in a range of subject areas. They describe what gives a discipline its coherence and identity, and define what can be expected of a graduate in terms of the abilities and skills needed to develop understanding or competence in the subject
- ‘Code of practice for the assurance of academic quality and standards in higher education’ – this provides guidance on maintaining quality and standards for universities and colleges subscribing to QAA (see www.qaa.ac.uk/academicinfrastructure/codeofpractice/).

Source: http://www.hefce.ac.uk/pubs/hefce/2009/09_40/09_40.pdf

the QAA's code of practice to make it more user-friendly and less prescriptive. This report also led to the establishment of the Better Regulation Review Group, a predecessor to the Higher Education Regulation Review Group (HERRG).

Since 2004, further work on reducing the burden of accountability in HE has been taken forward by the HERRG, which concluded its work in 2008.¹⁵ The HERRG identified three key principles of better regulation for the sector: better processes that reduce the cost of reporting and inspection; the need for funding bodies to move towards a risk-based approach to regulation; and for institutions themselves to guard against ‘gold-plating’ in their own processes. The Higher Education Concordat on Quality Assurance Arrangements and Data Collection was launched by HERRG in May 2006. This called for a more co-ordinated approach to external QA and has many of the major funding and regulatory bodies as signatories. The HEFCE and QAA annexes to the concordat highlighted the work of the QAFRG in identifying further improvements to be made to the QAF in line with a climate of more proportionate, risk-based regulation.

EMPLOYER ENGAGEMENT AND COLLABORATIVE HIGHER EDUCATION

In recent years, there has been a concerted drive towards greater employer engagement in HE. In 2003, HM Treasury's Lambert Review argued for better-developed innovation and interaction between businesses and universities, and the 2004 Leitch Review concluded that the HE sector should become more responsive to the needs of employers through increased engagement¹⁶. The Government response to the Leitch Review¹⁷ set a challenging target for 36% of adults to be qualified to level 4 and above by 2014, alongside the longer-term ambition for over 40% to be qualified to this level by 2020.

It is important to state at this point, that employer engagement in its broadest sense is a long-standing area of work for many HEIs. As we discussed in our work for HEFCE and the QAA on employer engagement and QA¹⁸, it can cover a diverse range of activities, some of which are very well-established within institutions (see Figure 2 right).

[15] HERRG's work is to be taken forward by a successor body, the Better Regulation Group.

[16] Lambert, R (December 2003), *Lambert Review of Business-University Collaboration: Final Report and Leitch, S (December 2006), Prosperity for all in the global economy – world class skills.*

[17] DIUS (July 2007), *World class skills: implementing the Leitch Review of Skills in England.*

[18] SQW Consulting (August 2008), *Quality assurance and employer engagement in HE learning – available at: http://www.hefce.ac.uk/pubs/rdreports/2008/rd13_08/rd13_08sqw.pdf.*

Figure 2 Some types of employer engagement in higher education

- Employer input into the design/content of curricula via Industry Panels or equivalent (this is a key component in the development of Foundation degrees but can also be found in a wide range of other programmes at both undergraduate and postgraduate/continuing professional development levels)
- Practising professionals teaching on HE programmes in relevant professional areas (and in some cases, formally employed as part-time lecturers)
- Provision of work placements (both as formally assessed components of a programme or as more informal opportunities)
- Employer involvement in careers education, information and guidance, including input in helping to define/develop graduate employability skills and attributes more broadly
- Guest lectures
- Employer or professional, statutory and regulatory bodies (PSRB) involvement in assessment of professional competence/licence to practise
- Provision of bespoke or tailored programmes/courses for particular employers/sectors (which may sometimes involve SSCs acting as brokers)
- Accreditation of prior (experiential) learning (AP(E)L)
- Work-based and workplace learning, including recognition of in-house company programmes.

Source: SQW Consulting (August 2008), *Quality assurance and employer engagement in HE learning*

Such activities are also part of the broader context of collaborative relationships and partnerships which many institutions have developed, either to extend provision of their learning and teaching or to enhance their research, knowledge transfer and wider civic, cultural and community engagement. The scale and scope of collaborative relationships vary considerably across the HE sector and the extent of engagement will often be linked to the particular mission and strategic priorities of an individual institution. Over the last few years, the development of Foundation degrees (Fds), the establishment of Lifelong Learning Networks (LLNs) and the promotion of employer engagement activities have added impetus to the importance of working collaboratively. Some universities have built up extensive networks with FEC partners. Collaborative partnerships also exist with other HEIs, professional, statutory and regulatory bodies (PSRBs), employers, Sector Skills Councils (SSCs) and private providers. Some partnerships are local and regional; other work may be national or international in scope.

It is recognised, however, that much of the current policy focus is on the active involvement of employers in developing HE provision which is directly relevant and responsive to their needs. This may be provided as 'bite-sized' learning opportunities, often delivered in the workplace and sometimes involving accreditation of employers' existing in-house training and development. HEFCE has supported a number of innovative projects and pilots via its Strategic Development Fund (SDF), including the three regionally-based Higher Level Skills Pathfinders (North West, South West and North East) and 35 institutional projects. Additional student numbers have been attached to the pilots, along with a requirement that employers should co-fund activities.

Another Select Committee report, *Re-skilling for recovery: After Leitch, implementing skills and training policies*¹⁹ highlighted the important roles for both HEIs and FECs in the employer engagement

[19] *Innovation, Universities, Science and Skills Select Committee (December 2008), Re-skilling for recovery: After Leitch, implementing skills and training policies.*

“This may be provided as ‘bite-sized’ learning opportunities, often delivered in the workplace and sometimes involving accreditation of employers’ existing in-house training and development.”

agenda. It noted, however, that collaborative working between HE and FE is not always as constructive and effective as it might be. The current funding environment for HE with its constraints on further growth is not particularly conducive to extending this type of partnership activity and may lead to further tensions in collaborative relationships.

This report also recommended that the economic recession may require a different approach, with increased emphasis on the needs of re-skilling as well as up-skilling. The Government decision to remove public funding from most people studying for equivalent or lower HE qualifications (ELQs) makes it even more challenging for institutions to respond to this agenda.

RISKS IN COLLABORATIVE ARRANGEMENTS

Collaborative provision is an area which is often perceived to be inherently more risky than traditional programmes designed, delivered and assessed by one degree-awarding institution. As highlighted above, under the current QAF HEIs with large and complex collaborative provision have been subject to a supplementary process of collaborative provision audit (CPA) in addition to their main institutional audit. In many professional disciplines, institutions are also required to undergo other external QA, accreditation or inspection processes, particularly in areas which require a licence to practise.

Figure 3 Types of risk associated with collaborative provision of higher education

- **Reputational and quality risks:** the need to ensure that the quality of an award and the associated student experience is maintained (putting in place appropriate checks and balances), which leads to a consistent approach across partner organisations. An institution’s brand and the credibility of the award is at risk
- **Financial risk:** the costs of setting up and maintaining the collaborative arrangements and ensuring that any financial risks are proportionate and well-managed
- **Spatial risk:** the activity is one step further away from the lead institution so there can be concerns about how truly familiar the partner organisation is with the processes of the HEI. Distance can also make it more difficult to build relationships on a more informal, ongoing and truly collaborative basis
- **Cultural risk:** the risk can potentially increase when HEIs collaborate with different types of organisations, and particularly with non-educational partners. Greater resources may also be needed to support such partners (to assist their understanding of the HE environment and to provide appropriate learning resources and other facilities).

Source: SQW (2008) *Assessing the impact of reviews of collaborative arrangements on higher education institutions*

“Working with non-educational partners, in particular, involves a major investment of time to ensure that such organisations fully understand the importance of maintaining a high quality and consistent HE learner experience.”

As part of our work on collaborative relationships in HE,²⁰ HEIs identified some major risks which they felt had a significant impact on the development of collaborative HE provision (see Figure 3, page 8).

HEIs are becoming increasingly strategic about the types of collaborative partnerships in which they are engaging, reflecting current funding constraints and the perception that there may be higher reputational and quality risks associated with such provision. Working with non-educational partners, in particular, involves a major investment of time to ensure that such organisations fully understand the importance of maintaining a high quality and consistent HE learner experience.

The increased policy emphasis on employer engagement is also making an impact on the nature of the risks associated with collaborative provision. Issues identified in this context have included:

- the challenges of engaging small and medium-sized enterprises (SMEs)
- a lack of clarity about what demand-led HE and co-funding arrangements actually mean in practice
- the extent to which the current HE funding and QA approaches are appropriate for supporting and facilitating more flexible, bite-sized learning opportunities in the workplace.

Partner organisations have their own perceptions of risk which are primarily financial and strategic. They see themselves as vulnerable to possible changes in an HEI’s priorities or strategic objectives which could result in a loss of funding and/or student numbers. To mitigate this, many FE partners, in particular, have made a conscious decision to work with more than one HEI, although this brings the increased demands of working with different sets of processes and arrangements.

A challenging area in the development of more employer-responsive provision is the role played by employers in assessment and in providing workplace mentors or supervisors. It is essential that mentors and supervisors understand their role in formative assessment and in ensuring that higher-level learning is taking place. While direct employer involvement in summative assessment remains relatively limited at present, again, it is important for employers to understand the need to assess HE learning, rather than job-based competency.

GOOD PRACTICE AND EFFECTIVE STRATEGIES

Our work has identified examples of good practice which have helped HEIs and their partners to assure the quality of their collaborative programmes. Some of these are provided in Table 1, page 10.

[20] Available at: http://www.hefce.ac.uk/pubs/rereports/2008/rd11_08/.

Table 1 Good practice in collaborative provision

THEME	GOOD PRACTICE EXAMPLES
Relationship building	<ul style="list-style-type: none"> • Partners develop the annual monitoring report in conjunction with the HEI which gives a greater sense of ownership and responsibility to partners, as well as making them reflect on the provision. It also ensures that the process is analysed using a common template created by the lead institution • HEI away days involve all of the partners engaged in collaborative provision and act as a real opportunity for sharing good practice with each other • Effective linkages between HEI and partners, for example an FEC HE manager sits on the Faculty board of the HEI • The use of link tutors between the HEI and partner (and in some cases designated links at both a subject and wider institutional level) • A student virtual learning environment (VLE) which gives learners and teachers at the partner organisation a sense of closer links to the HEI
Quality assurance	<ul style="list-style-type: none"> • Templates for memoranda of agreement between HEIs and partners • Inter-linkage and inter-operability of systems, processes and procedures between HEIs and partner organisations (primarily with FECs) to ensure transparency and consistency • Internal HEI forum that brings together university assessors who look at each collaborative link. This has led to a significant improvement in the consistency of quality and message • Some institutions have carried out 'dummy' or 'mini-audits' with partners in advance of a real review to understand the information, paperwork and meeting requirements and impact • Using the audits to review and refresh practices, and to develop internal processes to manage collaborative provision institution-wide • The use of periodic internal audits as a way of ensuring academic and quality standards for collaborative provision are working well and allowing for internal dissemination of good practice
Training and staff development activities	<ul style="list-style-type: none"> • Holding an annual teaching and learning conference for partners to disseminate good practice on collaborative activities • Workshops for internal (HEI) leaders to share good practice relating to collaborative provision • Regular meetings focusing on administrative issues and development activities • Review days between the HEI and partners to update them on processes, procedures and systems; focusing on both awareness raising of new policies and processes and reiterating how things should be done • Working and supporting partners in preparation for, and engagement with, the audit process; in particular, offering briefing events, mock interviews and the opportunity for partners to be active participants in operational steering groups and to comment on audit documents

Source: SQW (2008) *Assessing the impact of reviews of collaborative arrangements on higher education institutions*

Figure 4 Employer engagement: Some QA challenges and effective strategies**QA challenges:**

- ensuring comparability of delivery and access to learning opportunities across different sites
- ensuring robust, but proportionate, assessment processes are in place, especially for work-based learning
- the sustainability of employer-responsive provision (including the danger of fluctuation of demand within particular sectors and from individual employers)
- the influence of professional regulation which might constrain innovation in some areas
- ensuring that employers understand the role and purpose of academic QA, while not overburdening them with the detail
- the need for flexibility and tighter timescales for developing and quality assuring new provision.

Effective strategies adopted by HEIs:

- taking a strategic approach to employer engagement and ensuring it fits with the institutional direction and is embedded across the institution
- ensuring consistency of approach by developing a university-wide regulatory framework for negotiated learning
- finding ways to adapt regulatory frameworks to facilitate the accreditation of small amounts of learning, including reviewing systems to enable rapid validation of short courses and developing QA for stand-alone accredited modules, without compromising standards
- linking individual modules to larger programmes of study to encourage students to continue studying
- staff training to ensure that QA challenges and appropriate approaches are understood
- ensuring provision is aligned with internal QA processes and the QAA Code of Practice.

Source: SQW Consulting (August 2008), *Quality assurance and employer engagement in HE learning*

Our study on the role of QA in employer engagement activities highlighted some of the QA (and other) challenges in developing this type of provision. Many of these were not felt to be fundamentally different to the challenges involved in developing other types of collaborative programmes – or HE provision more generally. In Figure 4 (page 11), we highlight some of the challenges identified by HEIs and the strategies which they had put in place to address these issues.

As part of our work, we developed a multi-level approach to identifying possible QA questions which institutions may wish to ask themselves and to discuss with employers. Individual HEIs and

partners may find it useful as a prompt or checklist which can be further developed and tailored to suit their particular circumstances. An extract from this approach is presented in Table 2 and a fuller version can be found at: http://www.hefce.ac.uk/pubs/rdreports/2008/rd13_08/rd13_08sqw.pdf. The table identifies some key characteristics of HE provision, the parameters within which these may operate and possible QA challenges and questions for further consideration. We also include some indicative examples of good practice from our fieldwork with institutions. The full version of the approach also covers some additional characteristics: location of study; credit rating, partnership and sustainability.

Table 2: A multi-level approach to the quality assurance of employer engagement provision

Characteristics of HE learning	Parameters	Quality assurance issues relating to employer engagement	Some indicative examples of good practice
Content	<p>Set by HEI</p> <p>Partially negotiated</p> <p>Fully negotiated</p> <p>Prescribed by employer or PSRB</p>	<p>Is the content at HE level?</p> <p>Is the provision compatible with the use of a wider credit framework?</p> <p>Does it fit within any institutional framework of generic awards or module catalogue?</p> <p>Have we specified individual learning outcomes and how these relate to other provision?</p> <p>How do we ensure the comparability of the student experience (access to learning opportunities)?</p>	<p>HEIs work with employers to ensure that provision is at HE level and is not solely competency-based.</p> <p>Provision is clearly situated within an institution-wide framework for negotiated learning.</p> <p>Individual learning outcomes are clearly specified and compare with other provision at the same level.</p> <p>Workplace learners have access to a comparable range of learning resources to those provided for on-campus students.</p>
Competence in the workplace	<p>Assessment of competence/licence to practise is a separate, parallel process</p> <p>Some incorporation/recognition of specific competences / professional standards via award of HE credit</p> <p>HE programme fully incorporates professional standards/licence to practise</p>	<p>Do all parties understand the boundaries between HE academic content and the assessment of competence/licence to practise?</p> <p>If providing credit for competence, have we ensured that this is related to the HE level learning associated with the competence?</p>	<p>Training is provided for workplace assessors with little experience of HE.</p> <p>The HEI sets out clear areas for assessment.</p> <p>AP(E)L procedures are based on established guidelines.</p>
Level of study	<p>Non-credit-bearing</p> <p>Credit-bearing</p> <p>Undergraduate (including Fds)</p> <p>Postgraduate</p> <p>Continuing professional development</p>	<p>Does non-credit-bearing provision call for different or streamlined internal QA processes?</p> <p>Have we ensured that employer-responsive provision is mapped onto the Framework for HE Qualifications (FHEQ)?</p>	<p>Robust but proportionate QA processes, based on the QAA Code of Practice, are used for all provision (whether credit-bearing or not).</p> <p>Credit-bearing provision is mapped on to the FHEQ.</p>

Characteristics of HE learning	Parameters	Quality assurance issues relating to employer engagement	Some indicative examples of good practice
Size	Bite-sized Module(s) Part/interim qualification Full qualification	What is an appropriate / acceptable minimum 'size' of learning package? Should we maintain a bank of modules or develop everything on a more bespoke basis? What is the role of shell modules and AP(E)L? What are the cost issues for QA small elements of provision?	Shell modules are developed so that context-specific content can be accredited rapidly. The development of shell modules also helps maintain sustainability of provision by widening the potential market. Institutional frameworks have been adapted to facilitate the credit-rating of small amounts of learning.
Teaching	By HE staff By a mix of HE and employer staff (or private training provider working for employer) By employer staff (or private training provider working for employer)	Have we provided effective staff development for HE and workplace/training provider staff involved in the provision? Does employer engagement feature in any initial development for new lecturing staff? How do we provide developmental support for staff with varying levels of experience/expertise in this area?	Effective staff development is provided (both for HE and employer staff) at a range of appropriate levels. Staff learn about good and emerging innovative practice from expert networks. HE and employer staff meet regularly to share practice and learn from others.
Assessment	By HEI staff only By HEI staff and work-based assessors Recognition of prior assessment in the workplace through AP(E)L by HEI	Have we provided effective staff development? Do HE staff understand the work environment? Do work-based assessors understand how to assess at HE level (formative and summative) and provide feedback to learners? Do work-based assessors hold suitable qualifications?	The qualifications and experience of workplace assessors are considered individually and bespoke support/training provided where necessary. HE staff are provided with developmental opportunities related to work-based/workplace learning and AP(E)L.
Progression	Full progression opportunities Partial progression opportunities Limited progression opportunities	Do we design our programmes to enable credit accumulation towards named or generic awards? What role might shell modules play? Will these credits be recognized by other HEIs locally, regionally, nationally?	All provision is credit-rated so that learners can accumulate credit towards an award (perhaps with a number of employers). Linking individual modules to larger programmes of study to encourage learners to continue studying. HEIs work via collaborative networks such as LLNs to ensure a common approach to credit.

CRITICAL SUCCESS FACTORS

A number of critical success factors for employer-responsive HE have also emerged from our work, as briefly summarised below:

- the importance of understanding market areas in depth
- identifying markets/sectors which are sustainable and can support development costs
- ensuring that provision is based on good training needs assessment
- provision is genuinely demand-led
- attracting learners and employers with 'bite-sized' modules, while also providing clear progression pathways to full qualifications
- providers have developed internal processes of course validation to facilitate greater flexibility and adaptability (including the use of shell modules where content is expressed in terms of core elements and skills and can be subsequently tailored to address particular sector or employer requirements)
- making use of skilled/expert intermediaries working at the HE-business interface
- setting realistic expectations and delivering to these.

WHERE NEXT FOR QUALITY ASSURANCE IN HIGHER EDUCATION?

The coming year will see further significant consultation and discussion about a successor system to the current QAF. There are some important issues for any new system to address if the sector is to meet the Leitch targets and significantly increase its provision of more innovative and employer-led HE.

Institutions need to feel confident in developing their own more responsive internal QA policies and procedures for new types of programmes, within the

context of an enabling sector QA framework which focuses more on outcomes and less on processes.

External review should ensure that all provision, however delivered, is at an appropriate HE level and offers a high-quality experience to learners. Communicating this effectively to the wider public will be increasingly important if the sector is to maintain its current national and international reputation.

At the same time, it will be important not to lose sight of the better accountability agenda with its focus on proportionate regulation, based on an assessment of relative risk. The sector does not want, or deserve, a return to the more burdensome processes and 'quality wars' of the past. Whether there is a consensus about what a more risk-based approach to QA might actually mean is more debatable. It could mean a system more driven by self-assessment, with less frequent but more substantial external review. It could incorporate more multi-agency reviews, with relevant bodies working together to share information and reach common judgments.

The notion of a continuum of risk needs to be developed. Risks should be assessed on an individual partnership basis rather than assuming that certain types of collaborative arrangements may be inherently more or less risky. A more sophisticated typology of collaborative arrangements is required, taking into account both the type of collaboration (FE, PSRB, SSC, employer, private provider etc.) and the type of engagement (validation, curricula development, accreditation of employer training etc.).

A risk-based approach may also bring some potential pitfalls. Who defines and quantifies risk in such a system? Such an approach might also lead to HEs becoming more risk averse and withdrawing from innovative, collaborative arrangements at a time when other HE policy drivers are encouraging new ways of working. Preventing such behaviour, and also learning from thriving collaborative provision and effective employer engagement, must be priorities for the development of a more responsive and flexible HE QA system for the future.

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