

# **Risk-based quality assurance in higher education**

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## Introduction

Although most regulators profess to using 'risk' informally, at least as a way of utilising their scarce resources to best effect, a highly formalised risk-based regulatory system is ill-suited to higher education. It tends to result in a very intensive process of data collection, more centralised and out-of-touch decision making within the regulator, and an approach based on synoptic legibility to the regulatory centre which is misplaced.

This synoptic legibility at the centre is an approach that is ontologically suspect (social processes are too messy and unpredictable for this) and epistemologically doubtful (we can never get enough data to predict the future that precisely). Even with all these tools and data, regulators remain unclear about predicting quite where risk is likely to crystallise.

The very formalised risk-based approach to external quality assurance in higher education (as has been practised by Tertiary Quality and Standards Agency [TEQSA], in Australia) also tends to alienate institutions by not living up to its claimed objective of de-escalating the demands on the most experienced institutions. Even 'moderate' interpretations of risk-based quality assurance (as found in the approach by the Quality Assurance Agency in England, using institutional 'track records' and compliance maturity as proxies for risk) underplay the risks that can emanate from well established, large and growing organisations. As these bodies become more structurally differentiated, managerial oversight tends to be weakened and inefficient as we saw with new financial instruments, such as collatorised debt obligations, in the recent Global Financial Crisis, which escaped managerial understanding never mind control.

In a higher education sector in England that is increasingly characterised by uncertainty and disruption, conventional planning and predictive instruments within organisations and regulators become less useful.

## Alternatives

Rather, higher education regulators should recognise that external quality assurance (and quality enhancement) is best secured at local and departmental level – where course teams act, and should be encouraged to act, collegially. Quality agencies and institutional managers should focus on ensuring that such local processes are effective and accountable. The National Student Survey (NSS) is a useful instrument here for producers, although intended primarily for consumers. Its competition and gradings help to spur course and departmental teams into improving quality.

## The digital revolution

The digital revolution in higher education, including the arrival of Big Data, will also act as a major incentive to course-based, departmental quality enhancement and raised standards. These transformations in learning processes are making such processes much more transparent and accountable than ever before.

The rather closed and secretive world of the university classroom with the expert professor as performer and craftsperson, thus justifying the notion of the importance of academic governance in universities – will slowly give away – outside the elite universities, at least. Properly accountable and transparent collegiality at local level is the way forward for risk reduction in higher education quality assurance.

Learning processes are increasingly recordable online – they are team produced, and focused on student outcomes rather than evaluations of comparative individual teacher performance (which are too difficult, anyway). The 'fingerprints' of student learning are beginning to be seen all over the classroom scene and available for all to compare.

## Big data and online

Previously we have not had the tools to determine if a class was well taught in a university. Many teachers have never entered the classrooms of their colleagues and many professors teach in isolation from their peers. Recently, encouraged further by the Research Excellence Framework (REF) in the UK, teaching has remained an individual, and for some, a subordinated-to-research matter. As such, classrooms interactions are not recorded. Moreover the rules relating to academic freedom make it difficult to assess a professor's impact.

As a consequence it has always been difficult to say what constitutes good teaching. It makes more sense to focus at the other end, on student learning outcomes, and to measure whether or not students are learning as intended.

In fully online but also blended courses, every keystroke is being recorded. Whereas words can disappear into the ether – living and dying in the moment and context of a class – keystrokes are legible. It becomes more difficult for a professor to claim, like an actor, that each performance, offered live each time, is not replicable and, importantly, comparable. As such, unlike the REF it is argued, it is not capable of being authentically evaluated, or at least it is claimed. Big Data is beginning to change all of this.

The way in which such data from online learning are used for quality improvement at the local level should increasingly become the focus for external quality assurance and institutional managers, not an un-needed diversion into the statistical complexities of risk-based regulation. It is likely, however, that system architectures will gradually change as a consequence. Traditionally, universities tend to consist of subgroups that correspond to the component academic services (courses) on offer. Such systems work



well as long as the courses' fundamental building blocks do not require change. Yet component-based structures are bound to impede the learning and teaching innovations that require people and groups to communicate and work together in the new ways enabled by the digital revolution.

It will be important nevertheless, to recognise that the patterns and correlations that emerge from Big Data sets are properly understood and linked to credible pedagogic theory – that patterns are causal and sustainable. Even more crucially, regulators and managers will need to engage more dialogistically and hermeneutically with staff to understand and learn from the processes emerging from technologically aided learning. Statistical probabilities are no substitute for the real thing and nor is risk-based quality assurance.

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