

Annex A: Draft response

Questions relating to Proposal 1

Question 1a: Do you agree or disagree with the proposed definitions of ‘quality’ and ‘standards’ set out in Table 1 of Annex A and that this should be used to express minimum baseline requirements for quality and standards in revised B conditions?

We think we should maintain UK-wide quality approaches such as the UK Quality Code since staff, students and graduates move across the UK (and indeed beyond). International audiences generally perceive UK HE quality as a whole; not differentiated across the different nations. Further fragmentation could be problematic for institutions in all parts of the UK. This could have negative impacts on recruitment of international students, weaken transnational education partnerships and/or weaken the brand and reputation of UK HE. It is important that quality arrangements can be easily understood by international audiences and are related to international norms, such as the European Standards and Guidelines on Quality.

We value the balance between core UK quality expectations and the flexibility for the nations to have their own individual quality arrangements, including Scotland’s own Quality Enhancement Framework. Maintaining adherence to the European Standards and Guidelines on Quality is also critical. It is not only an expectation from SFC but is also important to our international reputation and our ability to work with partner institutions within the European Higher Education Area. Ministers from all the countries in the European Higher Education Area (including UK and, separately, Scotland) agreed the European Standards and Guidelines. These provide a shared understanding of quality in HE, which is one of the foundations for recognising qualifications and for student exchanges, and therefore for partnerships between institutions.

The Scottish sector is proud of our Quality Enhancement Framework and we are committed to maintaining this approach in Scotland, with the support of our partners (SFC, sparqs, NUS Scotland) and the Scottish Government. Student engagement and partnership is a cornerstone of our work on quality enhancement. Our Quality Enhancement Framework allows us to rigorously maintain standards while at the same time building on our achievements to make further improvements to our learning and teaching, as well as addressing any areas of weakness.

We believe all institutions can always develop their learning and teaching and enhance the student experience. The enhancement approach has worked well for us as a sector. It has led to strong networks and sharing of good practice across the sector. We have been able to focus on thematic areas where we need to develop; recent Enhancement Themes have addressed topics such as student transitions and Focus On projects have dealt with technology in learning and teaching. As a result of this work we have developed an extensive evidence base of practice and several toolkits, which have been used across the sector as well as attracting international interest.

We use a variety of mechanisms within the framework including the use of metrics, institution-led reviews of subjects and services, institutional reviews (Enhancement-led Institutional Review – ELIR) and the Enhancement Themes where the sector works collaboratively to address issues and share learning. Our most recent Enhancement Theme looked at how we can use evidence for enhancement and included work on qualitative and quantitative approaches to evaluation. This included work on things we do not currently measure but that add value: [Beyond the metrics - The Intangibles - Evidence for Enhancement \(enhancementthemes.ac.uk\)](#). The current Enhancement Theme [Resilient Learning Communities](#) offers the sector a range of opportunities to engage in areas of strategic importance including decolonising the curriculum and supporting students’ mental health.

- Question 1b: Do you have any comments about how the proposed definitions of quality and standards set out in Table 1 of Annex A should be assessed for individual providers?
- Question 1c: Do you agree or disagree with the proposal in paragraphs 41 to 43 to express initial requirements differently from the equivalent ongoing requirement for providers seeking registration?

Questions relating to Proposal 2

Question 2a: Do you agree or disagree with the proposed approach to assessing student outcomes set out in Annex B?

We are concerned about the approach to student outcomes. First, we are concerned that too much focus on low-quality and minimum standards gives the impression that there are widespread problems with quality in England (and by association the UK) and we do not recognise this as a widespread problem. Secondly, we are particularly worried about the lack of benchmarking. We absolutely agree that all students should have an excellent student experience, and none should have a lower quality experience because they are from a disadvantaged background. However, many of these students will face systemic disadvantage. To suggest otherwise is naïve and this disadvantage is likely to affect outcomes such as salary as can be clearly seen in the LEO data. Therefore, it is necessary to benchmark data in order to avoid introducing perverse incentives for institutions not to recruit certain groups of disadvantaged students. It is, of course, perfectly possible to look to improve outcomes while benchmarking data and this would be a better approach.

- Question 2b: Are there any other quantitative measures of student outcomes that we should consider in addition to continuation, completion and progression (see Annex B paragraph 18)?
- Question 2c: Do you agree or disagree with the proposals for the levels of study at which indicators should be constructed? Should any additional indicators be considered (see Annex B paragraph 25)?
- Question 2d: Do you have any comments about an appropriate balance between the volume and complexity of indicators and a method that allows us to identify ‘pockets’ of performance that are below a numerical baseline (see Annex B paragraph 32)?
- Question 2e: Do you agree or disagree with the demographic characteristics we propose to use (see Annex B paragraph 36)? Are there further demographic characteristics which we should consider including in the list of ‘split indicators’?
- Question 2f: Do you agree or disagree that the longitudinal educational outcomes dataset should be used to provide further indicators in relation to graduate outcomes (see Annex B paragraph 46)?
- Question 2g: Do you have any comments about how the range of sector-level performance should be taken into account in setting numerical baselines (see Annex B paragraph 57)?
- Question 2h: Do you have any comments about the other contextual factors that should be taken into account and the weight that should be placed on them (see Annex B paragraph 68)?

Questions relating to proposal 3

- Question 3: Do you agree or disagree with the proposals in Annex C for monitoring ongoing compliance with regulatory requirements for quality and standards?

Questions relating to proposal 4

- Question 4: Do you agree or disagree with the proposals in paragraphs 86 to 101 for our approach to intervention and gathering further information about concerns about quality and standards?

Questions relating to all proposals

Question 5: Do you have any comments about any unintended consequences of these proposals, for example for particular types of provider or course or for any particular types of student?

We recognise that England has its own quality systems for HE and the right to develop these. However, we have some concerns about the unintended consequences of these proposals on providers in Scotland because of the impact or potential impact on:

- ability to maintain a UK-wide HE sector; and

- international perceptions of UK quality.

We are also concerned about the focus on low quality and minimum standards, which may give a falsely negative impression of the UK HE sector.

Previously, definitions of quality and standards have been UK-wide. These were co-developed with the UK sector and housed in the UK HE Quality Code. We are concerned that the proposed approach waters down the Quality Code and therefore reduces UK-wide comparability, as well as potentially adding confusion about which quality and standards apply where. This is particularly important given that staff, students, and graduates move across the UK. Moreover, we have concerns that this approach does not meet the European Standards and Guidelines (ESG) on quality, which is a Ministerial commitment in the EHEA (of which both UK and Scotland are members) and which is an important factor in international partnerships.

International stakeholders see the quality of Scottish universities through the lens of the UK and do not delve into the detailed differences from England or other parts of the UK. We know this because of interactions we, QAA and others have had with them. This has always worked because of the common UK quality requirements (e.g., the UK Quality Code, the qualification frameworks, subject benchmark statements, the more recently introduced degree classification descriptors), with different quality assessment methods in the different nations. There is a very real possibility these proposals will negatively impact the reputation of UK HE internationally. This would have serious implications for our members, including financially, if it results in fewer international students, less interest in transnational education partnerships and a negative impact on the reputation and brand of UK HE.

Finally, some Scottish universities act as degree-awarding bodies for an English partner. It is important that these cross-border validation arrangements can continue. For example, for some important but niche courses, colleges may struggle to find an alternative body willing and able to validate the degree. It will be critical to ensure that the new arrangements do not increase the burden on either the degree-awarding body or the teaching body unnecessarily, remembering that the degree-awarding bodies in Scotland are already subject to the Quality Enhancement Framework (and Enhancement-led institution reviews include validated provision).

Question 6: Do you have any comments about the potential impact of these proposals on individuals on the basis of their protected characteristics?

As per our answer to Q2a, we are concerned that the lack of benchmarking could result in a perverse incentive to institutions not to recruit certain groups of students, which could include those with particular protected characteristics. This could be avoided via the use of benchmarking.