

# External quality review

March 2022



## Introduction

1. This document provides the details of the external quality review which regulated institutions are required to undergo under the [Quality Assessment Framework for Wales](#).
2. The Home Office has confirmed that the quality review arrangements meet their requirements for educational oversight for Student Sponsor arrangements, and we will liaise with them to ensure that any revised arrangements continue to do so.
3. The introduction of the Commission for Tertiary Education and Research (CTER) may mean that the external quality review requirements need to be updated prior to the end of the next cycle.

## External quality review

4. The requirement for external quality reviews takes account of HEFCW's statutory responsibilities in relation to education provided by and/or on behalf of regulated institutions, including that which is inadequate, or which is likely to become inadequate. It provides the assurance required under the Higher Education (Wales) Act 2015 with regards to quality to enable Fee and Access Plans to be approved, and therefore for regulated institutions to access student support.
5. The external quality review must comply with the [European Standards and Guidelines](#) (ESG) requirements for such reviews. The ESG enable higher education providers to demonstrate quality and increase transparency, helping to build mutual trust and better recognition of their qualifications, programmes and other provision. The ESG are used by institutions and quality assurance agencies as a reference document for internal and external quality assurance systems in higher education.
6. We will retain a rolling cycle of reviews, which means that changes may be introduced at any time (with institutions having at least 12 months' notice in advance of their reviews). This will enable the method to be updated when appropriate, rather than waiting for the end of a cycle. This is important in the context of CTER, which may give rise to changes to review requirements, and given the increasing diversity of higher education provision.

### Review body

7. Given the undertaking of the external review to comply with the ESG, it is essential for the body undertaking the reviews to be on the [European Quality Assurance Register for Higher Education \(EQAR\)](#). HEFCW will commission reviews from the Quality Assurance Agency for Higher Education (QAA). HEFCW will confirm the timing of reviews with each institution as soon as possible, together with confirmation of the fallow year.

### Membership of review team

8. In accordance with the ESG requirements for external quality reviews, the review team must be comprised of peer experts. The team must include a student member. The review team may also include an international member, particularly where an institution identifies that it is world-leading in specific areas of study or activity.
9. Reviews may be carried out bilingually, in accordance with the preference of the provider, and the QAA will need to be able to take account of this in appointing a review team. At least one reviewer will need to have an understanding of Welsh higher education and the role of the Welsh language. The review team will also be given training on Welsh language considerations.

### Provision covered

10. The external quality review must cover all HE provision delivered by or on behalf of the institution, including degree apprenticeships, sub-contractual (franchise) provision, branch campuses and any other overseas provision. However, where partner, delivery or support organisations are also required to undergo external quality review, it would be appropriate to limit the review of the awarding organisation to its management of that arrangement, in order not to duplicate review activity.
11. This will not preclude HEFCW from commissioning thematic and/or risk-based reviews, or concerns investigations.

### Relevant baseline requirements

12. The relevant baseline requirements against which regulated institutions will be reviewed include the following:
  - that the academic standards of courses meet the requirements of the relevant national qualifications framework, which, in Wales, is both the Framework for Higher Education Qualifications (England, Wales and Northern Ireland) and the Credit and Qualifications Framework for Wales;
  - the Expectations of the UK Quality Code for Higher Education, in relation to both English and Welsh medium provision of the institution, together with characteristics statements and subject benchmark statements, where appropriate;
  - the Core and Common Practices of the UK Quality Code for Higher Education<sup>1</sup>, in relation to both English and Welsh medium provision of the institution.

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<sup>1</sup> Note that the Quality Code enables the appropriate testing of the baseline regulatory requirements as they apply to quality and standards regarding the work of the Office of the Independent Adjudicator (the core practice states: the provider has fair and transparent procedures for handling complaints and appeals which are accessible to all students).

## Enhancement

13. Enhancement is a key focus of the external quality review in Wales. The QAA will consider with the sector and other stakeholders how the focus on enhancement can be strengthened within reviews, to achieve a better balance between enhancement and assurance. We expect the QAA to consider how to ensure that institutions reviewed in the earlier part of the cycle are not disadvantaged compared to those later in the cycle, in terms of enhancement activity.
14. Outcomes of the review will include a statement on the institution's strategic approach to enhancement of the student academic experience. This will include how the institution takes account of feedback and recommendations from the student body. There will not be an explicit judgement on enhancement, but HEFCW will keep this under review in consultation with providers.
15. HEFCW will fund some enhancement activity on an annual basis. In addition, HEFCW will provide funding for some additional enhancement activity in the fallow year between reviews. Some of this activity will take place in partnership with Scotland and Northern Ireland. Given the nature of enhancement, the form this will take is likely to change over a review cycle.
16. We expect the QAA to:
  - work with providers, reviewers, students, and other stakeholders to determine how the enhancement element of the review can be strengthened, recognising that this may change over the review cycle;
  - work with providers to determine the most appropriate nature and form of enhancement activity throughout the review cycle;
  - consider how to accommodate the potential for providers reviewed at the start of the cycle to be in a different position to those reviewed towards the end of the cycle, in order to provide parity;
  - consider in more detail how joint quality activity across Wales, Scotland and Northern Ireland might be achieved, particularly during the fallow year, and including participation from providers in England where this would add value;
  - include in the methodology a requirement for reviewers to identify opportunities regarding enhancement;
  - ensure that review reports include a statement on the institution's strategic approach to enhancement of the student academic experience;
  - engage with providers throughout the review cycle to share case studies and examples of good practice in relation to enhancement.

## Engagement with students

17. The review team must meet the Students' Union and/or representatives of the diverse student body<sup>2</sup>. In line with the approach of reducing burden, the review

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<sup>2</sup> Part-time, full-time, international, European, UK, postgraduate, undergraduate, mature and non-traditional students, students of franchise HE in FE, distance learners, and students who choose to engage in HE through the medium of Welsh

should focus on documentation which is produced as part of the Students' Union's own processes, for example by providing the annual quality reports with a short summary reflecting on the period since the last review. In any case, where the Students' Union produces annual quality reports on behalf of the student body, then these should normally be considered by the team as part of the evidence for the review, together with any other evidence that the student body might wish to submit.

18. The institution must support the participation of the Students' Union and representatives in the review, and provide training, advice, guidance and access to information/ resources as appropriate.
19. Students' Unions may submit documentation in partnership with their institution, but will need to recognise that the shift to existing or more live documentation may present some challenges.
20. We expect the QAA to:
  - work with Students' Unions to determine to minimise burden in producing student submissions, eg by focussing on use of annual quality reports, where they are produced.

### Judgements

21. In order to facilitate comparison of outcomes, the external review should have a set of common judgements.
22. The following judgement terminology will be used for the external quality review in Wales:
  - a) Meets requirements
  - b) Meets requirements with conditions – the institution will need to implement an action plan to address areas of immediate concern<sup>3</sup>
  - c) Does not meet requirements.
23. The external quality review will evaluate whether the regulated institution's internal quality approaches comply with European Standards and Guidelines. It will also evaluate whether institutions meet the baseline requirements for the [Quality Assessment Framework](#) for Wales.
24. The judgements will be made regarding whether or not the institution meets:
  - the requirements of the European Standards and Guidelines for internal quality assurance;
  - the relevant requirements of the baseline standards for the Quality Assessment Framework in Wales.
25. Information on how we deal with outcomes of 'meets requirements with conditions' or 'does not meet requirements' is described in our [Procedures for assessing the quality of education](#). Any outcomes which are not satisfactorily dealt with via those procedures will be subject to the processes detailed in our [Statement of Intervention](#).

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<sup>3</sup> The conditions attached to this judgement will need to clarify the issues involved.

26. Should there be any judgements of 'meets requirements with conditions', or 'does not meet requirements', institutions will need to implement an action plan to enable the judgement to be revised within 12 months of the publication of the review outcome. They will need to obtain verification from the QAA that actions taken in response to the review outcomes have rectified any deficiencies within that timescale, and therefore enable the judgement outcome to be upgraded.
27. Upgrading the review judgement is essential, as the external review judgement will inform HEFCW's assessment regarding whether institutions meet the quality requirements of the Fee and Access Plan. Any amendment to the judgement following satisfactory action planning will also need to be published.

#### Commendations

28. Aspects of excellent or best practice in relation to all areas of the review are eligible for commendations. These will be statements, rather than judgements.

#### Publication of reports

29. The report will need to be published, as noted in the ESG. The report should also include recommendations, in line with ESG requirements.

#### Outcomes of reviews or inspections by other bodies

30. Evidence for the review should include the outcomes of other reviews. These include reviews by Professional, Statutory and Regulatory Bodies (PSRBs), which may accredit specific courses and may also review/ inspect provision at regulated institutions. In addition, Her Majesty's Inspectorate for Education and Training in Wales (Estyn) have statutory responsibility for inspecting Initial Teacher Training provision, FE in HE, and further education institutions which may also be offering higher education provision.
31. Other reviews also include the outcomes of QAA reviews of validated partners. Outcomes of 'meets with conditions' or 'does not meet' (or equivalent judgements, where other review methods are used) will be considered to reflect on the validating partner. This may trigger a concerns investigation, or may be followed up in the next review of the validating partner, should this be within a reasonable timescale.
32. The Quality Assessment Framework includes information about how the outcomes of other reviews may trigger our inadequate quality procedures.

#### Documentation

33. We do not intend to be prescriptive about the documentation used for the review. However, in order to minimise duplication, reduce administrative burden and to enable the review to focus primarily on institutions' oversight of

quality, the review should focus on documentation which is produced as part of the institution's own quality processes.

34. There may be a number of ways in which the burden of documentation could be reduced. Options could include replacing the self-evaluation document with documentation such as institutions' annual quality reports to the governing body, with a short summary reflecting on the period since the last review. A live change register could be used in place of the Change Report.
35. Institutions will continue to be able to provide documentation to the review team bilingually, in accordance with their preference. The shift to the use of live or existing documentation may facilitate greater engagement in reviews through the medium of Welsh.
36. We expect the QAA to:
  - work with institutions to determine how live or existing documentation can be used within reviews, rather than producing documentation specifically for this purpose, and recognising that a single approach would not suit all providers;
  - work with providers to ensure that this approach provides consistency in terms of the information required, while avoiding duplication;
  - work with providers to determine how best to re-confirm, as opposed to re-test, the baseline requirements, in making the assurance judgements within the review.

#### Data

37. There will be an increased use of data within reviews, to ensure that outcomes are based on evidence. This will include the data noted within the Quality Assessment Framework (ie over/under-recruitment patterns; non-progression rates; non-completion rates; National Student Survey outcomes; degree outcomes, including differential outcomes for students with different characteristics; employment outcomes). HEFCW will provide this data to the QAA under its data sharing agreement.
38. Data should cover all levels and modes of provision, including HE in FE, and will be need to assessed qualitatively, with the use of contextual information, as well as quantitatively. This will help to take account of factors such as the pandemic, which are likely to impact on data for a number of years. The focus should be on on contextual information, trends and performance against benchmarks where possible, and/or outcomes for providers across the UK.

#### Intelligence

39. HEFCW will share intelligence with the QAA and the review team in order to enable reviews to provide us with assurance on issues identified through HEFCW processes. This will include sharing:
  - outcomes of relevant aspects of our institutional Risk Review process;
  - triennial quality assurance visit reports;
  - annual assurance statements relating to quality;

- Quality Assessment Committee (QAC) institution-specific recommendations, from consideration of data and intelligence;
  - HEFCW's analysis of Higher Education Statistics Agency (HESA) data, National Student Survey (NSS) data, and related data;
  - information on complaints or allegations received by HEFCW.
40. We will also share intelligence on institutional developments, and other contextual information.

#### Frequency of reviews

41. Reviews should normally be carried out at least every five years. There will be a fallow year as part of the cycle, to enable more concentrated enhancement activity to take place.
42. In addition:
- Where an institution receives any judgement of 'meets requirements with conditions' it should undergo a further review within four years of the previous review, even if the judgement has been revised;
  - Where an institution receives any judgement of 'does not meet' it should be reviewed within two years of the previous review, even if the judgement has been revised;
  - Where an institution has undergone substantial structural change, eg through merger with another one, or becoming part of a group structure, then a new review of the whole institution should normally be carried out at the earliest date at when any of the constituent partners were due a review.
43. HEFCW will operate a risk-based approach regarding whether any other significant changes to provision should require an earlier full or partial review. This will include consideration of:
- the outcomes of HEFCW's annual Institutional Risk Review process;
  - the governing body annual assurance statements regarding quality;
  - Fee and Access Plans;
  - concerns raised regarding standards and quality; and
  - HEFCW's other engagements with institutions.
- These will be considered in the context of the institution's own quality processes.
44. HEFCW will inform the institution whether it needs to undergo a further review in order to meet the quality requirements of Fee and Access plans. This will also provide the institution with the opportunity to submit evidence where it does not believe it should undergo such a review.
45. Depending on the issue(s) triggering the decision, the earlier review could be a full review, or a review of a specific aspect(s) of the institution's provision. Changes that could trigger a decision include, for example, significant changes to student numbers, types of provision, collaborative provision, etc.



46. In addition, as set out with [HEFCW's Procedures for Complaints against Institutions](#), a preliminary investigation by HEFCW may be used to determine whether a full investigation is required. The outcomes of any such investigation may also result in an earlier full review of the institution, or a partial review of a specific aspect(s) of the institution's provision.

### Summary

47. The key features of the review are summarised below.

<b>Feature</b>	<b>Description</b>
Reviewing organisation	QAA
Membership of review team	Peer experts, including (a) student member(s) and an international member where an institution identifies that it is world-leading in specific areas of study or activity
Review coverage	All HE provision delivered by or on behalf of the institution, including degree apprenticeships, franchise provision, branch campuses and other overseas provision, with a focus on both assurance and enhancement.
Baseline requirements	<ul style="list-style-type: none"> <li>• The FHEQ and CQFW</li> <li>• The expectations of the quality code</li> <li>• The core and common practices of the quality code</li> </ul>
Enhancement	The review will include a statement on the institution's strategic approach to enhancement of the student academic experience. Enhancement will be a key focus of the review.
Engagement with students	The review must take account of the views of current students, and meet with them as part of the review. The institution must provide training, advice and guidance and access to information/resources as appropriate, to support the Students' Union and representatives in their participation.
Judgements	Terminology: <ul style="list-style-type: none"> <li>• Meets requirements;</li> <li>• Meets requirements with conditions;</li> <li>• Does not meet requirements.</li> </ul> Judgements regarding whether or not the institution meets: <ul style="list-style-type: none"> <li>• the requirements of the European Standards and Guidelines for internal quality assurance</li> <li>• relevant requirements of the baseline standards for the Quality Assessment Framework in Wales.</li> </ul>
Revision of judgement	A judgement other than 'meets requirements' can be amended once the institution has addressed

	the issue(s) leading to the unsatisfactory judgement within 12 months.
Commendations	Commendations will highlight examples of excellent or best practice.
Review report	Must be published, and must include any recommendations.
Outcomes of reviews or inspections by other bodies	Regulated institutions must keep HEFCW informed of any unfavourable outcomes from PSRB review/ inspection. In the case of serious institutional implications, HEFCW may initiate the Procedures for assessing the quality of education, and/or implement the Statement of Intervention. Unfavourable review outcomes for validated partners may trigger a concerns investigation, or be followed up in the next review of the validating partner.
Documentation	The review will focus as much as possible on documentation which is produced as part of the institution's and students' union's own processes
Sharing data and intelligence	HEFCW will share data and intelligence with the QAA and review team in advance of reviews
Frequency of reviews	At least every five years.

## Related matters

48. **Annex A** sets out processes and factors that contribute to the review method.

### Annual assurance statements

49. Institutions are required to submit annual assurance statements relating to quality. HEFCW will share a copy of these with the QAA as part of the review documentation.

### Triennial visits

50. HEFCW's triennial visit to regulated institutions incorporate quality. The visits align with the timetable for Council visits to providers, and are designed to seek further information regarding how the governing body is enabled to complete the annual assurance statements relating to quality. If appropriate, HEFCW will share the triennial visit reports with the QAA prior to the external quality review.
51. The visits include engagement with the governing body, senior management, and the Students' Union, which should incorporate representation of the diverse student body. The visit may include queries resulting from the external quality review, Fee and Access Plans, and other institutional engagements.

### Fee and Access Plans

52. Any institution wishing to remain regulated must have undertaken an external quality review of their higher education provision (or equivalent Higher Education Review: Wales or other appropriate QAA process) in the past six years. The outcomes of other reviews/ inspections will not suffice. Regulated institutions will need to provide HEFCW with the link to the published report as part of their Fee and Access Plan applications. Institutions seeking to become regulated must undergo a [Gateway Quality Review: Wales](#).
53. Institutions that are already regulated will be able to apply for a Fee and Access Plan while addressing the outcomes of any judgement(s) of 'meets requirements with conditions' or 'does not meet requirements'. They will need to include information on how they are addressing any unfavourable outcomes from the review. They will have twelve months to rectify the issue(s) and obtain a revised, published judgement from the organisation that carried out the external quality review. Should they fail to obtain a revised judgement in this timescale, then they will be deemed to have provision which is (likely to become) inadequate, and will therefore will not meet the quality requirements for regulated institutions.

### Teaching Excellence and student outcomes Framework

54. An outcome of 'meets requirements' in all categories of the external review will form the quality threshold for the TEF for Welsh institutions, should institutions wish to participate. Institutions which obtain judgements of 'meets requirements with conditions' or 'does not meet requirements' will meet the TEF quality threshold only when the judgements have been updated.

**Annex A: processes and factors that contribute to review**

