QAA Quality Code Consultation

Submitted by Association of Colleges
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Background

The Association of Colleges (AoC) represents and promotes the interests of 279 further education (FE) and sixth form colleges established under the Further and Higher Education Act 1992.

Colleges are inspirational places to learn because education and training is delivered by expert teaching staff in industry-standard facilities. Colleges offer first rate academic and technical teaching, at levels ranging from basic skills to postgraduate in a range of professions including engineering, hospitality, IT, construction and the creative arts. Sixth form colleges provide high-quality academic education to 16 to 18-year-olds enabling them to progress to university or higher level technical education.

College HE Key Facts

- 219 colleges offer Higher Education (HE).
- 159,000 people study HE in a college.
- Colleges deliver 85% of HNCs, 82% of HNDs and 58% of foundation degrees.

AoC recognises that the Quality Code is the reference point for managing quality and standards in UK higher education. There is an increasing level of divergence in the four nations, as well as amongst the providers within. The Quality Code is an important binding element between the four nations which will be even more important considering the proposed changes in the regulatory system in England. While enhancement is a fundamental part of the Scottish system, it will not be a condition of registration with the OfS.

We agree that the code will benefit from review, particularly to improve its accessibility, clarity and structure, and its UK-wide application. However, we do not believe that the current proposals will fully meet these objectives.

As a body that represents the interests of English Further Education Colleges, our responses mainly relate to an English context, however, we fully support the necessity and merits for the code to remain UK-wide in its scope.

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

We accept that the code can benefit from simplification, and an approach using levels of aggregation should ensure it is relevant in the four nations of the UK. However, we are less convinced that the current proposal will provide a coherent and comprehensive framework for assuring quality and standards in UK higher
education. The risk based regulation calls for a strong external reference point, which the Quality Code should provide.

We believe that the new regulatory framework in England does not have an explicit focus on improvement and enhancement. Colleges use the present Quality Code not only for meeting expectations but also for developmental purposes. From an English perspective, it is not clear how the proposed code can be used to support performance above the baseline and therefore how it could be used for enhancement purposes.

Under the new regulatory framework in England, TEF will be one of the prime indicators used to identify risk and encourage performance above the baseline. TEF is a voluntary scheme and only 50 percent colleges participated in TEF year 2. We anticipate that this participation will increase, however, TEF is likely (and should) remain a voluntary scheme for small providers and therefore the TEF indicators (ratings and referral by TEF chair) will not be applicable for all providers. Any relationships between how the proposed quality code and TEF will work in practice needs more clarity.

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

The revised expectations have been produced, in part, to offer a simplified set of expectations that can be understood by a range of audience including students and possibly staff in institutions that may not necessarily have expertise in quality assurance. We agree that a simplified set of expectations will help achieve this objective, however, we are concerned that the current set of expectations may not appropriately express the outcomes that students and stakeholders would want and expect from higher education providers.

It is important to acknowledge who are the anticipated staff who will use the simplified code and equally how providers with different levels of maturity will use the code in the future. For instance, the new proposed streamlined layer to the code, consists four expectations which will be the ‘most referred to’ top level statements and while these are simple, these feel very broad in what they can communicate to the stakeholders. The high performance baseline also does not seem obvious to be drawn from these top level statements.

We are concerned that the focus on ‘student engagement’ is not explicit in the streamlined set of expectations. This is one of the strengths of the current code and does not feature in the streamlined version of the code.

It is also not apparent whether the four expectations or the core practices or a combination of these will inform the baseline. The four expectations seem broad whereas core practices do not seem exhaustive.

The section on ‘Introduction to the Quality Code’ is an important part of the code and it is not apparent where this introduction will feature in the new scheme. The top four
expectations, and the new layer will require some contextual introduction, especially for new providers.

In addition, some of the language used in the expectations needs to be re-visited. For instance, there is a reference to the value of qualifications ‘over time’, which is ambiguous.

**Question 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?

a) We believe that there will be inconsistencies in how these practices may be used across the four nations. Some practices that may be supplementary in England may be a core practice in other nations. For this reason, we suggest that there are no supplementary practices but all practices are rated at the same level.

b) Our response to this is once again related to the level of maturity of providers who will use the code and for what purpose. For instance, how new entrants to the sector will approach the code and use it. The detail which will underpin each of these core practices will be crucial in determining the value of each of these core practices and how these will be used by providers.

It is also not clear whether the chapters in the current code will more or less appear under each of these practices (to provide the details) and what elements of the current code will be potentially lost.

There is an overall lack of student engagement as a core practice in the proposal. There are some additional omissions in the core practices including externality, such as, the role of external examination and PSRBs.

**Question 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?

a) See 3a above.

b) Similar to our response above, further detail is required on the detail that will underpin each of these core practices under Quality.

We believe there should be a clear recognition that all programmes of different types (including professional and technical HE) should support students to achieve successful outcomes. As stated in core practice 6 under Quality, high-quality
research programmes require supportive research environments, however, employer focussed programmes in colleges demand different types of support for students.

Some of the core practices under quality can be simplified. For instance ‘High-quality research programmes take place in appropriate and supportive research environments so that students are supported to achieve successful academic, personal and professional outcomes’ is conflated and perhaps needs to be split into two separate core practices. It is also important that ‘research’ is extended to research and scholarship to broaden the understandings of research. This is relevant for colleges that may not deliver research programmes, but actively support applied research and scholarship in their programmes.

Likewise, the core practice ‘the provider has a reliable and fair admission system that results in students being matched to appropriate courses and provided with the support necessary for a high-quality academic experience and successful completion’ needs to be disaggregated. While one aspect is admission specific, the latter is about student support which can be better expressed as a distinct core practice.

There are other omissions in the core practices- teaching and learning, monitoring and review are not explicit.

**Question 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?

   a) See 3a above.

   b) We believe that enhancement led approaches should not be seen as supplementary practices so that they are not viewed as a postscript to the core practices.

Supplementary practices such as employability, work-based learning, working with partners, and flexible and distance learning are all core practices for higher vocational education, and technical and professional higher education. These should be not be treated as supplementary but core practices.

**Question 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?**

Quality Code was designed by the sector, for the sector and we believe that spirit should be nurtured. Consultative approach, such as the one taken by the UKSC and
QAA will help to continue to engage with the sector, students, employers, PSRBs, and indeed be extended to include various potential users of the code within HE providers.