**Consultation on a review of the Quality Enhancement Framework (QEF)  
Response from sparqs**

**Information about sparqs**

sparqs (student participation in quality Scotland) is an agency funded by the Scottish Funding Council since 2003 to help facilitate student engagement in quality assurance and enhancement in the college and university sectors. We have four strategic aims, which are:  
  
1. To support students to engage at all levels in enhancing their educational experience.  
2. To support the development of practices and activities in institutions and their students’ associations that encourage and support student engagement.  
3. To support student engagement with national sector agencies and policy developments.  
4. To support the development of a culture of student engagement across Scotland.

**How has this response been put together?**

In putting together this response, we have been informed by the views of members of our Steering Committee and University Advisory Group, as well as by the views and expertise of the sparqs team. We also held a consultation event on this topic with student officers, the purpose of which was to help students’ associations to put together their own responses to this consultation, as well as to inform the responses of both sparqs and NUS Scotland.

The main focus of our response is how the quality arrangements could be amended in a manner which facilitates more effective student engagement.

**The changing policy environment**

The political, cultural and policy environment in which this review takes place is different from the environment in 2003 in a number of significant ways, and it continues to change as quality arrangements change in England and Wales, and with the Scottish Parliament election not far away. In putting together this response we have taken note of the following major changes in the policy context, and recommend that these changes are noted during the review:

1. Internationalisation
2. Bologna process
3. Employability and Developing Scotland’s Young Workforce
4. Curriculum for Excellence
5. Learner journey focus and college regionalisation
6. Development of UHI and SRUC as ‘tertiary’ institutions
7. Outcome Agreements
8. Market and competition agenda in the rest of the UK

**The governance of the quality arrangements**

We reaffirm our support for the principle of partnership between the funding body, the universities and their representative bodies, quality assurance agency and the representative body for students that underpins the ownership and development of the quality arrangements in Scotland.

This commitment to students being key partners, alongside others, contributes to the culture of openness and constructive dialogue which is essential for quality enhancement and for genuine student engagement.

We note, however, that whilst student membership of SHEEC and other committees embodies this joint ownership, in recent years we feel perhaps students who sit on SHEEC and the Universities Quality Working Group may not themselves feel responsible for the quality arrangements; rather they see their role on the committee as influencing the institutional members. We would welcome any efforts to strengthen the partnership with students at this level.

We note that James Alexander, then Depute President of NUS Scotland, chaired the Joint Quality Review Group 2006-8, and this is something frequently referenced as symbolic of our commitment to student engagement and student ownership of the quality arrangements. However, it has been some time since this arrangement and we wonder how likely a similar chairing arrangement would be today.

This would be a good time to explore student membership of the various groups. When are students attending in a representative role and who are they representing, e.g. students at their institutions or students nationally or when are they attending as individual members? Where students are representative it is important consider to what extent they are rooted in the community they represent and how they consult with that community to ensure they are able to offer considered views and the interests of the wider group of students. Perhaps the imbalance between student members and institutional members is something we could investigate. It might be important to identify where students have a role in the governance of the arrangements and when their role is developmental.

In developing the QEF it will be important to consider the introduction of Outcome Agreements and what role they play in the quality arrangements. Too close a link between Outcome Agreements and the quality arrangements would threaten the openness and transparency that has been so useful for student engagement and the enhancement agenda. However, the development of Outcome Agreements as a key component of the landscape is now established and there is work to be done on ensuring the arrangements for how these are developed and agreed with the SFC fully engage students. Anecdotally, sparqs is aware that this is an area where student engagement is not as advanced as it could be.

**The pillars of the Quality Enhancement Framework**

The five pillars of the QEF have served the Scottish sector extremely well, helping emphasise an approach that is internationally admired. The elements form the basis of any presentation sparqs makes in its international work and the prominence of student engagement as one of the pillars and running through the other areas is vital to the significant progress Scotland has made in this regard.

However, sometimes when explaining the framework, it can be difficult to explain the way the various pillars fit together. Whereas ELIR, the Enhancement Themes and Institution-led Review are tangible and distinct mechanisms, student engagement is a culture and value which threads throughout all of the other pillars, and Public Information does not fit comfortably into either category as it informs enhancement activity whether that activity is considered part of the framework or not. We consider Public Information in more detail below.

A way to portray the QEF in a more accurate way may be to divide its features into ‘mechanisms’, which would include Enhancement Themes, ELIR and ILR, and umbrella ‘values’ which would include student engagement but also openness, a focus on enhancement, institutional autonomy, learning from international practice, and a peer-led approach. This portrait would be more complex, and may reduce the visibility of student engagement as a feature of the framework. Whilst we raise it here we think any move to change the pillars should be carefully evaluated as risks to prominence of student engagement and current understanding of an established framework are significant.

**Enhancement-led Institutional Review**

We reaffirm our support to the enhancement-led approach and the benefit of ELIR over methodologies used elsewhere in the UK, especially in regard to student engagement and to subsequent contribution this makes to the enhancement activities of universities. The methodology encourages institutions to engage in genuine dialogue with their students and has contributed significantly to a culture where student engagement is considered essential to the continued success and development of an institution.

In relation to student engagement the following are positive practices that we hope future developments would retain.

The role of the student member of the ELIR panel was ground breaking when introduced and we believe practice in relation to this is still exemplary. In other methodologies we have come across internationally and in other parts of the sector, the student reviewer is the member of the panel who does the student engagement, separately from the rest of the panel, which is not an approach we would recommend. Instead, the ELIR methodology rightly includes the student reviewer as a full member of the panel with student eyes, which allows a greater level of student engagement in the entirety of the review. The student member also adds considerable value to the work of the panel, often asking very probing questions which may not be obvious to other members of the panel.

The production of the reflective analysis, in conjunction with the student body is positive practice. Where there is extensive student engagement with the process it leads to extremely valuable reflective discussions with student representatives and effective identification of institutional priorities that are shared between the student body and the institution. Any developments should preserve this collaborative approach between students’ association and institution. Given the value of this approach it might be useful to consider if there are ways to further embed the excellent practice occurring in many institutions in this regard. We would not welcome any move towards a separate student submission, on the basis that working together on a joint document, as is currently the case, is a good example of partnership working at a strategic level. As long as we are confident that such partnership working is taking place, we would recommend retaining the joint Reflective Analysis

As part of ELIR, institutions provide reflections on the ways in which they are engaging students in their own learning and in the management of quality. Also, within ELIR 3, institutions are asked to provide an overview of student feedback collected and analysed. This specific opportunity to reflect on student feedback and engagement and its contribution to the quality arrangements within an institution has contributed directly to a continually improving approach to student engagement. The practice of ELIR reports commenting on effective practice and areas for development directly related to the ways in which an institution engages its students has contributed to practices across Scotland moving forward.

The current format of ELIR reports, especially the recommendations, are very useful for students’ associations to develop shared agendas for work within institutions of particular importance to students. It might be worth exploring how to further use this information in relation to Public (student) Information (see section on Public Information).

The four-year ELIR cycle is a positive timescale for student engagement. Institutional memories within students’ associations are often far shorter than within institutions, owing partly to the high rate of turnover of student officers and engaged students but importantly, for students, even four years is a long time. Four years makes a lot of sense to students many of whom are on four-year programmes. sparqs has worked with students’ associations over this last cycle to encourage them to see the four-year cycle as exactly that. Our ELIR guidance encourages student officers to consider their role each year of the cycle. In considering any changes to the arrangements it is important to consider the negative effect lengthening the cycle could have on student engagement with the review process.

We note recent conversations within the sector about how ELIR could be used more effectively in order to ‘raise the bar’. One area for improvement may be in making greater use of the outcomes of reviews to inform enhancement activity. Students are more likely to engage in a review process with a clearer direction and with an impact visible on the horizon. It would be interesting to look further at the role the newly developed Enhancement Descriptors could play within this area of work.

The new Quality Code has helped clarify and make accessible to students the underlying standards and expectations of the enhancement approach and the new Chapter B5 on student engagement is a welcome addition.

**Enhancement Themes**

The Enhancement Themes have been instrumental in creating a more collaborative culture between universities in Scotland, a culture which is not often evident between universities in the rest of the UK. This collaborative culture, and the activity associated with the Enhancement Themes, have created a way in which students can engage in Learning and Teaching issues at a national level, influencing not just developments at their own institution but a direction of travel across the sector which otherwise would be more difficult.

Looking forward to future developments in the QEF this national direction would be an important element to develop in relation to student engagement. A key feature of effective student engagement as stated in *A Student Engagement Framework for Scotland[[1]](#footnote-1)*, is a ‘Focus on Enhancement and Change’. Students often find it easier to engage where there is a clear outcome - they need to see the effect of their engagement and the impact it has on the student experience. Student officers sometimes find it difficult to engage in some of the work of the Enhancement Themes, owing to a lack of clarity in the outcomes of the activity, particularly at a national level.

The role of students within the governance of the Theme and the role of the student network is an important area to explore. Here, as above, the need for a clearer link to outcomes and impact is significant in moving this work forward.

**Institution-led Review**

There has been a range of developments in practice relating to engagement of students in Institutional-led Review processes. By its very nature these developments have rightly occurred in a way that meets institutional need. For example, the use of student reviewers on institutional review panels is now widespread but the involvement of students in putting together the preliminary materials prior to ILR reviews is less widely developed. In our experience, student engagement in the ILR visits themselves is often limited to a session over lunchtime at which they are asked to identify problems, rather than developing solutions. Student reviewers are also recruited and trained in a variety of different ways at different institutions. In looking forward it would be good to investigate ways in which this good practice could be consolidated across the sector without impinging on institutional autonomy. sparqs is investigating developing guidance to support the engagement of students with ILR processes, including case studies on good practices in different institutions and providing training resources on our website which students’ associations and institutions can use to help student members of review panels prepare for the review. We look forward to exploring this further with QAA Scotland. We welcome the work QAA has done to learn from and share approaches regarding ILR and believe this is an area of activity that should continue.

Whilst there is currently activity, through QAA, to support learning from approaches to ILR across institutions, we are unsure as to what forums are available for sharing learning and collaboration at a subject level. There is significant potential to investigate ways to develop opportunities for this in the future. This would be a particularly rich opportunity for student engagement. Students and staff looking at areas of positive practice and areas for development across a subject area nationally has real potential for powerful enhancement activity that will have a direct impact of a student learning experience. Linking ILR more clearly with national enhancement activity would be an important development for students.

Such an approach may have several advantages. Similar subject areas in different institutions may experience similar problems, may have similar characteristics such as class size and type, and may face similar challenges in implementing enhancements. Collaboration would therefore be of particularly high value. Collaboration at a subject level may help to address the difficulty in engaging students at subject level, and allow students to see different ways in which similar content has been delivered, and compare their experiences with those of students in other institutions. Discipline-focused collaboration would also provide a good opportunity for employers and professional bodies to engage with quality of learning and teaching.

Similarly, many institutions have applied the ILR methodology to their academic support and other areas. These areas frequently affect the student experience to a great extent. All the points made above relate equally to the enhancement of these activities, e.g. the importance of consolidating current practice and the value of creating opportunities for these services the learn from national enhancement activity.

**Public Information**

There has been considerable change in the purpose and prominence of Public Information over the past decade. Public Information can be categorised in a number of ways, and the lack of clarity between intended and actual uses is problematic. It may be useful to redefine the principle of Public Information as part of this review of the QEF.

The primary distinction we would make is between information which is generated as outputs by the quality system (such as ELIR outcome reports, Reflective Analyses, Enhancement Themes case studies) and information gathered from students as an input into the quality process (such as survey data and focus group results). Currently very little use is made of the quality outputs in terms of informing the public about education improvements, but a lot of prominence is given to information gathered from students such as the National Student Survey. In fact, the opposite should be the case; quality outputs contain large amounts of qualitative information which would be useful for prospective students, including programme specifications, information about the student demographics, and information about what the university or department is planning to enhance. On the other hand, NSS data have the advantage of being standardised and comparable, but they are not very useful as information for prospective students.

As much of the Public Information infrastructure is based around the UK sector, and geared towards an admissions market, there may be little scope to make very wide-ranging changes. However we note that there has been significant appetite to make changes to the Key Information Set for Scottish institutions. One very useful model for a new Scottish KIS could be to attempt to standardise and collate the very useful qualitative information produced by quality processes, and present it in one place where it can be useful for prospective students.

**The Learner Journey**

There is increasing focus on different learner journeys; an increase in the prominence of articulation routes between college and university; the introduction of joint 2+2 degrees between colleges and universities; school level provision in colleges; degree level apprenticeships, etc. The focus of quality arrangements being on the provision solely by a type of institution may create issues moving forward if we wish to look at the quality of the student experience throughout their journey. The ability of students to shape quality in this diverging landscape is also significantly challenged.

In a sector which prides itself on its commitment to student engagement, putting students at the centre will necessitate changing the way we approach our work and investigating ways that we can see things from the student perspective. If we consider an articulating student or a student completing a 2+2 degree for example - such a student will graduate with the same qualification as someone taking a traditional route through university, and may even graduate at the same time and in the same ceremony, but the first part of their student experience will be assured and enhanced by a completely different set of quality arrangements. A student will be able to comment on the separate experiences but not the totality of it and enhancements occurring as a result of student engagement are limited to one part of the provision. This difference in quality processes also makes it difficult to look at comparability in the student experience.

Furthermore, the enhancement activities in the university sector do not interplay with those of the college sector and in the college sector it is currently difficult for college students to engage in any national sector enhancement priorities. So a student who articulates will only have access to activities around an Enhancement Theme once they transition to university, and will be less able to shape their experience than a student who takes a traditional route through university. A significant proportion of the student learning experience of a student studying an HNC or HND course is affected by decisions that are taken by the Scottish Qualifications Authority, whereas similar decisions about assessment for the traditional student are taken within the university. The distance between a college student and the SQA means that students are much less able to influence the decisions which affect them, so there is a deficit in student engagement between articulating students and students on a traditional route.

Whilst any solution to this problem should avoid doubling the administrative burden on colleges which offer both higher and further education, there is already a significant amount of duplication under the current arrangements for colleges within the University of the Highlands and Islands and for Scotland’s Rural College. An integrated solution which meets the needs of all the stakeholders should be sought.

This is a significant challenge for our quality systems. Currently, this is particularly true looking at the interplays between college and university but as learner journeys diversify it becomes even more complex. We would particularly welcome the review of the arrangement looking at this issue as a long term development.

**A measure of impact of the QEF**

The consultation seeks suggestions for a measure which could be used to document the impact of the enhancement approach. We are sympathetic with the reluctance in the sector to develop a quantitative measure. Such a measure or suite of measures may create an incentive structure which defeats the purpose of the enhancement agenda, for example by promoting competition between institutions which undermines the collaborative culture.

It should be noted that there is in fact plenty of evidence of the impact of the enhancement approach, although it is very qualitative in nature, and difficult to synthesise into a short summary. Each time an enhancement project is started, the colleagues involved will be able to articulate why they are undertaking the project, which problems they are trying to solve, or how the changes will make the student experience better. Whilst it may well be the case that such a project is unsuccessful, such experiences are important to the process of innovation and enhancement, and should not be dismissed out of hand. The impacts of individual enhancement projects are much more easily measured than the impact of the enhancement approach as a whole.

**If you have any enquiries regarding this response, please contact Eve Lewis, Head of sparqs**

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1. *A Student Engagement Framework for Scotland* (sparqs, Education Scotland, The Higher Education Academy Scotland, National Union of Students Scotland, Quality Assurance Agency Scotland, Scotland’s Colleges, Scottish Funding Council, Universities Scotland, December 2012). [↑](#footnote-ref-1)