



Department
for Education

Designation of a body to perform the assessment functions for higher education in England

**Government consultation in accordance
with section 118 of the Higher Education
and Research Act 2017**

Launch date 19 October 2017

Respond by Midnight 22 December 2017

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Introduction

This consultation sets out the role of the Designated Quality Body and seeks the views of respondents on the suitability of QAA to fulfil that role.

Who this is for

- Sector bodies, mission groups and representative organisations;
- Providers of higher education;
- Students (prospective, current, former);
- Employers of graduates; and
- Taxpayers and citizens

Issue date

The consultation was issued on 19 October 2017.

Enquiries

If your enquiry is related to the policy content of the consultation you can contact the team on:

- 0114 274 2337 for the Higher Education Regulatory Policy Reform Team and ask for Chris Senior;

or email:

HERA.CONULTATIONS@education.gov.uk

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the DfE Ministerial and Public Communications Division by email: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the [DfE Contact us page](#).

Additional copies

Additional copies are available electronically and can be downloaded from [GOV.UK DfE consultations](#).

The response

The results of the consultation and the response will be published in spring 2018.

About this consultation

This consultation document sets out the role of the Designated Quality Body and the functions that it must carry out. It follows an invitation for expressions of interest in the role which closed on 19 September, and to which one body (QAA) provided a submission. That submission is attached to this document as an annex.

This consultation seeks your views on the suitability of QAA to fulfil the role of the Designated Quality Body.

Respond online

To help us analyse the responses please use the online system wherever possible. Visit www.education.gov.uk/consultations to submit your response.

Other ways to respond

If for exceptional reasons, you are unable to use the online system, for example because you use specialist accessibility software that is not compatible with the system, please contact us.

By email

- HERA.CONULTATIONS@education.gov.uk

By post

Catherine Gregory
Higher Education
Department for Education
Ground floor
Sanctuary Buildings
20 Great Smith Street
London
SW1P 3BT

Deadline

The consultation closes on 22 December 2017.

Background

The Higher Education and Research Act 2017 (HERA) establishes the Office for Students (OfS) as the new regulator for higher education in England. It enables the OfS to recommend to the Secretary of State a body to be designated to perform the effective assessment of the quality of, and the standards applied to, higher education providers in England. The body would also be required to provide advice to the OfS regarding the quality of, and the standards applied to, higher education when the OfS considers the granting, revocation or varying of degree awarding powers. In this document, these two functions are referred to together as “the assessment functions”. This body will be referred to in this document as the Designated Quality Body (DQB). Designation requires the body to perform certain functions specified in HERA. A body designated under HERA is able to charge appropriate fees to any registered higher education provider for performing those functions.

This consultation is the first step in the formal designation process and is being led by the Department for Education in accordance with section 118 of HERA. The consultation will provide evidence to assist the OfS to recommend a suitable body for designation after it is established. If the OfS considers that there is a body that is suitable for designation, the OfS must recommend it for designation to the Secretary of State, who has the power to designate the body under HERA.

The Higher Education and Research Act 2017

HERA received Royal Assent in April 2017. It contains a range of measures to increase competition and choice in the higher education sector in England. It also includes changes to raise standards and to strengthen the United Kingdom’s capabilities in research and innovation.

HERA establishes the OfS as a new student-focused market regulator for higher education in England. The OfS will operate on behalf of students and taxpayers. It will support a competitive environment promoting choice, quality and value for money. It will create a level playing field, streamlining regulation of all providers under one body and providing a clear set of conditions for each type of registered higher education provider.

The OfS will also operate the Teaching Excellence and Student Outcomes Framework, which recognises and rewards high quality teaching in order to drive up quality in the sector and improve student choice and graduate outcomes.

Designated Quality Body

HERA gives the Secretary of State powers to designate a quality body to perform the assessment functions under the Act.

Where the OfS decides that a higher education provider's initial or ongoing conditions of registration must include a condition relating to the quality of, or standards applied to, the higher education provided by the provider, the DQB will carry out the assessment of that provider's quality and standards. This assessment will be to inform the OfS's decision on whether or not those conditions are met. The DQB will also take on a new statutory responsibility to provide advice to the OfS on the granting, variation or revocation of degree awarding powers.

The designation process

Consultation

This consultation is the first stage in the formal designation process. It will provide evidence for the OfS to consider when making their recommendation to the Secretary of State on who to designate.

This consultation was preceded by an invitation for expressions of interest in the role, to which one body (QAA) provided a submission. That submission is attached to this document as an annex in order to allow you to comment on the suitability of QAA against the designation conditions.

You are free to name other bodies who have not expressed an interest, though any such body would also need to consent to being designated in order to be considered suitable.

The consultation will help the OfS to consider if there is a body which is suitable to be recommended for designation. In particular, by seeking the views of the sector, the consultation will enable the OfS to consider whether there is a body that commands the confidence of the sector, which is one of the conditions of suitability.

Recommendation (Spring 2018)

To be considered suitable for designation, an organisation must be able to meet all the designation conditions set out in HERA. Further detail explaining those conditions is set out below. The assessment will be based upon evidence from this consultation as well as any other relevant information. The OfS may request further information from QAA in order to assess suitability.

If the OfS considers that there is a body suitable for designation, it must recommend that body to the Secretary of State. If the OfS considers that there is more than one body that is suitable to be designated, it must recommend whichever one of those bodies it considers most appropriate. If no body is considered suitable for designation, the OfS may recommend that no body is designated. In these circumstances, the OfS would perform the assessment functions under HERA.

Designation

The OfS must notify the Secretary of State of its recommendation, including if it does not believe any body is suitable. The OfS is required to publish that notification. The Secretary of State will then make a decision on designation. If the Secretary of State considers that the recommended body is suitable, the body will be designated. If the

Secretary of State decides not to designate the recommended body, the Secretary of State must publish the reasons for not doing so. It is expected that the effective date (the date on which the designation takes place) will be agreed in discussion with the successful organisation.

Designation conditions

The designation conditions are set out in paragraph 4 of Schedule 4 of HERA. This section gives further detail of the conditions that the DQB must meet.

The DQB must meet the conditions set out below at the time it is designated. In responding to this consultation, you should do so on the basis of whether or not QAA is capable of meeting the conditions.

Details of the body's exact role and the approach it will take to the assessment functions is expected to be subject to agreement with the OfS, on the basis of general directions provided by the OfS.

1. Capability to assess the quality of, and the standards applied to, higher education

The body must be capable of performing the assessment functions set out in HERA. The DQB must also be prepared to provide the OfS with information, which is held by the Designated Body for the purposes of the performance of any of the assessment functions.

1.1 Assessment against initial registration requirements

Where the OfS decides that a higher education provider's initial conditions of registration must include a condition relating to the quality of, or standards applied to, the higher education provided by the provider, the DQB will be required to assess the quality of and standards applied to the applicant's higher education provision. This will then allow the OfS to determine whether the provider satisfies the initial conditions of registration.

1.2 Assessment against ongoing registration requirements

The DQB will be required to assess the quality of, and standards applied to, the higher education of registered providers to allow the OfS to determine whether the provider satisfies any ongoing registration condition relating to quality or standards. The manner in which this is to be carried out is not stipulated in HERA and it will be for the OfS to decide this, taking account of – and drawing from – the expertise provided by the DQB. We would expect the agreed approach to take account of the need for a proportional, risk-based approach that balances the burden on providers with the need to effectively identify and tackle problems where, or before, they arise.

1.3 Guidance for higher education providers

We would expect the DQB to be able to produce guidance on the approach agreed with the OfS to assess the quality of, or standards applied to, higher education for registered providers.

2. Advice to the OfS on degree awarding powers

Section 46 of HERA requires the OfS to request advice from the DQB when the OfS is considering granting, varying or revoking degree awarding powers.

The advice provided must include the body's view as to whether the provider has the ability to provide, and maintain the provision of, higher education of an appropriate quality, and to apply, and maintain the application of, appropriate standards to that higher education.

HERA sets out that this advice must be informed by a wide range of views. Specifically, the views of persons who (between them) have experience of the following areas, must be sought:

- (a) English higher education provision (including those with and without degree awarding powers),
- (b) English further education provision,
- (c) Student representation,
- (d) Employment of graduates,
- (e) Research into science, technology, humanities or new ideas, and
- (f) Encouraging competition in industry or another sector of society.

3. Sector-wide representation

HERA states that, as a condition of suitability for designation, the persons who determine the strategic priorities of the DQB must represent a broad range of registered higher education providers.

HERA brings all higher education providers who successfully apply to be registered by the OfS under the same regulatory framework and the breadth and diversity of this group should be fully represented, including representatives of all types of registration ("Registered basic", "Approved" and "Approved (fee cap)").

Note that, while not a designation condition, representation from beyond the sector (including student representation and employers of graduates) would be, where demonstrated, advantageous. The Department or the OfS may seek further information on this point from prospective bodies.

4. Confidence of higher education providers

In order to be considered suitable the body must command the confidence of registered higher education providers.

4.1 Confidence at the point of designation

This means that in order for a body to be designated, the response from the sector to this consultation has to demonstrate the confidence of a broad range of English higher education providers in that body.

4.2 Maintaining confidence in the spirit of coregulation

The DQB must maintain the confidence of the sector and the OfS throughout the period of its designation. There is also a condition in HERA that the DQB exercise its functions independent of any particular higher education provider.

5. Fees

HERA enables the DQB to be able to charge fees for the performance of its statutory functions. HERA requires that, in any 12 month period, fees payable cannot be more than the costs incurred, or to be incurred, by the body in performing its statutory functions in that period.

We expect that the level of fees is likely to be part of an ongoing dialogue between the sector, the OfS and the DQB in order to ensure that, where changes to the fees structure are required all parties fully understand the reasons in advance. However, the body must publish a statement of the amount of fees it charges and the basis on which they are calculated. The body must also publish revised statements when the amount of the fees or the basis on which they are calculated changes. The level of fees and the way that they are calculated will be part of the triennial review process undertaken by the OfS.

HERA does not preclude the DQB from charging additional fees for additional non-statutory functions that sit outside the remit of HERA if providers are prepared to pay for such services. However, these non-statutory services remain optional for higher education providers.

In addition, HERA does also not preclude the DQB from bidding for contracts with other organisations.

6. Reporting, governance and accounting arrangements

The DQB should have robust corporate governance arrangements and accounting practices. This includes complying with governance best practice, for example by having an internal audit function and separate audit committee.

HERA requires the OfS to make arrangements for holding the DQB to account for the performance of the assessment functions. The DQB has a specific duty to prepare and send to the OfS an annual report. In addition to annual reports and any more routine reporting arrangements that are put in place, the DQB will be subject to scrutiny through a triennial report prepared for the Secretary of State by the OfS.

Consultation Response Form

There is no obligation to use this form when responding, but doing so will make your responses easier to analyse. There is also no obligation to answer all the questions. We look forward to receiving your feedback. The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is 22 December 2017.

Please return completed forms to:

Catherine Gregory
Higher Education
Department for Education
Ground floor
Sanctuary Buildings
20 Great Smith Street
London
SW1P 3BT

email: HERA.CONSULTATIONS@education.gov.uk

Your Details

Name:

Email:

Organisation
(if applicable):

Address:

Please use the tick box from the list of options that best describes you as a respondent.

Higher education provider..	
<input type="checkbox"/>	...in England
<input type="checkbox"/>	...outside England (please state location below)
Body representing students on higher education course at...	
<input type="checkbox"/>	...an English higher education provider
<input type="checkbox"/>	...a higher education provider outside England (please state location below)
Student on higher education course at ...	
<input type="checkbox"/>	...an English higher education provider
<input type="checkbox"/>	...a higher education provider outside England (please state location below)
Business/business bodies	
<input type="checkbox"/>	Business representative organisation/trade body
<input type="checkbox"/>	Large business (over 250 staff)
<input type="checkbox"/>	Medium business (50 to 250 staff)
<input type="checkbox"/>	Small business (10 to 49 staff)
<input type="checkbox"/>	Micro business (up to 9 staff)
Government	
<input type="checkbox"/>	Central government
<input type="checkbox"/>	Local government
<input type="checkbox"/>	Agency or government body
Other respondent types	
<input type="checkbox"/>	Individual (non-student)
<input type="checkbox"/>	Legal representative
<input type="checkbox"/>	Trade union or staff association
<input type="checkbox"/>	Charity or social enterprise
<input type="checkbox"/>	Other (please state)
	Type: <input type="text"/>

If you selected one of the options above that asks you to state your location, please do so below.

Location (if applicable)	<input type="text"/>
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Question:

Please state whether, in your opinion, QAA is capable of meeting **all** of the above designation conditions.

QAA's expression of interest is provided as an annex to this document to help inform your decision.

Yes

No *(Please explain using the further information box)*

Not Sure

Further information (max 300 words):

Alternative suggestions

If you believe that an organisation that did not submit an expression of interest would be more suitable for the role you can provide their details below, if you wish.

Organisation name:	<input type="text"/>
Website:	<input type="text"/>
Contact:	<input type="text"/>
Brief summary of reasons for suitability (max 1,000 words)	
<input type="text"/>	

Annex: Expression of Interest submitted by QAA

Please note that while every effort has been made to reproduce the submission in its original form, some formatting changes may have occurred. The content of the submission has not been changed in any way.



Expression of Interest: the Quality Assurance Agency for Higher Education

Designation of a body to perform the assessment functions for higher education in England

The Quality Assurance Agency for Higher Education (QAA) welcomes the opportunity to present this expression of interest. Building on two decades of experience, QAA is ready to work with its partners and stakeholders to ensure the UK continues to benefit from an independent, internationally respected and forward-looking system of quality assurance.

QAA is the UK's independent, expert, higher education quality agency and is a registered charity and not-for-profit organisation. Established in 1997 through [agreement of governments, funders and the sector](#), QAA has co-regulation embodied in its governance and operations. QAA was referenced in the 2016 higher education White Paper, [Success as a knowledge economy](#), as underpinning the UK sector's international reputation for quality.

QAA safeguards standards, and drives quality assurance and enhancement for all providers of higher education. Students play a key role in its governance and are involved in all of its activities.

Since its foundation, QAA has conducted over 4,500 quality and standards reviews, adapting, innovating and evolving methods to meet the changing needs of an increasingly diverse sector; governments; students; professional, regulatory and statutory bodies; and employers.

QAA's capacity, expertise and experience demonstrate that it is the most capable and qualified organisation to perform the functions of the designated quality body in an effective and cost-efficient manner, and to lead the future direction of UK higher education quality assurance.

QAA's track record provides the evidence of its capability to perform the assessment functions presented in the *Higher Education and Research Act 2017*. QAA meets all conditions for designation as set out in the Act.

1. Capability to assess the quality of, and the standards applied to, higher education

1.1. Assessment against initial registration requirements

Over the past two decades, QAA has designed, managed and developed the UK-wide expectations for quality on behalf of the sector (the [UK Quality Code for Higher Education](#) and the UK Frameworks for Higher Education Qualifications - FHEQ and FHEQIS), to assess applicants' quality and standards for initial registration as higher education providers. QAA's capability and experience in assessing the quality of, and standards applied to, applicants' higher education provision is unrivalled. QAA also has [cooperation agreements](#) with a range of other regulators operating in UK further and higher education, to maximise efficiencies.

QAA's ability to innovate was demonstrated in its design in 2016-17 of the method for Quality Review Visits, a new gateway process for entry into higher education in England and Northern Ireland. 30 reviews were completed and 20 providers achieved successful outcomes. QAA will work alongside the Office for Students (OfS) to develop processes for entry to the register that align with the wider regulatory approach.

QAA supports the government's ambition to facilitate the entry of new, innovative, high quality providers to higher education in England. Since 2012, QAA's work has aligned with the requirements of both the Home Office and Department for Education, reviewing providers wishing to obtain course designation and/or Tier 4 licences. QAA sets a high bar, recognising and supporting high quality provision, and safeguarding student interests and the reputation of the sector from those that do not meet UK expectations. Of the 462 alternative providers that initially engaged with QAA review, 218 achieved successful review outcomes.

As the designated quality body, QAA would bring significant expertise in undertaking quality assessment for new entrants and safeguarding the reputation of the sector.

1.2. Assessment against ongoing registration requirements

QAA would draw on its substantial experience of assessing quality and standards to confirm to the OfS that providers meet ongoing registration conditions. QAA would advise and work with the OfS in designing and delivering a proportionate, risk-based approach to assessment, addressing issues as they arise.

QAA's agility in responding to changes in the policy landscape and development of new methodologies has been demonstrated repeatedly, including: the introduction of the revised models for quality assessment in England and Northern Ireland; the revised method of Enhancement-led Institutional Review in Scotland; and the new Quality Enhancement Review method for Wales.

QAA has made a significant contribution to the government's Teaching Excellence Framework (TEF) from the outset and to its continuing development, working closely with HEFCE to manage the assessment process for 299 providers in TEF Year 2.

QAA has pioneered student engagement in quality and standards, and its approach has been commended internationally. Students are embedded in QAA's governance, with two student members on its Board, and a Student Advisory Committee providing strategic input on developments in the higher education sector. QAA is committed to ensuring students are involved and empowered in shaping their learning experiences and provides opportunities for students and student bodies to do so in review and assessment methods. QAA expects providers to embed student involvement in their quality arrangements and would ensure students continue to be central to the regulatory framework.

'QAA is to be commended for its broader approach to ensuring very active student engagement in all key aspects of its work.'

[Final ENQA report](#) on its 2013 review of QAA

QAA would work with the OfS to safeguard the interests of students, addressing weaknesses in the management of academic quality and standards. For England and Northern Ireland, QAA already undertakes investigations referred to it under the Unsatisfactory Quality Scheme. For Scotland and Wales, and for all UK alternative providers, it operates its own [Concerns Scheme](#). From 2012-16, QAA dealt with almost 2,000 general enquiries and handled 322 cases. Improvements made as a result of the Scheme have had a direct and positive impact on the academic experiences of students and providers.

1.3. Guidance for higher education providers

QAA has proven experience in delivering effective advice and guidance for higher education providers. It has developed, consulted on and published handbooks and related guidance for reviews, and briefings on other quality and standards issues. During 2016-17, QAA's published guidance included review handbooks for transnational education, Quality Review Visits, and new methods in Scotland and Wales. It uses new technologies and methodologies such as podcasts and webinars to disseminate its findings and to engage with the sector in a cost-effective way, enabling targeted messaging to relevant groups.

QAA has worked with the sector to develop, maintain and review the UK Quality Code and associated guidance that is accessible for providers and other stakeholders. This has included: case studies on using the Quality Code in practice; workshops; guidance for non-technical audiences; toolkits for specific groups (such as colleges); and the development of online tools. QAA is currently working with the sector and the UK-wide Standing Committee on Quality Assessment to revise the Quality Code.

QAA has been a significant contributor to recent major policy developments including: advice and guidance on the TEF; higher and degree apprenticeships; accelerated degrees; credit frameworks; and tackling plagiarism and essay mills.

QAA publishes thematic analyses on wider trends and good practice. Its online Knowledgebase includes 3,148 examples of good practice, 5,548 recommendations and 415 affirmations from its reviews since 2009. Feedback from QAA subscribers has led to work on topics including student transitions and the role of student satisfaction data in quality assurance and enhancement.

2. Advice on degree awarding powers

Since its foundation, QAA has provided expert advice to UK government and all devolved administrations on applications for degree awarding powers and university title. Its advice has led to 80 successful applications since 2004. QAA works with potential applicants to improve their understanding of the requirements and expectations associated with applying for degree awarding powers.

The process of applying for, and granting, degree awarding powers has evolved over time. QAA has advised government on revisions to the criteria and, more recently, the publication of scrutiny reports and the inclusion of student members on all review teams. QAA is already working on methods to integrate registration and application for probationary degree awarding powers, to simplify the process for new applicants.

Detailed scrutiny of the evidence provided by an applicant is undertaken by peer assessment. The independent [Advisory Committee on Degree Awarding Powers](#) (ACDAP) considers the outcomes from peer assessment, together with the evidence submitted by the applicant, and makes recommendations to QAA's Board, which then determines the nature of advice to be provided.

ACDAP has evolved, for example with the addition of a student member in 2014, and on 7 September 2017 it recommended changes to its membership to ensure alignment with the Act's requirements. The committee also recognised the need for reform of its processes and has commissioned a review to ensure these are fit for the new regulatory environment.

3. Sector-wide representation

QAA's strategic priorities are determined by its [Board](#). All 18 Board members are unpaid non-executive directors and are trustees for the purposes of charity law. The Board structure embodies co-regulation, representing all sections of English and wider UK higher education, including students, universities, further education colleges and alternative providers, with a rich mix of skills and experience. The six independent Board members, with their expertise in industrial, commercial, financial and professional practice, provide an external perspective that furthers the Board's public interest remit. The independent directors are the largest group, ensuring that no one sector interest can dominate. The Chair of the Board must be an independent director.

QAA regularly reviews its governance arrangements to ensure the Board operates in line with best practice and charity law.

4. Confidence of higher education providers

4.1. Confidence at the point of designation

QAA is respected and trusted as the UK's independent quality body, both nationally and internationally. Its work commands the respect of the sector because it is developed and shaped with and by the sector, students and other key stakeholders. QAA works with over 600 providers including universities, colleges and alternative providers, giving it unparalleled knowledge, experience and insight across the full provider range. QAA engages strategically and operationally with the sector, its representative bodies, mission groups and individual providers of all types.

'In terms of the quality and regulation landscape, there is widespread recognition of the significant role that the QAA has long played in the sector, and the importance of co-ownership of the quality regime...'

[Report of the Universities UK Review Group](#) on UK Higher Education Sector Agencies
(January 2017)

QAA is an international leader, influencing key areas of policy including the Bologna Process, the European Standards and Guidelines for Quality Assurance, and the qualifications frameworks for the European Higher Education Area.

QAA's case to become the designated quality body for England is officially supported by, and has the confidence of, the following bodies:

- Association of Colleges
- Guild HE
- Independent Higher Education
- National Union of Students
- Universities UK.

QAA commands the confidence of the wider UK sector, demonstrated through separate agreements this year with Universities Scotland and Universities Wales to exclusively undertake external quality assessments of their higher education providers until 2023.

This facilitates coherence and QAA is uniquely positioned to unify approaches to quality across the four nations.

QAA is responsible for assuring transnational education (TNE) for the UK sector, underpinning

its world-class reputation. It has undertaken reviews in countries including China, Hong Kong, India, Malaysia, Russia, Singapore and the United Arab Emirates, and operates 15 formal strategic relationships with quality bodies overseas, to provide confidence in UK TNE provision.

QAA has been internationally recognised through recent awards from [INQAAHE](#) and the [Asia-Pacific Quality Network](#).

4.2. Maintaining confidence in the spirit of co-regulation

QAA was created as a key partner in the system of co-regulation. To maintain the confidence of the sector and the OfS, as the designated quality body QAA would continue to be:

- Expert and authoritative
- World-class
- Innovative and responsive
- Driving UK-wide consistency of higher education standards
- Not-for-profit and mission-led
- Independent and accountable
- Collaborative
- Committed to working with and for students
- Cost-efficient and effective.

QAA would maintain sector confidence and dialogue through its Board, advisory committees, sector Sounding Board, annual subscriber surveys, networks, events and consultations. QAA's provider liaison programme enables it to exchange intelligence and ideas, and facilitate invaluable insights into the needs of providers. QAA's staff have great breadth and depth of expertise, and its reviewers are drawn from senior staff across the entire sector.

'As well as discharging statutory requirements on behalf of HEFCE (mainly around quality assessment), the sector works with the QAA to support and develop quality assurance and the academic infrastructure within institutions, recognising that ultimately the standards and quality of higher education rest primarily with autonomous institutions... This is a widely admired self-regulatory approach that is unique to the UK and fundamental to the maintenance of academic standards.'

Quality, equity, sustainability: the future of higher education regulation,
[Report of the Universities UK Regulation Task and Finish Group](#) (February 2015)

QAA is a company limited by guarantee and a registered charity. It does not have constitutional links with government or individual higher education providers.

Whilst independent, QAA listens carefully and responds to its full range of stakeholders in developing its plans and quality assurance processes.

We confirm that, in respect of Condition D for designation in the *Higher Education and Research Act 2017*, QAA is a body corporate, and not a servant or agent of the crown, or a body to which the Secretary of State appoints members.

'This is the hallmark of the QAA - that they work in partnership with the sector and, indeed, in partnership with government. But they maintain a sufficient distance and they are known to be independent, and this is the essence of the reputation of UK higher education. There is a secure regulatory foundation and set of guidelines in the [Quality] Code, but the QAA is independent and therefore to be trusted.'

Professor Janet Beer, Vice-Chancellor, University of Liverpool,

QAA's internal safeguards ensure the integrity of decision making. Judgements from reviews are made by teams of independent peer reviewers, following published process and their judgements cannot be influenced, other than at appeal. It has robust mechanisms and policies in place to ensure that those undertaking work on its behalf act in a fair and impartial manner. All QAA reviewer contracts include a code of practice, and copies of its ethical conduct and anti-bribery policy, to prevent conflicts of interest.

As a founding member of the European Association for Quality Assurance in Higher Education (ENQA), QAA is reviewed every five years to ensure it meets [European Standards and Guidelines](#), including being fully compliant with the independence requirement. The expert panel from QAA's most recent review in 2013 reported:

'QAA's overall performance against the standards of the ESG [European Standards and Guidelines] is uniformly high. It is a trustworthy, effective and highly credible agency and a leader in the field.'

[Final ENQA report](#) 2013 review of QAA

As a forward-looking, strongly stakeholder-focused organisation, QAA will continue to develop its deep understanding of both individual providers and the sector. Its approach embodies co-regulation, embedding the autonomy, expertise and academic freedom of UK providers, while ensuring that stakeholders in higher education, including students, continue to be partners with roles to play.

5. Fees

QAA is highly experienced in ensuring transparent separation of different funding streams and their allocation, and already meets this requirement through its work with the UK's funding bodies, the Home Office and Department for Education (see section 6). Taking account of [Treasury guidelines](#), QAA would ensure clear and transparent separation of fees and charges for the performance of statutory and non-statutory functions, by publishing a statement of the fees it charges and the basis on which they are calculated. QAA would work with the OfS and the sector to determine what would be chargeable as statutory functions.

QAA manages a complex financial portfolio with a variety of funding arrangements across the UK and internationally. It is experienced in providing detailed analysis to the funding bodies on its method for allocating charges. This provides confidence in QAA's financial management and that it delivers value for money. There is no cross-subsidy of any non-statutory functions by statutory ones. By generating additional revenues, QAA acquires economies of scale. Where it undertakes other contracted activity, this is aligned with its charitable objects as set out in its [Articles of Association](#).

6. Reporting, governance and accounting arrangements

QAA operates a robust system of corporate governance and accounting practices.

The Board governs QAA in line with its Articles of Association, vision, mission, values, aims and charitable objects. The Board is responsible for compliance with legal and statutory requirements and with the published [Code of Practice](#). QAA is regulated by the Charity Commission for England and Wales and the Office of the Scottish Charity Regulator.

The Board is supported in its decision making by its [governance and advisory committees](#).

New Board members attend an induction programme covering the work of QAA, governance, operations and strategic plans. Guidance is provided on their responsibilities and good practice as charity trustees.

Day-to-day management of QAA is delegated by the Board to the [Chief Executive](#) through a scheme of delegation and financial regulations. Rigorous planning and reporting processes are in place, giving the Board confidence that QAA is being managed effectively.

QAA has a strong track record in internal and external audit. Internal auditors report three times each year to the Audit and Risk Committee on their findings. This informs the Committee's annual opinion to the Board on arrangements for risk management, control and governance, and for economy, efficiency and effectiveness (value for money).

QAA publishes and monitors a reserves policy as part of the published annual reports presented to its annual general meeting of members. This provides financial stability to ensure it can deliver the requirements of the OfS and the sector. An Honorary Treasurer provides assurance to the Board on the financial aspects of QAA's work.

QAA is a not-for-profit organisation, robustly accountable for the delivery of its work programmes, with significant experience in producing annual reports for the UK funding bodies and their advisory committees.



Department
for Education

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