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TECHNICAL PAPER

RECOMMENDATIONS FOR THE CONTENT OF MANUALS FOR THE INSPECTION OF HIGHER EDUCATION INSTITUTIONS

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INTRODUCTION

This Technical Paper is part of on-going assistance by the Project against Corruption in Albania (PACA) to the Ministry of Education and Science. Under Activity 4.1 of the PACA Extension Workplan – 'Policy advice to follow up with actions to implement recommendations of PACA Education System/Human Resources Risk Assessment and Assessment of Regulation of Private Education Institutions', specific activities planned were to determine (with Ministry of Education and Science [MoES] and other relevant bodies) needs for the elaboration of rules and procedures for processes of inspections of private higher education institutions (HEIs), and then to provide proposals on manuals for inspections of HEIs.

The current Technical Paper is the third and final paper to address this topic between June and September 2012, provided by experts from the General Teaching Council of Scotland. The first provided an overall 'Assessment of Provisional System of Inspections of Higher Education Institutions and Recommendations for the Future Inspection System' (PACA June 2012, ECU-PACA-7/2012), and made a broad range of recommendations for a future system of review of Albanian HEIs for quality assurance and enhancement. The second focused more specifically on the Albanian Law on Higher Education in relation to the inspection of HEIs, and provided an 'Assessment and Recommendations concerning Draft Amendments to the Law on Higher Education Regulating Inspections of Higher Education Institutions, and Sub-Legal Acts to Implement the Law' (PACA July 2012, ECU-PACA-8/2012). The recommendations in the second paper sought to ensure that any future legal framework for Higher Education (HE) in Albania secures the type of review of HEIs for quality enhancement and assurance which had been recommended in the first Technical Paper. The current Technical Paper focuses on the content of manuals for the inspection of HEIs, providing a list of manuals needed and detailed recommendations on coverage of the following within manuals:-

- (a) The criteria for launching inspections in HEIs
- (b) Procedures for the inspection process, including all aspects of the inspection process from decisions on carrying out an inspection to the final inspection report
- (c) Inspection standards, i.e. criteria by which education institutions should be judged, and how the criteria in question should be measured/assessed
- (d) The format/structure of inspection reports

As will be discussed in Section 2 below, the current Paper will generally use the experts' preferred term – 'quality enhancement and assurance' - rather than 'inspection' of HEIs. The experts believe that using this term has additional advantages in the Albanian context, where 'inspection' is understood almost exclusively as a process of 'top-down' detection of violations of laws or rules. As the previous two papers have underlined, while inspections should indeed identify such violations and notify further where they are detected, this should not be the primary focus of inspections of education institutions.

In providing the guidance contained in this Technical Paper, the experts have drawn heavily upon the documentation and procedures of the Quality Assurance Agency for Higher Education (QAA) in the UK, both the QAA's general approaches UK-wide and the QAA's particular approaches in Scotland. The experts judge these UK and Scottish approaches to be highly appropriate examples of European best practice. On the other hand, as mentioned in Section 2, the experts also wish to emphasise that they have not been asked to provide the actual content of Review Manuals as such, but rather recommendations on what should be covered in actual content.

Therefore, the experts have used the UK and Scottish references to give recommendations at a level of detail which will give the relevant Albanian stakeholders the necessary space to produce the final, full detail of content for local circumstances. However, the experts would urge that this detail is finalised in a way which is consistent with the specific Recommendations within the current Technical Paper, and with the underlying principles of a new national system for HE quality enhancement and review, as developed especially in the experts' first Technical Paper. The experts look forward to developing discussion of these approaches further in forthcoming working meetings with relevant MoES officials.

1 SUMMARY OF FINDINGS AND RECOMMENDATIONS

• General approach to recommendations for content of manuals for review of HEIs

Recommendation 1: Consistent with the principles outlined in the experts' earlier Technical Paper 'Assessment of Provisional System of Inspections of Higher Education Institutions and Recommendations for the Future Inspection System' (PACA June 2012), the content of manuals for 'inspection' of Higher Education Institutions (HEIs) should be presented as far as possible as details for a system of Higher Education (HE) review for quality enhancement and assurance. There should be four manuals:

- A Manual on Criteria for Launching Reviews;

- A Manual on Procedures for All Aspects of the Review Process (with formal sub-sections on The HEI's Self-Evaluation Document, 'Exceptional Circumstances' Response by the HE Quality Agency, The Review Team, The Review Visits, and The Reporting Process);

- A Manual on Review Standards;
- A Manual on the Format and Structure of Review Reports.

Recommendations in the current Technical Paper should be considered alongside the related Recommendations 7.1-7.5, 8.1-8.5 and 9.1-9.5 from the June Technical Paper, and seen as consolidation and extension of these earlier Recommendations. In implementing Recommendations on the content of HE review manuals, the approaches and documentation of the Quality Assurance Agency for Higher Education (QAA) in the UK generally, and Scotland specifically, should be seen as particularly helpful exemplars of European 'best practice' approaches.

• Detailed recommendations for manual content on criteria for Launching reviews

Recommendation 2.1: The Manual on Criteria for Launching Reviews should set a clear framework for the overall national review of HE for quality enhancement and assurance, distinguishing between the full, regular reviews which all HEIs will experience every four years, additional reviews which may be conducted for any HEI giving 'specific cause of concern', and the annual 'engagement' which each HEI will have with the national HE quality agency. The framework should also confirm that the national timetable for full, regular reviews will give immediate priority to the full review of all private HEIs.

Recommendation 2.2: The Manual on Criteria for Launching Reviews should provide full details on the nature of the annual 'engagement' between the national HE quality agency and each HEI. These details should include:

- (a) Full specifications on the annual report which each HEI will submit to the agency. These guidelines should include specifying a standard format for providing institutional profile information on student numbers at the three cycles, student assessment data and analysis, and staff numbers and profiles. The guidelines should also indicate the level of detail required in summaries of internal quality assurance activities during the year. A national timetable should be provided indicating when reports are required, and establishing an appropriate time-frame between receipt of the report and the annual meeting (see below).
- (b) Full guidelines on the annual meeting to be held between the HE quality agency and the HEI. The guidelines should clarify the level of seniority of the agency official who will represent the agency, and indicate the type of HEI representation expected at the meeting (based on a small number of senior staff, including the head of the HEI). Exemplar agenda for the meeting should be provided. The nature of the record of meeting to be provided by the agency, including the format for a note of any action points for the HEI, should be clarified, in particular if the meeting gives rise to a 'specific cause of concern' for the agency (see below).

Recommendation 2.3: The Manual on Criteria for Launching Reviews should provide full protocols on the launching and conducting of additional quality reviews outside the cycle of regular reviews, where specific causes of concern have arisen over an HEI. These protocols should:

- (a) Illustrate the type of evidence which may lead to the HE quality agency initiating a 'specific cause of concern' review after its annual 'engagement' with an HEI.
- (b) Distinguish between complaints about individual treatment (e.g., an individual's dispute about specific academic judgements within assessment marking) and concerns over serious systemic or procedural problems with an HEI (e.g., an HEI's systemic failure to follow appropriate assessment procedures), and outline a communication strategy to ensure that other stakeholders appreciate this distinction.
- (c) Specify how other stakeholders (which could include central government, academic staff, students, the general public and the press) can formally raise a 'cause of concern', including the format for any such communication to the HE quality agency, and the protocols for its initial receipt by the agency, including timeframes for acknowledgement and response, and any appropriate position on confidentiality to be taken by the agency.
- (d) Clarify the nature of the initial inquiry into a 'specific cause of concern' by HE quality agency staff, and how findings will then be reported (including any 'action points' for the HEI) where it is judged unnecessary to proceed to a full investigative review after an initial inquiry stage.
- (e) State criteria for an HE quality agency decision to move from the initial inquiry stage on 'a specific cause of concern' to a full investigative review by a normal review team, and provide guidelines for the review team's decision-making on how far it should

then focus exclusively on the issues of concern, or widen the review to other aspects of the HEI's provision. Associated guidelines will also be required on how a review team is to report, if the review does not widen sufficiently to enable the standard review report format to be used (see Recommendations 5.1-5.4 below for the standard report format).

Recommendation 2.4: The Manual on Criteria for Launching Reviews should provide guidance on the depth of focus to be given by reviewers to the various aspects of an HEI's provision when conducting regular, full reviews. While reviewers should cover all aspects of provision sufficiently to assure themselves that appropriate quality standards are being sustained and enhanced, it may be necessary for a review team to give more intensive focus to particular aspects of provision, where initial evidence for quality enhancement and assurance may be less convincing. Guidance should illustrate what may make initial evidence unconvincing, principally the omission of key information from the HEI's self-evaluation document, or the highlighting of a particular issue by the HEI within its self-evaluation document, and the content to be included within each section. The review team should make systematic use of Recommendation 3.1 as a check-list for identifying omissions of key information or suggestions of 'negative concerns' in the HEI's own self-evaluation.

• Detailed recommendations for manual content on procedures for all aspects of the review process

Recommendation 3.1: The Manual on Procedures for All Aspects of the Review Process should include a sub-section on the HEI's Self-Evaluation Document. This should provide clear instructions on overall length and style, and on the content which HEIs should include within each section of the institution's Self-Evaluation Document. For example, for individual sections (as numbered in Recommendation 8.1 of PACA's June Technical Paper), these instructions should include:

For Section (1), <u>An Introductory section</u>: specification of the type of information to be included in an institutional profile; examples of the type of recent changes and developments within an HEI which could be regarded as 'key' in the context of review for quality enhancement and assurance; an indication of the level of detail looked for in describing how the Self-Evaluation Document has been produced, including how staff and students have been involved.

For (2), <u>A Management of the student learning experience section</u>: definitions of the type of student information which needs to be managed effectively in relation to quality enhancement and assurance; examples of the type of activity involved in effectively engaging and supporting students in the learning experience, effectively managing the student learning environment, and effectively providing staff support and development to promote appropriate student learning.

For (3), <u>An Institution-led monitoring and review of quality and standards section</u>: specification of the types of external reference points on quality and standards which could be used in institution-led monitoring and review, and specification of the type of information about quality and standards, including public information, which could be managed to support monitoring and review; illustrations of the aspects of assessment policy and practice which need to be managed effectively to set and maintain academic

standards; examples of how monitoring and review can be linked to enhancement of quality and standards.

For (4), <u>A Strategic approach to quality enhancement section</u>: a definition of the level of approach to quality enhancement which can be regarded as 'strategic' for an HEI; specification of relevant external reference points for national and international best practice in quality enhancement, and examples of how an HEI could use these effectively in its own quality enhancement; examples of possible effective internal dissemination of good practice on quality enhancement within an HEI.

For (5), <u>A Conclusion section</u>: guidance on the length of this summary section, and the extent to which it should repeat earlier points or introduce new ones; any indication of whether the HEI should be asked to give an overall self-evaluation against the judgement criteria which will subsequently be used by the review team.

Recommendation 3.2: The Manual on Procedures for All Aspects of the Review Process should include a sub-section clarifying the type of evidence from a private HEI's Self-Evaluation Document which will make it appropriate for the national HE quality agency to contact the Ministry of Education and Science (MoES) immediately with a view to suspending or removing the HEI's licence, without proceeding to a full review process. Such evidence is likely to include:

- (a) Absence of information in the Introductory section establishing that the HEI meets the basic criteria for relevant HEI status (in terms of the cycles of higher education offered, and minimum numbers of faculties, departments and full-time academic staff) as specified in the relevant existing Albanian Government documentation (see Recommendation 4.2 below).
- (b) Consistent failure to demonstrate that there is effective management of an appropriate student learning experience.
- (c) Consistent failure to demonstrate that there is effective institution-led monitoring and review to maintain appropriate academic standards.
- (d) Absence of any strategic approach to quality enhancement at institutional level.
- (e) Compelling, even if indirect, evidence of dishonest illegal activity.

Recommendation 3.3: The Manual on Procedures for All Aspects of the Review Process should include a sub-section detailing criteria for the various categories of Review Team members. In particular, these criteria should comprise the following:

- (a) For senior Albanian academic peer reviewers (typically 3 per Team): current or recent (within the past three years) wide experience of HE quality assurance and enhancement, preferably including academic management at the institutional level; personal and professional credibility with HEI staff, including heads of institution, other senior managers, and staff currently engaged in learning and teaching; knowledge and understanding of the new national HE review system for quality enhancement and assurance, including through undertaking any required training.
- (b) For senior international academic peer reviewers (1 per Team): current or recent (within the past three years) wide experience of internal HE quality assurance and

enhancement, preferably including academic management at the institutional level; current or recent (within three years) experience of external review of HEIs in their own country or elsewhere, either as a review team member or through senior involvement with a quality enhancement and assurance agency; international comparative knowledge and understanding of HE quality enhancement and assurance; knowledge and understanding of the new Albanian HE review system for quality enhancement and assurance, by undertaking initial familiarisation reading.

- (c) For student reviewers (1 per Team): current or recent (within the past year) experience of study at an Albanian HEI, with a minimum period of HE study to date of the equivalent of one year's full-time education; experience of representing students' interests at institutional (including Faculty or departmental) level and/or regional/national level; knowledge and understanding of the new national HE review system for quality enhancement and assurance, including through undertaking any required training.
- (d) For the coordinating reviewer: current or recent (within the past three years) wide experience of HE quality assurance and enhancement at institutional management level, either in a relevant senior academic or senior administrative post; wide experience of working with senior committees in HE, preferably with experience as a chair; wide experience of leading teams in the HE context; credibility with HEI staff, including heads of institutions, other senior managers, and staff currently engaged in learning and teaching; knowledge and understanding of the new national HE review system for quality enhancement and assurance, including through undertaking any required training.
- (e) For the supporting member of staff from the national HE quality agency: holding a permanent post with the new national HE quality agency of sufficient seniority to achieve credibility with HE staff, including heads of institutions and other senior managers.

In addition, the Manual on Procedures for All Aspects of the Review Process should clarify the respective roles within the review process of the coordinating reviewer and the supporting senior national quality agency permanent staff member. In particular, the Manual should confirm that, while the coordinating reviewer is no more than 'primus inter pares' in ensuring that the Review Team moves towards collegial and collective decision-making, the senior national quality agency staff member simply services the Team (for example, while the national agency staff member may work on draft Reports, this will only be at the direction of the coordinating reviewer, who in turn will be reflecting the views of the Review Team).

Recommendation 3.4: The Manual on Procedures for All Aspects of the Review Process should include a sub-section detailing the types of activities to be included within the Review visits to HEIs, including full exemplar programmes for typical days. In particular, details should include:

(a) For the part one visit (lasting two days): The first half day should involve the HEI providing a programme of activities (presentations etc.) to give an overview of its provision and approaches. The rest of day one and most of day two should include a meeting with a group of senior staff, a meeting with student representatives, and a meeting with a wider group of staff who have particular experience of the HEI's

internal quality review activity. The later part of day two should involve the Review Team sharing with the HEI themes for the part two visit and establishing a draft programme for that visit, including specifying the particular documentation which the Review Team wishes the HEI to provide for the Team's consideration, and the particular types of staff and student groups which the Team will wish to meet.

(b) For the part two visit (lasting three to five days, and taking place four weeks after the part one visit): The programme for this visit should give the Review Team opportunities to consider documentation requested from the HEI and relating to themes identified during the part one visit, and opportunities to meet with a wider range of staff and students, again particularly with agendas for meetings related to themes identified during the part one visit. The final day of the part two visit should provide significant time for a private meeting of the Review Team to agree conclusions and compile an outline draft report.

Recommendation 3.5: The Manual on Procedures for All Aspects of the Review Process should include a sub-section providing a summary overview of the timetable and general nature of Review reporting. This will confirm that the senior national HE quality agency official supporting the Review will send a formal letter to the HEI summarising the provisional conclusions of the Review within a week of the part-two visit, followed by a draft of the full report, and a shorter summary of this, within eight weeks of the part-two visit. The Manual should confirm that agreed versions of the full and summary reports will appear on the national HE quality agency's website within twelve weeks. The Manual should specify that HEIs can only seek amendments to draft reports on issues of fact and cannot dispute the reviewers' judgements. However, full guidance on the writing of reports should be provided in the Manual on the Format and Structure of Review Reports (see Recommendations 5.1 to 5.4 below).

• Detailed recommendations for content of manual on review standards

Recommendation 4.1: The Manual on Review Standards should provide details of the types of 'dishonest illegal activity' which would require the national HE quality agency to refer the HEI to the relevant law enforcement agencies, if evidence of such activity emerged during the Review process. Such activity will include 'academic irregularity' (e.g. awarding degrees under false pretences to students who have not completed appropriate courses and assessments successfully), as well as other illegal activity such as 'financial irregularity'. The Manual should include any specific reference to 'non-education' Albanian laws which relevant law enforcement agencies may view as useful for HE quality agency staff to have knowledge of. The Manual should also make clear exactly how the HE quality agency will contact other agencies (including law enforcement as appropriate) and how, if at all, the agency will be involved in subsequent developments following reference to law enforcement agencies.

Recommendation 4.2: The Manual on Review Standards should provide detailed crossreferences to the existing Albanian Government documentation which specifies the basic criteria for relevant HEI status in terms of the cycles of higher education offered, and minimum numbers of faculties, departments and full-time academic staff. This documentation recently included Chapter II of the 2007 Law on Higher Education (Albanian Parliament 2007); Chapters I, II and III of 'State Quality Standards Of Higher Education Institutions (HEI) (MoES 2011a); and Appendix 2 of 'Procedures And Documentation For The Opening Of A Private Higher Education Institution, Programmes Of Graduate Studies In The First And Second Cycle, Programmes Of Non-Graduate Studies, Of Professional Nature And Also Procedures For Suspension And Revocation Of License' (MoES 2011b). Documentation may also include equivalent and relevant sections of 2012 versions of the 'State Quality Standards' (PAAHE 2012 abcd) only made available to the experts after the current Technical Paper was drafted. The Manual should also provide summaries and extracts of the relevant sections of this documentation.

Recommendation 4.3: The Manual on Review Standards should provide full statements on the academic standards which HEIs must set and maintain. These statements should include full details on:

- (a) The requirements for the relevant levels of the three consecutive cycles of higher education, including detailed cross-references to existing Albanian Government documentation which provides detail on these. The content of this documentation is the same as specified under Recommendation 4.2 above. Summaries and extracts of the relevant sections of this documentation should also be provided in the Manual.
- (b) The format, with associated guidelines and exemplars, for how HEIs should present aims, intended learning outcomes and expected learner achievements for programmes of study.
- (c) The criteria to be met if processes to approve and review the validity and relevance of programmes of study are to be judged as effective, with associated underlying definitions of programme validity and relevance.
- (d) Explanations, with examples, of what constitutes appropriate independent and external participation in the management of academic standards, including for external examiner processes in particular.
- (e) Definitions of what constitutes robust, valid and reliable student assessment, and examples of how institutions ensure such approaches to assessment, including how the award of qualifications and credit is based on the achievement of relevant intended learning outcomes.

Recommendation 4.4: The Manual on Review Standards should provide full statements on how HEIs must assure, and continuously and systematically enhance, the quality of learning opportunities provided for students. These statements should include full details on:

- (a) Explanations, with examples, of what makes student admissions policies and procedures clear, fair, and consistently applied.
- (b) Minimum requirements if strategies for learning and teaching are to be judged appropriate, including specifically for flexible and distance learning, and for work-based and placement learning. Additionally, exemplars of relevant best practice in learning and teaching strategies should be provided, which will demonstrate possible approaches for continuous and systematic enhancement.

- (c) Criteria for effective arrangements to support students in their learning, including specifically arrangements for careers education, information, advice and guidance, and for appropriately meeting the requirements of disabled students.
- (d) Explanations, with examples, of how students can be appropriately and fully engaged in quality assurance and enhancement processes.
- (e) Explanations, with examples, of how assessment practice can promote effective student learning. Minimum requirements should be specified concerning what leval and content of feedback to students on assessed work is to be judged as appropriate, timely, and facilitating improvement. Additionally, exemplars of relevant best practice in assessment and feedback to students should be provided, which will which will illustrate how assessment practices can be enhanced.
- (f) Explanations, with examples, of how external examiners can be given opportunities to provide comment and recommendations on the continuous innovation and enhancement of assessment practices, and on their impact on the quality of learning opportunities provided to students.
- (g) Definition of 'fit for purpose' in relation to assessment procedures and regulations, and explanations, with examples, of how these procedures and regulations should be regularly reviewed by the HEI to ensure they remain 'fit for purpose'. The definition and explanations should emphasise the importance of: appropriate and clear statements on the role of assessment panels and boards of examiners (including membership, procedures, powers and accountability); appropriate and clear rules on progressing from one stage of a study programme to another , and on qualifying for an overall academic award; consistency across the institution in recording student marks and providing clear information on these to students; effective institution-wide systems for monitoring and reviewing assessment performance, including analysing trends in student results.
- (h) Criteria for effectiveness of programme curriculum and assessment in enabling students to achieve appropriate intended learning outcomes. Explanations should be provided, with examples, of how an HEI should conduct on-going evaluation of this effectiveness, and ensure that this evaluation complements periodic formal approval and review of programmes.
- (i) Explanations, with examples, of how HEIs should provide procedures for handling students' complaints and academic appeals which are to be judged fair, effective and timely.

Recommendation 4.5: The Manual on Review Standards should give full guidance on the types of public information which HEIs are to provide if this information is to be fit for purpose (full and sufficient), accessible and trustworthy. This guidance must include full details on:

(a) Definitions of what constitutes 'fit for purpose (full and sufficient), accessible and trustworthy' in relation to public information provided by organisations such as HEIs. The definitions should emphasise the importance of the following features of the public information provided by HEIs: to be fit for purpose (full and sufficient),

information must be current and comprehensive enough to meet the requirements of a diverse audience, including potential students, current students, potential employers of graduates, public authorities, the wider public, and interested members of the international community; to be accessible, information must be transparent, and easily available and retrievable, including meeting the access requirements of a diverse audience; to be trustworthy, information must be accurate on individual detail, and overall give a fair reflection of what the HEI has to offer.

- (b) The format, with necessary information specified, for HEIs to present factual details on the institution's academic organisational, leadership and management structure; student numbers (in different subjects and at different levels); staff details (including numbers and qualifications); summary statistics of student programme completions and qualifications awarded.
- (c) Explanations, with examples, of how HEIs can describe their institution's mission, values and overall strategy.
- (d) Specification of what HEIs should include in a description of the process for student application and admission.
- (e) Criteria for the details to be provided by HEIs for prospective students, which will enable these details to be judged sufficient for prospective students to make informed selections of programmes based on an understanding of the institution's academic environment and of the support which it will make available to students.
- (f) Specification of what HEIs should include in full details of programmes of study to be made available to current students at the start of their programme and throughout their studies.
- (g) Criteria for 'clear' statements by HEIs of what the institution expects of current students, and what current students can expect of the institution.
- (h) Specification of the format and content for the detailed record of their studies to be issued by HEIs to students when they leave their programmes of study, so that this provides full evidence of students' achievements on their programme for others, such as future employers or other educational institutions.
- Detailed recommendations for content of manual on the format and structure of review reports

Recommendation 5.1: The Manual on The Format and Structure of Review Reports should provide full definitions of the following three standard types of overall judgement on an HEI's provision which may be reached in the Review Report, namely:

- (a) A judgement of 'confidence' in the Higher Education Institution should be reached where the Review Team finds the HEI is managing the security of academic standards and the quality of the student learning experience effectively and this is likely to continue in the future, including the HEI taking appropriate steps to enhance the quality of the student learning experience continuously.
- (b) A judgement of 'limited confidence' judgement should be used where the Review Team finds evidence there are substantial limitations to the HEI's current capacity to

manage effectively the security of academic standards and/or the effectiveness of the student learning experience , or such limitations are likely to emerge in the future. In making this judgement, the Review Team will indicate clearly the areas of concern where improvements need to be made.

(c) A 'no confidence' judgement should be used where the Review Team finds there are serious and fundamental weaknesses in the HEI's capacity to secure the academic standards of its awards and/or to maintain an appropriate quality of educational provision. In making this judgement, the Review Team will indicate clearly the specific areas of serious and fundamental weakness.

Recommendation 5.2: The Manual on The Format and Structure of Review Reports should provide full guidance on how commentaries are to be made in the full Review Report on the management of the student learning experience, institution-led monitoring and review of quality and academic standards, and strategic approach to quality enhancement. Commentaries should certainly include the following details, but may also include reference to any other relevant specific aspects of the Review Standards detailed in Recommendations 4.1-4.5 above:

- (a) On the management of the student learning experience, the Report should comment on the effectiveness of the HEI's approach to: managing information about its student population; managing the learning environment; engaging and supporting students in their learning; promoting equality of opportunity and effective learning for all of its students; promoting the development of graduate attributes, including those relating to employability, in all of its students; supporting and developing staff to promote effective learning for their students.
- (b) On institution-led monitoring and review of quality and academic standards, the Report should comment on the effectiveness of the HEI's approach to: self-evaluation, including the use made of external reference points; the management of information to inform the operation and evaluation of its monitoring and review activity; setting and maintaining academic standards, including the management of assessment; managing public information about quality and academic standards, including the linkage with the institution's monitoring and review arrangements; linking of the institution's monitoring and review processes to its enhancement arrangements.
- (c) On strategic approach to quality enhancement, the Report should comment on the effectiveness of the HEI's implementation of: its strategies and policies for promoting quality enhancement across the institution; its use of external reference points, including national and international practice, in the institution's approach to quality enhancement; its identification, dissemination and implementation of good practice in the context of the institution's strategic approach to enhancement.

Recommendation 5.3: The Manual on The Format and Structure of Review Reports should provide clear explanations on the differing levels of detail provided in the full Review Report, the shorter summary Report and the initial Report letter sent by the national HE quality agency to an HEI.

- (a) As discussed under Recommendations 5.1 and 5.2 above, the full Review Report should provide full commentaries on each of the three broad areas: management of the student learning experience; institution-led monitoring and review of quality and academic standards; strategic approach to quality enhancement. These commentaries should cover the relevant areas in sufficient detail to inform fully the staff of the HEI, the wider HE community, officials from the national HE quality agency, and officials from central Government. The commentaries should be followed by the overall judgement on the HEI's provision.
- (b) The summary Report should set out the overall judgement in full, but the summary Report's presentation of the material covered in the full Report's commentaries should be briefer and written for a wider informed lay audience, rather than the more specialist audience envisaged for the full Report. Given the less specialist target audience, the summary Report's presentation of the full overall judgment may also be supplemented by any necessary brief explanatory text.
- (c) The initial Report letter will simply summarise the provisional overall judgement reached by the Review Team, together with a summary of 'key themes' to have emerged during the Review.

Recommendation 5.4: The Manual on The Format and Structure of Review Reports should provide clear guidance on how the full Report should present the various follow-up actions which may be required after a Review.

- (a) For a 'confidence' judgement, this will involve specifying the format for the year-on report to be made by the HEI to the national HE quality agency, with this report including an indication by the HEI of its on-going enhancement activity following the Report, in particular activity relating to any specific themes highlighted in the Report.
- (b) For a 'limited confidence' judgement, this will involve clarifying how the HEI will specifically demonstrate that it has met the requirements of the action plan set by the national HE quality agency as part of the Review Report. Clarification should also be provided on how the quality agency will keep MoES informed of developments with 'limited confidence' HEIs.
- (c) For a 'no confidence' judgement for a private HEI, this will involve indicating any potential circumstances in which an HEI may be given opportunity for remedial action, and the forms which such remedial action may take, as an alternative to immediate moves by the HE quality agency on the suspension/removal of the HEI's licence. The protocols on the respective roles of the HE quality agency and the MoES on such suspensions/removals of licences should be clarified. For a 'no confidence' judgement for a public HEI, there should be clarification on the nature and timeframes for remedial action by the HEI, and on how the HE quality agency will involve MoES in such situations, including in the possible outcome of a public HEI not taking appropriate remedial action.

2 GENERAL APPROACH TO RECOMMENDATIONS FOR CONTENT OF MANUALS FOR REVIEW OF HEIS

In their earlier Technical Paper 'Assessment of Provisional System of Inspections of Higher Education Institutions and Recommendations for the Future Inspection System' (PACA June 2012), the experts have already indicated their preference for language based on the term 'HE review for quality enhancement and assurance' rather than the term 'HE inspection'. Although the term 'inspection' is used in the PACA specification for the current paper and in recent Albanian Government documentation, the experts will continue to use 'review for quality enhancement and assurance' as far as possible throughout this Paper, and to recommend the use of this term in subsequent Albanian Government documentation.

The experts have been asked to make detailed recommendations on four specific aspects for inclusion in manuals for HE review for quality enhancement and assurance: (a) the criteria for Launching reviews (b) procedures for the review process, including all aspects of the review process from decisions on carrying out a review to the final review report (c) review standards, i.e. criteria by which HEIs should be judged, and how the criteria in question should be measured/assessed (d) the format/structure of review reports. Each of these aspects will be covered in a separate section in the Technical Paper. The experts have also been asked to provide a list of review manuals needed. In a sense, a large, single review manual could be produced, with four sections corresponding to the four aspects identified above. However, this document would probably be too large. The most appropriate approach would seem to involve four separate manuals, one for each of the four aspects, although the manual on procedures will certainly need to be sub-divided formally into a number of significant sub-sections (see below). This would give the following list of manuals:-

- (i) A Manual on Criteria for Launching Reviews
- (ii) A Manual on Procedures for All Aspects of the Review Process, including sub-sections on
 (a) The HEI's Self-Evaluation Document (b) 'Exceptional Circumstances' Response by the
 HE Quality Agency (c) The Review Team (d) The Review Visits (e) The Reporting Process
- (iii) A Manual on Review Standards
- (iv) A Manual on the Format and Structure of Review Reports

In making detailed recommendations for the content of these manuals, the experts will draw heavily upon the details within the recommendations they have already made on these topics in their earlier Technical Paper 'Assessment of Provisional System of Inspections of Higher Education Institutions and Recommendations for the Future Inspection System' (PACA June 2012). In particular, the June Technical Paper covered 'Criteria for Launching Reviews' in Recommendations 7.1-7.5, 'Procedures for All Aspects of the Review Process' in Recommendations 8.1-8.5, 'Review Standards' in Recommendations 9.1-9.5, and 'Format and Structure of Review Reports' specifically in Recommendation 8.5. The relevant sections of the current Technical Paper will repeat the associated Recommendations from the June Paper, emphasising that the detail within these earlier Recommendations must be addressed in the appropriate Review Manual.

As explained in the earlier Technical Paper 'Assessment of Provisional System of Inspections of Higher Education Institutions and Recommendations for the Future Inspection System', much of the detail proposed by the experts is based on the approaches and documentation of the Quality Assurance Agency for Higher Education (QAA) in the UK, both the QAA's general approaches

UK-wide and the QAA's particular approaches within Scotland (within an overall UK-wide framework, there are some variations in the Scottish-specific approaches) (see PACA June 2012, p. 12). Particular use was made of the Enhancement-led institutional review handbook: Scotland (Second edition) (QAA Scotland 2008) (see PACA June 2012, p.26) and the UK Quality Code for Higher Education (QAA UK 2012) (see PACA June 2012, pp.28-29).

Recommendations in the current Paper will continue to be based on these documents. More specifically, details from the Enhancement-led institutional review handbook: Scotland (Second edition) relate particularly to the recommendations for manual content on criteria for Launching reviews (Recommendations 2.1-2.5), procedures for all aspects of the review process (Recommendations 3.1-3.5), and the format and structure of review reports (Recommendations 5.1-5.5). Details from the UK Quality Code for Higher Education relate particularly to the recommendations for manual content on review standards (especially Recommendations 4.3-4.5).

Although QAA Scotland has produced a Third edition of the Enhancement-led institutional review handbook (QAA Scotland June 2012) since the experts wrote their June Technical paper, the experts do not wish to amend any of their detailed recommendations in the light of this Third edition. None of the amendments in the Third edition are on fundamental principles, and they do not alter the appropriateness of including QAA Scotland approaches as the basis of European 'best practice' recommendations .

In making recommendations on the content of review manuals, the experts see these future manuals as guidance for reviewers in conducting HEI quality reviews, but also as guidance for HEI staff in preparing for, and participating in, these reviews. The experts also wish to emphasise that they have not been asked to provide the actual content of review manuals as such, but rather recommendations on what should be covered in actual content. They envisage that the relevant Albanian stakeholders will subsequently produce the final, full content, based on the experts' recommendations.

Recommendation 1: Consistent with the principles outlined in the experts' earlier Technical Paper 'Assessment of Provisional System of Inspections of Higher Education Institutions and Recommendations for the Future Inspection System' (PACA June 2012), the content of manuals for 'inspection' of Higher Education Institutions (HEIs) should be presented as far as possible as details for a system of Higher Education (HE) review for quality enhancement and assurance. There should be four manuals:

- A Manual on Criteria for Launching Reviews;

- A Manual on Procedures for All Aspects of the Review Process (with formal sub-sections on The HEI's Self-Evaluation Document, 'Exceptional Circumstances' Response by the HE Quality Agency, The Review Team, The Review Visits, and The Reporting Process);

- A Manual on Review Standards;

- A Manual on the Format and Structure of Review Reports.

Recommendations in the current Technical Paper should be considered alongside the related Recommendations 7.1-7.5, 8.1-8.5 and 9.1-9.5 from the June Technical Paper, and seen as consolidation and extension of these earlier Recommendations. In implementing Recommendations on the content of HE review manuals, the approaches and documentation of the Quality Assurance Agency for Higher Education (QAA) in the UK generally, and Scotland specifically, should be seen as particularly helpful exemplars of European 'best practice' approaches.

3 DETAILED RECOMMENDATIONS FOR MANUAL CONTENT ON CRITERIA FOR LAUNCHING REVIEWS

In the earlier Technical Paper 'Assessment of Provisional System of Inspections of Higher Education Institutions and Recommendations for the Future Inspection System' (PACA June 2012), the experts made the following detailed Recommendations on the main criteria for i) launching and ii) conducting HEI inspections:-

Recommendations on the main criteria for i) launching and ii) conducting HEI inspections

(from the June Technical Paper)

Recommendation 7.1: In the immediate future, priority should be given to the national HE quality agency undertaking full quality reviews of all private HEIs, given the concerns which have arisen about the private HE sector.

Recommendation 7.2: Full, regular quality reviews of all HEIs should be undertaken by the national HE quality agency every four years.

Recommendation 7.3: In addition, every HEI should have an annual 'engagement' with the national HE quality agency. This should involve the HEI submitting to the agency an annual report, supplemented by relevant existing internal supporting documentation, covering institutional profile information (such as student numbers at the three cycles, student assessment data and analysis, staff numbers and profiles) and summaries of internal quality assurance activities during the year. An annual meeting should then be arranged by the HE quality agency, when a senior agency official will meet with senior staff from the HEI to discuss the annual report.

Recommendation 7.4: In addition to the cycle of regular reviews, additional quality reviews should be undertaken where specific causes of concern have arisen over an HEI. All relevant stakeholders should be able to raise such causes of concern with the national HE quality agency, including central government, academic staff, students, the general public and the press. Clear mechanisms should be established for stakeholders to raise such concerns, but these should relate to concerns of serious systemic or procedural problems with an HEI, not complaints about individual treatment (for example, systemic failure to follow appropriate assessment procedures, rather than disputes about specific academic judgements within assessment marking). It is possible that the national HE quality agency itself may initiate such additional reviews as a result of concerns arising after its annual meeting with the HEI. The agency should develop protocols which involve an initial inquiry stage into concerns raised, conducted by agency staff, followed by a full investigative review, involving a normal review team, if deemed appropriate. The review team should decide whether to focus exclusively on the issues of concern or widen the review to other aspects of the HEI's provision.

Recommendation 7.5: When conducting regular, full reviews, review teams should cover all aspects of provision sufficiently to assure themselves that quality standards are being sustained and enhanced. However, depending on evidence from the HEI's self-evaluations and on evidence emerging in the early stages of a review, the review team should decide if it is necessary to give more intensive focus to particular aspects of provision, where initial evidence for quality enhancement and assurance may be less convincing.'

(PACA June 2012, pp.7-8)

It follows from the above that a Manual on Criteria for Launching Reviews must provide detail on the following aspects:-

Firstly, the overall framework for the national HE quality agency's work on reviews must be set out. This will involve indicating the distinction between full, regular quality reviews and additional 'specific cause of concern' reviews. The framework will confirm that a national timetable should involve all HEIs experiencing a full review every four years, but with immediate priority given to full review of all private HEIs. The framework will also confirm that the national HE quality agency will have an annual 'engagement' with every HEI. (following from June Recommendations 7.2, 7.4, 7.1 and 7.3.)

Secondly, the nature of the annual 'engagement' between the national HE quality agency and each HEI must be detailed. This will involve clear guidelines on the annual report which each HEI must submit to the agency. It will also involve clarifying the nature of the annual meeting between a senior agency official and senior staff from the HEI, including the possible outcomes of these meetings. (following from June Recommendation 7.3.)

Thirdly, the protocols for additional 'specific cause of concern' reviews must be fully developed. The nature and scope of what may constitute a 'specific cause of concern' needs to be established. This involves clarifying why the HE quality agency might wish to initiate such reviews after its annual meeting with an HEI. It also involves clarifying the mechanisms for other stakeholders to raise concerns which may then lead to a 'specific cause of concern' review, and clarifying the criteria to be used by the national agency in deciding whether or not such concerns merit a review being undertaken. It will also be necessary to specify how the national agency will progress such inquiries/reviews. (following from June Recommendation 7.4.)

Fourthly, approaches need to be detailed on the depth of focus to be given to various aspects of an HEI's provision when conducting regular, full reviews. While reviewers should cover all aspects of provision sufficiently to assure themselves that appropriate quality standards are being sustained and enhanced, guidelines will be required on the type of evidence from the early stages of a review (including the initial HEI's self-evaluation document) which should lead reviewers to give more intensive focus to particular aspects of an HEI's provision. (following June Recommendation 7.5.)

Therefore, the following Recommendations for manual content are now required to consolidate/expand upon the original June Recommendations relating to the criteria for Launching Reviews (as mentioned in Section 2 earlier, these Recommendations can be related particularly to the QAA Scotland Enhancement-led institutional review handbook: Scotland [Second edition], QAA Scotland 2008) :-

Recommendation 2.1: The Manual on Criteria for Launching Reviews should set a clear framework for the overall national review of HE for quality enhancement and assurance, distinguishing between the full, regular reviews which all HEIs will experience every four years, additional reviews which may be conducted for any HEI giving 'specific cause of concern', and the annual 'engagement' which each HEI will have with the national HE quality agency. The framework should also confirm that the national timetable for full, regular reviews will give immediate priority to the full review of all private HEIs.

Recommendation 2.2: The Manual on Criteria for Launching Reviews should provide full details on the nature of the annual 'engagement' between the national HE quality agency and each HEI. These details should include:

- (a) Full specifications on the annual report which each HEI will submit to the agency. These guidelines should include specifying a standard format for providing institutional profile information on student numbers at the three cycles, student assessment data and analysis, and staff numbers and profiles. The guidelines should also indicate the level of detail required in summaries of internal quality assurance activities during the year. A national timetable should be provided indicating when reports are required, and establishing an appropriate time-frame between receipt of the report and the annual meeting (see below).
- (b) Full guidelines on the annual meeting to be held between the HE quality agency and the HEI. The guidelines should clarify the level of seniority of the agency official who will represent the agency, and indicate the type of HEI representation expected at the meeting (based on a small number of senior staff, including the head of the HEI). Exemplar agenda for the meeting should be provided. The nature of the record of meeting to be provided by the agency, including the format for a note of any action points for the HEI, should be clarified, in particular if the meeting gives rise to a 'specific cause of concern' for the agency (see below).

Recommendation 2.3: The Manual on Criteria for Launching Reviews should provide full protocols on the launching and conducting of additional quality reviews outside the cycle of regular reviews, where specific causes of concern have arisen over an HEI. These protocols should:

- (a) Illustrate the type of evidence which may lead to the HE quality agency initiating a 'specific cause of concern' review after its annual 'engagement' with an HEI.
- (b) Distinguish between complaints about individual treatment (e.g., an individual's dispute about specific academic judgements within assessment marking) and concerns over serious systemic or procedural problems with an HEI (e.g., an HEI's systemic failure to follow appropriate assessment procedures), and outline a communication strategy to ensure that other stakeholders appreciate this distinction.
- (c) Specify how other stakeholders (which could include central government, academic staff, students, the general public and the press) can formally raise a 'cause of concern', including the format for any such communication to the HE quality agency, and the protocols for its initial receipt by the agency, including timeframes for acknowledgement and response, and any appropriate position on confidentiality to be taken by the agency.
- (d) Clarify the nature of the initial inquiry into a 'specific cause of concern' by HE quality agency staff, and how findings will then be reported (including any 'action points' for the HEI) where it is judged unnecessary to proceed to a full investigative review after an initial inquiry stage.
- (e) State criteria for an HE quality agency decision to move from the initial inquiry stage on 'a specific cause of concern' to a full investigative review by a normal review team, and provide guidelines for the review team's decision-making on how far it should then

focus exclusively on the issues of concern, or widen the review to other aspects of the HEI's provision. Associated guidelines will also be required on how a review team is to report, if the review does not widen sufficiently to enable the standard review report format to be used (see Recommendations 5.1-5.4 below for the standard report format).

Recommendation 2.4: The Manual on Criteria for Launching Reviews should provide guidance on the depth of focus to be given by reviewers to the various aspects of an HEI's provision when conducting regular, full reviews. While reviewers should cover all aspects of provision sufficiently to assure themselves that appropriate quality standards are being sustained and enhanced, it may be necessary for a review team to give more intensive focus to particular aspects of provision, where initial evidence for quality enhancement and assurance may be less convincing. Guidance should illustrate what may make initial evidence unconvincing, principally the omission of key information from the HEI's self-evaluation document, or the highlighting of a particular issue by the HEI within its own self-evaluation. Recommendation 3.1 below details the five main sections to be covered in the self-evaluation document, and the content to be included within each section. The review team should make systematic use of Recommendation 3.1 as a check-list for identifying omissions of key information or suggestions of 'negative concerns' in the HEI's own self-evaluation.

4 DETAILED RECOMMENDATIONS FOR MANUAL CONTENT ON PROCEDURES FOR ALL ASPECTS OF THE REVIEW PROCESS

In the earlier Technical Paper 'Assessment of Provisional System of Inspections of Higher Education Institutions and Recommendations for the Future Inspection System' (PACA June 2012), the experts made the following Recommendations on the main content of HEI inspection procedures, from decisions to launch an inspection to the final inspection report:-

'Recommendations on the main content of HEI inspection procedures, from decisions to launch an inspection to the final inspection report

(from the June Technical Paper)

Recommendation 8.1: Prior to the institutional review for quality enhancement and assurance, the HEI should be asked to provide the national HE quality agency with a self-evaluation document (in Scotland, this document is known as the Reflective Analysis [RA]). This self-evaluation document should contain: (1) An Introductory section, including an institutional profile (covering similar information to that provided in the HEI's annual report to the agency) ; key changes and developments within the HEI; a brief explanation of the methods used to produce the selfevaluation document, including how staff and students have been involved (2) A Management of the student learning experience section, including the HEI's effectiveness in managing student information, engaging and supporting students, managing the learning environment, supporting and developing staff to promote effective student learning (3) An Institution-led monitoring and review of quality and standards section, including an explanation of how the HEI's institutionalled monitoring and review makes use of external reference points; manages information, including public information about quality and standards, to support monitoring and review; effectively manages assessment to set and maintain academic standards; and links monitoring and review to enhancement (4) A Strategic approach to quality enhancement section, including key features of the HEI's strategic approach to quality enhancement; the effectiveness of the HEI's use of external reference points to national and international best practice in quality enhancement; and the effectiveness of the HEI's internal dissemination of good practice identified within its strategic approach to quality enhancement (5) <u>A Conclusion section</u>, giving the HEI's summary of its effectiveness in managing the student learning experience, monitoring and reviewing the quality and academic standards of its awards, and implementing a strategic approach to quality enhancement.

Recommendation 8.2: In exceptional circumstances, where a private HEI's self-evaluation document suggests overwhelming evidence that the HEI cannot possibly achieve a positive outcome from a full review, the national HE quality agency may contact the MoES immediately with a view to suspension or removal of licence, without proceeding with a full review process.

Recommendation 8.3: A Review Team for each HEI quality review should be identified by the national HE quality agency, drawn from a pool of nominated reviewers. This team should comprise: senior Albanian academic peer reviewers (typically c.3), with all Albanian HEIs being invited to nominate senior academics who meet appropriate criteria; an international senior academics meeting appropriate criteria; a student reviewer from another HEI, with all Albanian student representative bodies being asked to nominate potential reviewers. The team should have a coordinating reviewer, again drawn from HEI nominations, who may be a senior academic administrator or a senior academic. The team should also be supported by a senior member of the permanent staff of the national quality agency.

Recommendation 8.4: The review should be based on a two-part visit. A part one visit should last two days, and involve a programme of activities, including meetings with a group of senior staff, a group of student representatives, and a wider group of staff involved in quality enhancement and review activity. The part one visit should be used by the team to identify key themes to be explored in the part two visit and share these with the HEI. It should also enable the team to specify particular documentation which it wishes the HEI to provide for review at the part two visit, and indicate the particular types of additional staff and student groups it wishes to meet on the part two visit. The Part two visit should be four weeks after the part one visit, and last between three and five days. On the final day of the part two visit, the team should agree its conclusions and compile an outline draft report.

Recommendation 8.5: Within a week of the part-two review visit, the senior official from the national HE quality agency supporting the review should send a formal letter to the HEI summarising the provisional conclusions of the review. A draft of the full report, and a shorter summary of this, should be sent to the HEI within eight weeks of the part two visit, and agreed versions published on the national HE quality agency's website within twelve weeks. The report should provide a commentary on the effectiveness of the HEI's approach in three broad areas: management of the student learning experience; institution-led monitoring and review of quality and academic standards; strategic approach to quality enhancement. The commentaries should lead to a single overarching judgement expressed as a confidence statement in one of three standard forms: 'confidence' (secure academic standards and a quality student experience are being managed effectively and this is likely to continue); 'limited confidence' (not a judgement of failure but an indication that improvements need to be made in areas which will be specified); 'no confidence' (substantial evidence of serious and fundamental failure to secure appropriate academic standards and quality of educational provision). With a 'confidence' judgement, the HEI should be asked to produce a year-on report for the national HE quality agency, indicating on-going enhancement following the report. With a 'limited confidence' judgement, the HEI should be set an action plan by the national quality agency with a much shorter timescale, and MoES informed of developments. With a 'no confidence' judgement, while the HEI may be given some opportunity for remedial action, the national HE quality agency might move to initiate, or liaise with MoES on, the suspension/removal of licence (in the case of a private HEI), depending on the respective roles of the two institutions in such suspensions/removals.'

(PACA June 2012, pp. 8-10)

It follows from the above that the Manual on Procedures for All Aspects of the Review Process must provide detail on the following aspects:-

Firstly, clear instructions should be given on what HEIs should include within each section of the institution's self-evaluation document. (following from June Recommendation 8.1.)

Secondly, criteria should be established to clarify the type of evidence from a private HEI's selfevaluation document which will make it appropriate for the national HE quality agency to contact the MoES immediately with a view to suspension or removal of licence, without proceeding to a full review process. (following from June Recommendation 8.2.)

Thirdly, the full criteria should be given which the various categories of Review Team members must meet (Albanian senior academic peer reviewers, international senior academic peer reviewers, student reviewers, coordinating reviewers), and the respective roles within review of the coordinating reviewer and supporting senior national quality agency staff member should be clarified. (following from June Recommendation 8.3.)

Fourthly, full exemplar programmes should be provided for the days within the two-part review visits to HEIs. (following from June Recommendation 8.4.)

Fifthly, an overview of the timetable and general nature of review reporting should be given in summary form, but the full guidance on the writing of review reports should be included in the separate Manual on the Format and Structure of Review Reports (following from June Recommendation 8.5, and see also Section 6 and Recommendations 5.1-5.4 in the current Paper.)

Therefore, the following Recommendations for manual content are now required to consolidate/expand upon the original June Recommendations relating to procedures for all aspects of the Review process (as mentioned in Section 2 earlier, these Recommendations can be related particularly to the QAA Scotland Enhancement-led institutional review handbook: Scotland [Second edition], QAA Scotland 2008) :-

Recommendation 3.1: The Manual on Procedures for All Aspects of the Review Process should include a sub-section on the HEI's Self-Evaluation Document. This should provide clear instructions on overall length and style, and on the content which HEIs should include within each section of the institution's Self-Evaluation Document. For example, for individual sections (as numbered in Recommendation 8.1 of PACA's June Technical Paper), these instructions should include:

For (1), <u>An Introductory section</u>: specification of the type of information to be included in an institutional profile; examples of the type of recent changes and developments within an HEI which could be regarded as 'key' in the context of review for quality enhancement and assurance; an indication of the level of detail looked for in describing how the Self-Evaluation Document has been produced, including how staff and students have been involved.

For (2), <u>A Management of the student learning experience section</u>: definitions of the type of student information which needs to be managed effectively in relation to quality enhancement and assurance; examples of the type of activity involved in effectively engaging and supporting students in the learning experience, effectively managing the student learning environment, and effectively providing staff support and development to promote appropriate student learning.

For (3), <u>An Institution-led monitoring and review of quality and standards section</u>: specification of the types of external reference points on quality and standards which could be used in institution-led monitoring and review, and specification of the type of information about quality and standards, including public information, which could be managed to support monitoring and review; illustrations of the aspects of assessment policy and practice which need to be managed effectively to set and maintain academic standards; examples of how monitoring and review can be linked to enhancement of quality and standards.

For (4), <u>A Strategic approach to quality enhancement section</u>: a definition of the level of approach to quality enhancement which can be regarded as 'strategic' for an HEI; specification of relevant external reference points for national and international best practice in quality enhancement, and examples of how an HEI could use these effectively in its own quality enhancement; examples of possible effective internal dissemination of good practice on quality enhancement within an HEI.

For (5), <u>A Conclusion section</u>: guidance on the length of this summary section, and the extent to which it should repeat earlier points or introduces new ones; any indication of whether the HEI should be asked to give an overall self-evaluation against the judgement criteria which will subsequently be used by the review team.

Recommendation 3.2: The Manual on Procedures for All Aspects of the Review Process should include a sub-section clarifying the type of evidence from a private HEI's Self-Evaluation Document which will make it appropriate for the national HE quality agency to contact the Ministry of Education and Science (MoES) immediately with a view to suspending or removing the HEI's licence, without proceeding to a full review process. Such evidence is likely to include:

- (a) Absence of information in the Introductory section establishing that the HEI meets the basic criteria for relevant HEI status (in terms of the cycles of higher education offered, and minimum numbers of faculties, departments and full-time academic staff) as specified in the relevant existing Albanian Government documentation (see Recommendation 4.2 below).
- (b) Consistent failure to demonstrate that there is effective management of an appropriate student learning experience.
- (c) Consistent failure to demonstrate that there is effective institution-led monitoring and review to maintain appropriate academic standards.
- (d) Absence of any strategic approach to quality enhancement at institutional level.
- (e) Compelling, even if indirect, evidence of dishonest illegal activity.

Recommendation 3.3: The Manual on Procedures for All Aspects of the Review Process should include a sub-section detailing criteria for the various categories of Review Team members. In particular, these criteria should comprise:

- (a) For senior Albanian academic peer reviewers (typically 3 per Team): current or recent (within the past three years) wide experience of HE quality assurance and enhancement, preferably including academic management at the institutional level; personal and professional credibility with HEI staff, including heads of institution, other senior managers, and staff currently engaged in learning and teaching; knowledge and understanding of the new national HE review system for quality enhancement and assurance, including through undertaking any required training.
- (b) For senior international academic peer reviewers (1 per Team): current or recent (within the past three years) wide experience of internal HE quality assurance and enhancement, preferably including academic management at the institutional level; current or recent (within three years) experience of external review of HEIs in their own country or elsewhere, either as a review team member or through senior involvement with a quality enhancement and assurance agency; international comparative knowledge and understanding of HE quality enhancement and assurance; knowledge and understanding of the new Albanian HE review system for quality enhancement and assurance, by undertaking initial familiarisation reading.
- (c) For student reviewers (1 per Team): current or recent (within the past year) experience of study at an Albanian HEI, with a minimum period of HE study to date of the equivalent of one year's full-time education; experience of representing students' interests at institutional (including Faculty or departmental) level and/or regional/national level; knowledge and understanding of the new national HE review system for quality enhancement and assurance, including through undertaking any required training.
- (d) For the coordinating reviewer: current or recent (within the past three years) wide experience of HE quality assurance and enhancement at institutional management level, either in a relevant senior academic or senior administrative post; wide experience of working with senior committees in HE, preferably with experience as a chair; wide experience of leading teams in the HE context; credibility with HEI staff, including heads of institutions, other senior managers, and staff currently engaged in learning and teaching; knowledge and understanding of the new national HE review system for quality enhancement and assurance, including through undertaking any required training.
- (e) For the supporting member of staff from the national HE quality agency: holding a permanent post with the new national HE quality agency of sufficient seniority to achieve credibility with HE staff, including heads of institutions and other senior managers.

In addition, the Manual on Procedures for All Aspects of the Review Process should clarify the respective roles within the review process of the coordinating reviewer and the supporting senior national quality agency permanent staff member. In particular, the Manual should confirm that, while the coordinating reviewer is no more than 'primus inter pares' in ensuring that the Review Team moves towards collegial and collective decision-making, the senior national quality agency staff member simply services the Team (for example, while the national agency staff member may work on draft Reports, this will only be at the direction of the coordinating reviewer, who in turn will be reflecting the views of the Review Team).

Recommendation 3.4: The Manual on Procedures for All Aspects of the Review Process should include a sub-section detailing the types of activities to be included within the Review visits to HEIs, including full exemplar programmes for typical days. In particular, details should include:

- (a) For the part one visit (lasting two days): The first half day should involve the HEI providing a programme of activities (presentations etc.) to give an overview of its provision and approaches. The rest of day one and most of day two should include a meeting with a group of senior staff, a meeting with student representatives, and a meeting with a wider group of staff who have particular experience of the HEI's internal quality review activity. The later part of day two should involve the Review Team sharing with the HEI themes for the part two visit and establishing a draft programme for that visit, including specifying the particular documentation which the Review Team wishes the HEI to provide for the Team's consideration, and the particular types of staff and student groups which the Team will wish to meet.
- (b) For the part two visit (lasting three to five days, and taking place four weeks after the part one visit): The programme for this visit should give the Review Team opportunities to consider documentation requested from the HEI and relating to themes identified during the part one visit, and opportunities to meet with a wider range of staff and students, again particularly with agendas for meetings related to themes identified during the part one visit. The final day of the part two visit should provide significant time for a private meeting of the Review Team to agree conclusions and compile an outline draft report.

Recommendation 3.5: The Manual on Procedures for All Aspects of the Review Process should include a sub-section providing a summary overview of the timetable and general nature of Review reporting. This will confirm that the senior national HE quality agency official supporting the Review will send a formal letter to the HEI summarising the provisional conclusions of the Review within a week of the part-two visit, followed by a draft of the full report, and a shorter summary of this, within eight weeks of the part-two visit. The Manual should confirm that agreed versions of the full and summary reports will appear on the national HE quality agency's website within twelve weeks. The Manual should specify that HEIs can only seek amendments to draft reports on issues of fact and cannot dispute the reviewers' judgements. However, full guidance on the writing of reports should be provided in the Manual on the Format and Structure of Review Reports (see Recommendations 5.1 to 5.4 below).

5 DETAILED RECOMMENDATIONS FOR CONTENT OF MANUAL ON REVIEW STANDARDS

In the earlier Technical Paper 'Assessment of Provisional System of Inspections of Higher Education Institutions and Recommendations for the Future Inspection System' (PACA June 2012), the experts made the following Recommendations on the main inspection standards, i.e. the criteria by which HEIs are evaluated:-

'Recommendations on the main inspection standards, i.e. the criteria by which HEIs are evaluated

(from the June Technical Paper)

Recommendation 9.1: As detailed through the relevant parts of Recommendations 9.2, 9.3, 9.4 and 9.5, all HEIs must specifically demonstrate that they do not engage in any dishonest illegal activity such as awarding degrees under false pretences to students who have not completed appropriate courses and assessments successfully.

Recommendation 9.2: All HEIs must meet the basic criteria for relevant HEI status in terms of the cycles of higher education offered, and minimum numbers of faculties, departments and full-time academic staff, as specified in existing Albanian Government documentation such as Chapter II of the 2007 Law on Higher Education (Albanian Parliament 2007); Chapters I, II and III of 'State Quality Standards Of Higher Education Institutions (HEI)' (MoES 2011a); and Appendix 2 of 'Procedures And Documentation For The Opening Of A Private Higher Education Institution, Programmes Of Graduate Studies In The First And Second Cycle, Programmes Of Non-Graduate Studies, Of Professional Nature And Also Procedures For Suspension And Revocation Of License' (MoES 2011b).

Recommendation 9.3: All HEIs must set and maintain appropriate academic standards. This must include:

- (a) Ensuring that all programmes of study meet the requirements for the relevant level of the three consecutive cycles of higher education, for example as detailed in existing Albanian Government documentation such as Chapter IV, Articles 26 and 27, of the 2007 Law on Higher Education (Albanian Parliament 2007); Chapter I, especially Standard I, of 'State Quality Standards Of Higher Education Institutions (HEI)' (MoES 2011a); and Appendix 2 of 'Procedures And Documentation For The Opening Of A Private Higher Education Institution, Programmes Of Graduate Studies In The First And Second Cycle, Programmes Of Non-Graduate Studies, Of Professional Nature And Also Procedures For Suspension And Revocation Of License' (MoES 2011b).
- (b) Making available definitive information on the aims, intended learning outcomes and expected learner achievements for all programmes of study
- (c) Having in place effective processes to approve and review the validity and relevance of programmes
- (d) Ensuring there is independent and external participation in the management of academic standards, including appropriate external examiner processes
- (e) Ensuring assessment of students is robust, valid and reliable, and qualifications and credit are awarded on the basis of the achievement of the relevant intended learning outcomes

Recommendation 9.4: All HEIs must assure, and continuously and systematically enhance, the quality of the learning opportunities they provide for students. This must include:

(a) Using student admissions policies and procedures which are clear, fair, and consistently applied

- (b) Implementing appropriate strategies for learning and teaching, including, where appropriate, for flexible and distance learning, and work-based and placement learning
- (c) Providing effective arrangements to support students in their learning, including careers education, information, advice and guidance, and appropriately meeting the requirements of disabled students
- (d) Ensuring students are appropriately and fully engaged in quality assurance and enhancement processes
- (e) Developing assessment practice which promotes effective student learning, including providing appropriate and timely feedback to students on assessed work in a way which facilitates improvement
- (f) Giving external examiners opportunities to provide comment and recommendations on the continuous innovation and enhancement of assessment practices and their impact on the quality of learning opportunities provided to students
- (g) Regularly reviewing all assessment procedures and regulations to ensure that they remain fit for purpose
- (h) Ensuring that the periodic formal approval and review of programmes is complemented by on-going evaluation of the effectiveness of programme curriculum and assessment in enabling students to achieve appropriate intended learning outcomes
- (i) Providing fair, effective and timely procedures for handling students' complaints and academic appeals

Recommendation 9.5: All HEIs must provide public information for various audiences about the learning opportunities they offer that is fit for purpose (full and sufficient), accessible and trustworthy. This information must include:

- (a) Factual details on the institution's academic organisational, leadership and management structure; student numbers (in different subjects and at different levels); staff details (including numbers and qualifications); summary statistics of student programme completions and qualifications awarded
- (b) A description of the institution's mission, values and overall strategy
- (c) A description of the process for student application and admission
- (d) Sufficient details for prospective students to enable them to make informed selections of programmes based on an understanding of the institution's academic environment and of the support which it will make available to students
- (e) Full details of programmes of study made available to current students at the start of their programme and throughout their studies
- (f) Clear statements of what the institution expects of current students, and what current students can expect of the institution

(g) When a student leaves their programme of study, a detailed record of their studies, which gives full evidence for others, such as future employers or other educational institutions, of the student's achievements on their programme'

(PACA June 2012, pp.10-12)

It follows from the above that the Manual on Review Standards must provide detail on the following aspects:-

Firstly, full examples should be provided of the types of activities which constitute dishonest illegal activity by an HEI. (following from June Recommendation 9.1.)

Secondly, detailed cross-references should be given to the relevant parts of other Albanian Government documentation which provide the basic criteria for relevant HEI status. (following from June Recommendation 9.2.)

Thirdly, full statements should be provided on the academic standards which HEIs must set and maintain. (following from June Recommendation 9.3.)

Fourthly, full statements should be provided on how HEIs must assure, and continuously and systematically enhance, the quality of learning opportunities provided for students. (following from June Recommendation 9.4.)

Fifthly, full guidance should be provided on the types of public information which HEIs must provide on the learning opportunities they offer, if this information is to be fit for purpose (full and sufficient), accessible and trustworthy. (following from June Recommendation 9.5.)

Therefore, the following Recommendations for manual content are now required to consolidate/expand upon the original June Recommendations relating to Review standards, i.e. the criteria by which HEIs are evaluated (as mentioned in Section 2 earlier, particularly Recommendations 4.3-4.5 can be related to the QAA UK Quality Code for Higher Education, QAA UK 2012):-

Recommendation 4.1: The Manual on Review Standards should provide details of the types of 'dishonest illegal activity' which would require the national HE quality agency to refer the HEI to the relevant law enforcement agencies, if evidence of such activity emerged during the Review process. Such activity will include 'academic irregularity' (e.g. awarding degrees under false pretences to students who have not completed appropriate courses and assessments successfully), as well as other illegal activity such as 'financial irregularity'. The Manual should include any specific reference to 'non-education' Albanian laws which relevant law enforcement agencies may view as useful for HE quality agency staff to have knowledge of. The Manual should also make clear exactly how the HE quality agency will contact other agencies (including law enforcement as appropriate) and how, if at all, the agency will be involved in subsequent developments following reference to law enforcement agencies.

Recommendation 4.2: The Manual on Review Standards should provide detailed crossreferences to the existing Albanian Government documentation which specifies the basic criteria for relevant HEI status in terms of the cycles of higher education offered, and minimum numbers of faculties, departments and full-time academic staff. This documentation recently included Chapter II of the 2007 Law on Higher Education (Albanian Parliament 2007); Chapters I, II and III of 'State Quality Standards Of Higher Education Institutions (HEI) (MoES 2011a); and Appendix 2 of 'Procedures And Documentation For The Opening Of A Private Higher Education Institution, Programmes Of Graduate Studies In The First And Second Cycle, Programmes Of Non-Graduate Studies, Of Professional Nature And Also Procedures For Suspension And Revocation Of License' (MoES 2011b). Documentation may also include equivalent and relevant sections of 2012 versions of the 'State Quality Standards' (PAAHE 2012 abcd) only made available to the experts after the current Technical Paper was drafted. The Manual should also provide summaries and extracts of the relevant sections of this documentation.

Recommendation 4.3: The Manual on Review Standards should provide full statements on the academic standards which HEIs must set and maintain. These statements should include full details on:

- (a) The requirements for the relevant levels of the three consecutive cycles of higher education, including detailed cross-references to existing Albanian Government documentation which provides detail on these. The content of this documentation is the same as specified under Recommendation 4.2 above. Summaries and extracts of the relevant sections of this documentation should also be provided in the Manual.
- (b) The format, with associated guidelines and exemplars, for how HEIs should present aims, intended learning outcomes and expected learner achievements for programmes of study.
- (c) The criteria to be met if processes to approve and review the validity and relevance of programmes of study are to be judged as effective, with associated underlying definitions of programme validity and relevance.
- (d) Explanations, with examples, of what constitutes appropriate independent and external participation in the management of academic standards, including for external examiner processes in particular.
- (e) Definitions of what constitutes robust, valid and reliable student assessment, and examples of how institutions ensure such approaches to assessment, including how the award of qualifications and credit is based on the achievement of relevant intended learning outcomes.

Recommendation 4.4: The Manual on Review Standards should provide full statements on how HEIs must assure, and continuously and systematically enhance, the quality of learning opportunities provided for students. These statements should include full details on:

- (a) Explanations, with examples, of what makes student admissions policies and procedures clear, fair, and consistently applied.
- (b) Minimum requirements if strategies for learning and teaching are to be judged appropriate, including specifically for flexible and distance learning, and for work-based and placement learning. Additionally, exemplars of relevant best practice in

learning and teaching strategies should be provided, which will demonstrate possible approaches for continuous and systematic enhancement.

- (c) Criteria for effective arrangements to support students in their learning, including specifically arrangements for careers education, information, advice and guidance, and for appropriately meeting the requirements of disabled students.
- (d) Explanations, with examples, of how students can be appropriately and fully engaged in quality assurance and enhancement processes.
- (e) Explanations, with examples, of how assessment practice can promote effective student learning. Minimum requirements should be specified concerning what leval and content of feedback to students on assessed work is to be judged as appropriate, timely, and facilitating improvement. Additionally, exemplars of relevant best practice in assessment and feedback to students should be provided, which will illustrate how assessment practices can be enhanced.
- (f) Explanations, with examples, of how external examiners can be given opportunities to provide comment and recommendations on the continuous innovation and enhancement of assessment practices, and on their impact on the quality of learning opportunities provided to students.
- (g) Definition of 'fit for purpose' in relation to assessment procedures and regulations, and explanations, with examples, of how these procedures and regulations should be regularly reviewed by the HEI to ensure they remain 'fit for purpose'. The definition and explanations should emphasise the importance of: appropriate and clear statements on the role of assessment panels and boards of examiners (including membership, procedures, powers and accountability); appropriate and clear rules on progressing from one stage of a study programme to another , and on qualifying for an overall academic award; consistency across the institution in recording student marks and providing clear information on these to students; effective institution-wide systems for monitoring and reviewing assessment performance, including analysing trends in student results.
- (h) Criteria for effectiveness of programme curriculum and assessment in enabling students to achieve appropriate intended learning outcomes. Explanations should be provided, with examples, of how an HEI should conduct on-going evaluation of this effectiveness, and ensure that this evaluation complements periodic formal approval and review of programmes.
- (i) Explanations, with examples, of how HEIs should provide procedures for handling students' complaints and academic appeals which are to be judged fair, effective and timely.

Recommendation 4.5: The Manual on Review Standards should give full guidance on the types of public information which HEIs are to provide if this information is to be fit for purpose (full and sufficient), accessible and trustworthy. This guidance must include full details on:

(a) Definitions of what constitutes 'fit for purpose (full and sufficient), accessible and trustworthy' in relation to public information provided by organisations such as HEIs. The definitions should emphasise the importance of the following features of the public information provided by HEIs: to be fit for purpose (full and sufficient), information

must be current and comprehensive enough to meet the requirements of a diverse audience, including potential students, current students, potential employers of graduates, public authorities, the wider public, and interested members of the international community; to be accessible, information must be transparent, and easily available and retrievable, including meeting the access requirements of a diverse audience; to be trustworthy, information must be accurate on individual detail, and overall give a fair reflection of what the HEI has to offer.

- (b) The format, with necessary information specified, for HEIs to present factual details on the institution's academic organisational, leadership and management structure; student numbers (in different subjects and at different levels); staff details (including numbers and qualifications); summary statistics of student programme completions and qualifications awarded.
- (c) Explanations, with examples, of how HEIs can describe their institution's mission, values and overall strategy.
- (d) Specification of what HEIs should include in a description of the process for student application and admission.
- (e) Criteria for the details to be provided by HEIs for prospective students, which will enable these details to be judged sufficient for prospective students to make informed selections of programmes based on an understanding of the institution's academic environment and of the support which it will make available to students.
- (f) Specification of what HEIs should include in full details of programmes of study to be made available to current students at the start of their programme and throughout their studies.
- (g) Criteria for 'clear' statements by HEIs of what the institution expects of current students, and what current students can expect of the institution.
- (h) Specification of the format and content for the detailed record of their studies to be issued by HEIs to students when they leave their programmes of study, so that this provides full evidence of students' achievements on their programme for others, such as future employers or other educational institutions.

6 DETAILED RECOMMENDATIONS FOR CONTENT OF MANUAL ON THE FORMAT AND STRUCTURE OF REVIEW REPORTS

As already indicated in Section 4, p.22 above, Recommendation 8.5 of the earlier Technical Paper 'Assessment of Provisional System of Inspections of Higher Education Institutions and Recommendations for the Future Inspection System' (PACA June 2012) specified key features of the HEI quality review reporting system and the reports themselves. It seems unnecessary to repeat June Recommendation 8.5 here, but reference should be made to the full version of this Recommendation which appears earlier on p.22 of the current Paper.

It follows from June Recommendation 8.5 that the Manual on the Format and Structure of Review Reports must provide detail on the following aspects:-

Firstly, full definitions should be provided of the three overarching judgements to be reached in the Review Reports: confidence; limited confidence; no confidence.

Secondly, full guidance should be given on how commentaries are to be provided in the full Review Report on: the management of the student learning experience; institution-led monitoring and review of quality and academic standards; strategic approach to quality enhancement.

Thirdly, clear explanations should be provided on the differing levels of detail to be given in the full Review Report, the shorter summary Report and the initial Report letter sent by the national HE quality agency to an HEI.

Fourthly, full guidance should be given on how the following will be presented in the full Review Report, as required: the request for an HEI's year-on report for the national HE quality agency, following a 'confidence' Report; the action plan set for an HEI by the national agency, following a 'limited confidence' Report; the consequences of a 'no confidence' Report.

(following from June Recommendation 8.5 for all these aspects.)

Therefore, the following Recommendations for manual content are now required to consolidate/ expand upon the original June Recommendations relating to the format and structure of Review Reports (as mentioned in Section 2 earlier, these Recommendations can be related particularly to the QAA Scotland Enhancement-led institutional review handbook: Scotland [Second edition], QAA Scotland 2008):-

Recommendation 5.1: The Manual on The Format and Structure of Review Reports should provide full definitions of the following three standard types of overall judgement on an HEI's provision which may be reached in the Review Report, namely.

- (a) A judgement of 'confidence' in the Higher Education Institution should be reached where the Review Team finds the HEI is managing the security of academic standards and the quality of the student learning experience effectively and this is likely to continue in the future, including the HEI taking appropriate steps to enhance the quality of the student learning experience continuously.
- (b) A judgement of 'limited confidence' judgement should be used where the Review Team finds evidence there are substantial limitations to the HEI's current capacity to manage effectively the security of academic standards and/or the effectiveness of the student learning experience , or such limitations are likely to emerge in the future. In making this judgement, the Review Team will indicate clearly the areas of concern where improvements need to be made.
- (c) A 'no confidence' judgement should be used where the Review Team finds there are serious and fundamental weaknesses in the HEI's capacity to secure the academic standards of its awards and/or to maintain an appropriate quality of educational provision. In making this judgement, the Review Team will indicate clearly the specific areas of serious and fundamental weakness.

Recommendation 5.2: The Manual on The Format and Structure of Review Reports should provide full guidance on how commentaries are to be made in the full Review Report on the management of the student learning experience, institution-led monitoring and review of quality and academic standards, and strategic approach to quality enhancement. Commentaries

should certainly include the following details, but may also include reference to any other relevant specific aspects of the Review Standards detailed in Recommendations 4.1-4.5 above:

- (a) On the management of the student learning experience, the Report should comment on the effectiveness of the HEI's approach to: managing information about its student population; managing the learning environment; engaging and supporting students in their learning; promoting equality of opportunity and effective learning for all of its students; promoting the development of graduate attributes, including those relating to employability, in all of its students; supporting and developing staff to promote effective learning for their students.
- (b) On institution-led monitoring and review of quality and academic standards, the Report should comment on the effectiveness of the HEI's approach to: self-evaluation, including the use made of external reference points; the management of information to inform the operation and evaluation of its monitoring and review activity; setting and maintaining academic standards, including the management of assessment; managing public information about quality and academic standards, including the linkage with the institution's monitoring and review arrangements; linking of the institution's monitoring and review processes to its enhancement arrangements.
- (c) On strategic approach to quality enhancement, the Report should comment on the effectiveness of the HEI's implementation of: its strategies and policies for promoting quality enhancement across the institution; its use of external reference points, including national and international practice, in the institution's approach to quality enhancement; its identification, dissemination and implementation of good practice in the context of the institution's strategic approach to enhancement.

Recommendation 5.3: The Manual on The Format and Structure of Review Reports should provide clear explanations on the differing levels of detail provided in the full Review Report, the shorter summary Report and the initial Report letter sent by the national HE quality agency to an HEI.

- (a) As discussed under Recommendations 5.1 and 5.2 above, the full Review Report should provide full commentaries on each of the three broad areas: management of the student learning experience; institution-led monitoring and review of quality and academic standards; strategic approach to quality enhancement. These commentaries should cover the relevant areas in sufficient detail to inform fully the staff of the HEI, the wider HE community, officials from the national HE quality agency, and officials from central Government. The commentaries should be followed by the overall judgement on the HEI's provision.
- (b) The summary Report should set out the overall judgement in full, but the summary Report's presentation of the material covered in the full Report's commentaries should be briefer and written for a wider informed lay audience, rather than the more specialist audience envisaged for the full Report. Given the less specialist target audience, the summary Report's presentation of the full overall judgment may also be supplemented by any necessary brief explanatory text.

(c) The initial Report letter will simply summarise the provisional overall judgement reached by the Review Team, together with a summary of 'key themes' to have emerged during the Review.

Recommendation 5.4: The Manual on The Format and Structure of Review Reports should provide clear guidance on how the full Report should present the various follow-up actions which may be required after a Review.

- (a) For a 'confidence' judgement, this will involve specifying the format for the year-on report to be made by the HEI to the national HE quality agency, with this report including an indication by the HEI of its on-going enhancement activity following the Report, in particular activity relating to any specific themes highlighted in the Report.
- (b) For a 'limited confidence' judgement, this will involve clarifying how the HEI will specifically demonstrate that it has met the requirements of the action plan set by the national HE quality agency as part of the Review Report. Clarification should also be provided on how the quality agency will keep MoES informed of developments with 'limited confidence' HEIs.
- (c) For a 'no confidence' judgement for a private HEI, this will involve indicating any potential circumstances in which an HEI may be given opportunity for remedial action, and the forms which such remedial action may take, as an alternative to immediate moves by the HE quality agency on the suspension/removal of the HEI's licence. The protocols on the respective roles of the HE quality agency and the MoES on such suspensions/removals of licences should be clarified. For a 'no confidence' judgement for a public HEI, there should be clarification on the nature and timeframes for remedial action by the HEI, and on how the HE quality agency will involve MoES in such situations, including in the possible outcome of a public HEI not taking appropriate remedial action.

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