

sparqs' draft response to the consultation on the review of the Quality Code December 2017

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

No.

The proposals for the new Quality Code appear to have been driven by recent regulatory changes in the English HE system, including the role of the Office for Students in facilitating market entry. As such, the proposal ignores the differentiation between quality arrangements in the UK nations. It would be of deep concern if the revised Quality Code sought to impose a set of standards/an approach that only reflected the updated regulatory framework in England, at the expense of the distinctive qualities of the arrangements in Scotland and the other nations. This would serve to undermine the internationally-recognised UK quality brand. One of the strengths of the current Code is that despite the different ways in which the nations opt to structure their quality arrangements, it provides a unifying/overarching vision of the UK HE sector. The changes proposed in the consultation document threaten to weaken this shared vision.

It is concerning that the language used in the expectations and core practices in the proposals suggests a transactional relationship and seems to support the notion that education is a product provided by the institution and "consumed" by the student.

In addition, the inclusion of student engagement and enhancement in only the supplementary practices, combined with the suggestion that "in some UK nations, supplementary practices may form part of the regulatory framework" demonstrates an incoherent framework with an inadequate minimum baseline in the expectations and core practices.

We see tremendous value in the current Code presenting a clear picture of "what higher education providers are required to do, what they can expect of each other, and what the general public can expect of them" and we do not deem it necessary to completely redesign the Code to provide the desired streamlined approach. The proposal represents an oversimplification of the Code which also compromises its clarity and coherence and does not provide clear expectations for stakeholders.

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

No.

The fundamental intentions of the Code, as stated in the review, to protect 'public and student interest' and put 'students at its heart', is not represented throughout the expectations and core practices. The existing Code gives students a clear and explicit description of what they can expect in terms of high quality learning, as well as ensuring there is a role for students in shaping that learning. Both of the proposed expectations relating to quality fall far short of this.

One of the fundamental factors that contributes to 'a high quality academic experience' is indeed the relationship an institution has with its students. Student engagement is intrinsically related to high quality learning where students can comment on, but also shape, their individual learning experiences and the strategic direction of learning. We believe that students working with their institutions are key to shaping student learning and ensuring the very best student experience. The first quality expectation should be changed to embrace this.

We are very concerned to see that in the suggested new format, student engagement is not considered to be an expectation for institutions. In its current form, the existence of the Quality Code's Chapter B5, a dedicated chapter with expectations and indicators, sends a clear message regarding the commitment of the UK HE sector to student engagement in quality. This commitment appears to have been downgraded in the proposed Code, and relegated to a supplementary practice. Even the use of the word 'supplementary' implies that student engagement is to become a voluntary or optional 'add-on' for institutions, and not as we believe, intrinsically linked to the quality of learning and teaching at our institutions. This certainly gives the impression of moving in the opposite direction of travel from the Scottish sector which, with the recent review of our Quality Enhancement Framework, again reasserted its commitment to Student engagement.

In addition, by overlooking student engagement and enhancement, the proposal does not reflect Scotland's (nor the UK sector's) values and practices threatening its use as a universal reference point for HE providers. Not only is student engagement one of the five elements of Scotland's Quality Enhancement Framework (QEF), it is also one of the three underlying principles that underpin quality assurance and enhancement in Scotland, alongside High Quality Learning and Quality Culture. In Scotland's ELIR (Enhancement-led Institutional Review) process student engagement plays a key role: "Since the inception of the enhancement-led approach, it has become established practice that students should be partners in the formulation, operation and evaluation of the institution's approach to enhancement".¹ Student engagement in Scotland has seen a marked development in the years since ELIR was established in 2003, with Scotland being widely recognised as pioneering in regard to students' role as reviewers in external reviews. As part of the ELIR process, great importance is placed on engaging students as members of the external review team, and also as reviewees who engage with, and inform, the self-evaluation process.

Scotland and the rest of the UK is recognised internationally as being at the forefront of student engagement policy and practice. The absence of recognising this key feature of the UK sector in any revised Quality Code poses a significant risk of undermining this longstanding reputation. This is also reflected in international trends with a growing emphasis put on the role of students. Increasingly, student engagement is being incorporated into internal review processes, with student centred learning playing a fundamental role in the quality of learning. The current Quality Code also influences the European Standards and Guidelines (ESGs) and we are concerned the oversimplification demonstrated in the proposal would serve to move away from the wider sector. We feel the proposal undermines the progress that has been made internationally and threatens to significantly damage the reputation of the HE sector in Scotland and the rest of the UK.

The second quality expectation is too narrowly focussed on the admissions system and should rather encompass the whole of the student journey. There needs to be reference to an expectation that universities have a role in supporting students from diverse backgrounds to achieve their individual potential. There is also no reference in the proposal to supporting the achievement for people with "diverse requirements, entitlements and backgrounds". In Chapter B3 of the current Quality Code, we see the expectation to work with staff, students and other stakeholders to "articulate and systematically review and enhance the provision of learning opportunities" with explicit reference to learning and teaching activities providing "every student with an equal and effective opportunity to achieve the intended learning outcomes".

¹ Enhancement-led Institutional Review Handbook, QAA Scotland, April 2017, page 4.

For these reasons, we advise that the updated Quality Code must include an expectation that relates to the fundamental nature of student engagement. It should also capture fully the role of universities in supporting the whole student journey and facilitating all students to achieve their potential.

3. Are the core practices for standards appropriate and flexible enough to:
a. Serve the needs of all nations in the UK?
b. Serve the needs of an increasingly diverse sector?

No.

The ambiguous nature of the core practices and expectations does not make its requirements clear for students or stakeholders. We are concerned that students and stakeholders are not adequately informed on what is meant by “standards beyond the academic threshold” or how those are comparable when it also does not clearly reflect the different qualifications frameworks that are used across the UK.

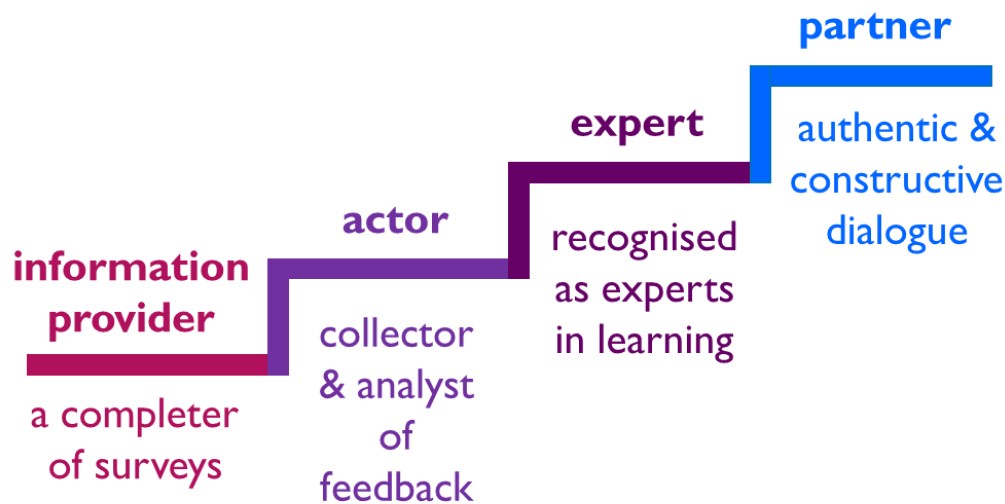
The intention of the proposal to be more accessible for a range of audiences (particularly students) has therefore not been achieved.

4. Are the core practices for quality appropriate and flexible enough to:
a. Serve the needs of all nations in the UK?
b. Serve the needs of an increasingly diverse sector?

No.

The only explicit reference to student engagement is found in core practice 4: (“Views and feedback from students are regularly sought and acted on and providers offer feedback in return”). This language falls far short of the meaningful partnership between students and their institutions which we value and aspire to at Scottish HEIs. It is imperative that core practices relating to student engagement are included in any revised Code (in addition to being incorporated into the expectations).

Educational practice in Scotland and the rest of the UK has long moved on from viewing students as merely providers of feedback (‘information provider’ in diagram below), rendering them passive recipients of their education. Over the last decade, students as active participants in their learning emerged as a topic of increasing importance which is reflected in national and international literature. From this perspective, our students are partners in shaping their educational experience and outcomes, not just for themselves but future generations of students.



The current Code is a document that students and student representatives can use to frame enhancement conversations and subsequent activity. As with the expectations, the core practices related to quality in the proposal do not provide sufficient clarity on key aspects of the student learning experience. There is no reference to quality enhancement, and a lack of clarity on what is meant by 'high quality' or what is meant by 'sufficient'. There is again a focus on admissions with a suggestion that adequate 'matching' will result in successful completion without enough emphasis on support throughout the learner journey. Reference to students achieving their wider potential is strangely only referred to in relation to research programmes and there are no core practices related to equality of opportunity and diversity.

5. Does the proposal to develop supplementary practices outlined above:

- a. Serve the needs of all nations in the UK?**
- b. Serve the needs of a diversifying sector?**

No.

We are deeply concerned by the hierarchical approach which firstly, omits student engagement and enhancement from its core practices and expectations (including them only in the supplementary practices) and secondly, indicates that these areas may be construed as optional. Please refer to our response in Q1.

6. 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?

The development of the Quality Code was a collaborative process which sought participation and input from a range of stakeholders – including students – across the UK. This was undoubtedly positive in fostering a sense of shared ownership and responsibility for the Quality Code across the sector. The fact that these proposals have been published without meaningful engagement with the sector and with such a short period of consultation, is a cause of significant concern. It would be troubling if the sense of shared sector ownership engendered in the development of the existing Code, was lost due to the feeling that the proposals have been imposed on the sector due to

inadequate consultation. The UKSCQA should seek to inform and engage all stakeholders from across the UK in the future development and management of the Quality Code.

6. Please share any additional comments and views you have on these proposals.

About sparqs

Since its creation in 2003, Student Partnerships in Quality Scotland (sparqs) has been the national development agency funded to assist and support students, students' associations and institutions to improve the effectiveness of student engagement in quality assurance and enhancement across Scotland. Our focus is on supporting universities, colleges and students' associations to engage students as equal partners in shaping their learning and contributing to the overall success of learning provision.

We have discussed the proposal at our University Advisory Group and our Academic Representation Coordinators' Network meetings prior to our submission. We have also had discussions with NUS Scotland and NUS UK which has helped form our response.