

Consultation Response

Consultation on the UK Quality Code for HE

Submitted: 13 Dec 2017

The [UK Standing Committee](#) for Quality Assessment [consultation proposing changes to the UK Quality Code for HE](#).

A UKSCQA consultation on approaching the Quality Code's Expectations in a new way. The consultation seeks to ensure that the Code remains the cornerstone for quality in UK higher education, that it protects the public and student interest, and that it maintains the UK's world-leading reputation for quality in higher education.

The proposed changes to the UK Quality Code:

- present an approach that allows the Code to be agile and responsive
- align the Code with ongoing regulatory change and a diversifying UK HE landscape
- place students at the heart of the Code
- reflect sector views about how the Code can best serve a rapidly changing sector.

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Does this proposal provide a coherent framework for quality and standards in UK higher education?

Bournemouth University (BU) welcomes the opportunity for the sector to revisit the UK Quality Code for Higher Education in the context of a reshaped regulatory environment. The proposals for the new Quality Code mark a major shift, through the creation of a much shorter set of expectations and core practices. This attempt at simplicity is appreciated and we recognise the concerns expressed in the consultation document around the accessibility and the clarity of the Quality Code for non-specialist audiences, including students.

The core practices provide flexibility which is potentially helpful for established providers with strong track records. It is proposed to remove the underpinning detail for each core practice except where these are identified as supplementary practices. We are concerned about this in the context of new providers entering the sector. Providers with mature approaches to quality assurance and enhancement may not need this level of detail. However, for new providers, the narrative descriptions accompanying expectations and indicators in the existing Quality Code provide helpful reference points to guide institutional practice and these would be lost. The lack of sector endorsed guidance not only increases the risk of serious issues in less well established institutions but in our view acts as an invisible barrier to entry, because it will not be clear to these providers how they can meet the requirements.

A specific point was raised by our student's union (SUBU) about the risk of dilution of the student voice in institutions, particularly new institutions, because there is less detailed guidance on this. The role of students in informing institutions is a key part of the HE reforms.

A primary purpose of the Teaching Excellence Framework is to motivate and support achievement above the baseline standard. This should therefore not be the role of the UK Quality Code. The proposed core practices include elements that outline baseline requirements, but also approaches that can be regarded as demonstrating excellence. For example, supplementary practices to support enhancement. These supplementary practices should not have any regulatory force.

We cannot form an overall assessment of the coherency of the proposed framework until the relationship between the Quality Code and the regulatory framework overseen by the Office for Students is articulated. For example, it is not clear whether or how the Designated Quality Body (DQB) will assess providers against the content of the Quality Code. The OfS Consultation (p30) highlights the possibility that the DQB will be asked to conduct a form of 'Quality Review' on the basis of the Quality Code. We would strongly oppose any move to reintroduce cyclical reviews for low-risk providers. A cyclical review does not fit with the stated risk-based approach of the OfS. We believe that reviews would be appropriate for providers with NDAPS during their probationary period as part of the suite of

interventions available to the OfS, but this should not be a standard part of the process, particularly given the enhanced reporting and data that will be available to the regulator, including the TEF.

Do the revised Expectations appropriately express the outcomes students and stakeholders should expect from higher education providers?

In general yes and we note the continuity with the overarching structure of the current Quality Code with sections covering quality and standards respectively.

The standards expectation uses the concept of 'sector recognised standards' without showing how these standards will be arrived at, and how they will be agreed and recognised within the sector. Is it intended, for example, that these will be an evolution of the current subject benchmark statements? We note that the subject benchmark statements were co-created with the sector and while it may be appropriate to review these, we do not believe that it is helpful to abandon them.

We believe that to avoid duplication and the risks of inconsistencies, new standards should where appropriate, be based on the frameworks provided by Professional, Statutory and Regulatory Bodies (PSRBs). There are other benefits of using PSRB standards where they do exist, as they will address the standards and requirements for graduate outcomes in those professions. We recognise that this will not be possible in all disciplines where pre-existing and generally applicable standards may be harder to identify.

ARE THE CORE PRACTICES FOR STANDARDS APPROPRIATE AND FLEXIBLE ENOUGH TO:

Serve the needs of all nations in the UK?

We do not see any general barriers that would prevent the core practices being applicable to all nations of the UK. We see continuing value to an element of unification across the UK in higher education regulation despite the divergence in fee regimes and regulatory infrastructures. A common Quality Code would serve to present a cohesive model to non-specialist stakeholders, particularly international students. To further support this intention we would urge the DQB to maintain the UK's involvement with the European Association for Quality Assurance in Higher Education (ENQA) framework and to align the new Quality Code as necessary to the European Standards and Guidelines for Quality Assurance (ESG). This will help maintain the link with the European Higher Education Area with the benefits this has for student mobility. In practice, the Quality Code should indicate how institutions are expected to use the reference points provided at the European level. Part 1 of the ESG outlines a number of specifics for how institutions are to operate their quality assurance mechanisms.

Serve the needs of an increasingly diverse sector?

We believe that is essential that there is a common understanding of what 'standards' mean across the sector. This is linked to our comment under 2 above, that it is important to clarify how standards will be generated and agreed.

Current practice and the language in the core practices section relating to standards suggests that standards will be established by comparing provision across providers. Academic judgement should remain a key part of this process as currently managed through the external examiner mechanisms. Level descriptors are already included within the Framework for Higher Education Qualifications (FHEQ) to inform these judgements combined with standards agreed within a discipline (as discussed in our response to question 2 above). In our view, these provide adequate threshold standards that can be applied across a diverse sector. We see a role for the DQB to maintain and keep under review the FHEQ descriptors, doing so will allow for continuous improvement in standards.

ARE THE CORE PRACTICES FOR QUALITY APPROPRIATE AND FLEXIBLE ENOUGH TO:

Serve the needs of all nations in the UK?

As noted in our response to question 3a, we believe the UK should retain a single Quality Code applicable to all four nations and that the core practices are appropriate and flexible enough for this purpose.

Serve the needs of an increasingly diverse sector?

Many of the terms included within the core practices are subjective and/or relative to the performance of other providers, for example 'high quality', 'sufficient facilities' and 'appropriately qualified and experienced'.

We think it is appropriate that the core practices are subjective, as long as there will be flexibility in how providers are able to meet them and as long as the standards are applied consistently. However, we do not believe that references to the sector as a whole will necessarily support diversity, as it will be hard for newer or smaller providers to know what these standards are and apply them to their own arrangements. As noted above in relation to question 1 and 3b, we believe that these standards should be defined without reference to the performance of the rest of the sector.

On the core practice relating to staff qualifications and experience we would welcome a broad definition of 'experience' which recognises all skills and knowledge that would enhance the learning opportunities of students, including from professional and business environments.

The core practices provide some references to the wider support providers need to put in place as part of a holistic offer to their students. We see this as crucial to the success of students. Universities are making significant investments to enhance learning spaces, the availability of learning technology, pastoral support and the research environment. These investments are often not reflected as direct spend on a specific programme of study but are still valuable to students. These investments are recognised in the core practices regarding facilities and resources and research environments. We recommend strengthening the core practice on high quality research programmes to indicate that research activity be integrated as a central part of the academic experience for all students not just students on research programmes.

DOES THE PROPOSAL TO DEVELOP SUPPLEMENTARY PRACTICES OUTLINED ABOVE:

Serve the needs of all nations in the UK?

Yes – there is no reason why supplementary practices could not be written to apply to all four UK nations. The agreed approach to managing the Quality Code should include a mechanism for agreeing which supplementary practices should be developed and include representation from each nation.

Serve the needs of a diversifying sector?

Supplementary practices will support enhancement, which will support institutions seeking to achieve excellence in the TEF. However, these supplementary practices, while they support enhancement and excellence, should not have any regulatory force.

However, given that the objective of this review is to simplify the approach, we believe that the number of new supplementary practices should be limited. We ask that the Designated Quality Body shows restraint in identifying new supplementary practices and also that it ensures it is absolutely clear that these are guidance documents without regulatory force in England, although other nations may choose to treat them differently.

How should we involve the UK nations, the higher education sector, students and other stakeholders (such as graduate employers) in the future development and management of the Quality Code?

We agree with the UKSCQA's vision for the Quality Code as sector owned and managed in collaboration with the sector. BU would seek to engage actively with future developments as a contribution to this approach.

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