

Annex A: UKSCQA response to the regulatory framework consultation

General comments

The UK Standing Committee for Quality Assessment (UKSCQA) provides sector-led oversight of higher education quality assessment arrangements that continue to be shared across the UK, supporting a UK-wide approach to the co-regulation of quality and standards, as much as is possible in a devolved environment. The Committee's current remit incorporates oversight of: the UK Quality Code; the baseline regulatory requirements; programmes of work ensuring the reliability of degree standards; and additional projects supporting the quality of UK HE provision. UKSCQA is responding to the Consultation from a UK-wide perspective, and comments are limited to those areas directly within its remit.

As a general point, it would be helpful if cross-border issues were considered when finalising the OfS regulatory framework. When detail behind the Framework is published, specificity will be important on how it is envisaged the UK funding bodies and regulators will work together. Collaboration across the nations will maintain the UK's international reputation in HE, despite the diversity of approaches across the nations.

A common interest across the four nations is supporting meaningful student engagement, with students considered as full and active partners throughout their student experience. It would be useful to address how the nations can work together to achieve this in each quality assessment framework.

Consultation question 3: Do you agree or disagree that a new Quality Review system should focus on securing outcomes for students to an expected standard, rather than focusing on how outcomes are achieved?

A focus on outcomes should encompass the importance of the quality of the student experience while a student is studying at a provider. More detail would be welcomed on how the regulatory framework will work with and accommodate systems across the UK (including the enhancement based frameworks of Scotland and Wales). The proposed focus on outcomes does represent further diversity of approaches across the UK, and it is important that the nations still work together to ensure consistent quality levels across the UK. The quality review process that is implemented should also not lose sight of students supported through transnational education.

Question 4: Would exploring alternative methods of assessment, including Grade Point Average (GPA), be something that the OfS should consider, alongside the work the sector is undertaking itself to agree sector-recognised standards?

UKSCQA oversees a number of programmes of work aimed at supporting the reliability and comparability of degree standards, including an analysis of the sector's approach to degree classification algorithms. This report, led by [UUK/GuildHE](#) found that the sector's appetite for implementing GPA has so far been low. Moreover GPA is about classification and certification, rather than assessment.

Question 9: Do you agree or disagree that participation in the TEF should be a general condition for providers in the Approved categories with 500 or more students?

The results of the Independent Review of TEF and the subject pilots will be important for considering the impact of this framework on cross-UK working. Although participation is an option for the other nations, the TEF has been developed with English policy concerns at heart (in distinction to the REF, which was developed in collaboration on a UK-wide basis).

Question 13: The initial conditions should provide reassurance that providers will be able to meet the general ongoing conditions without creating unnecessary barriers to entry. Given this, are the initial conditions appropriate? Within your response to the question above, you can provide commentary on any of the conditions, with reference to the Guidance (quality B-C).

Yes. UKSCQA is currently working to ensure a future-facing, agile and UK-wide Quality Code is achieved through the Quality Code review, and we would hope sufficient alignment can be achieved between the expectations and practices of the Code and OfS' conditions of registration.

Question 19: Do you agree or disagree with the proposed approach to risk assessment and monitoring?

Currently, a number of shared principles supporting quality assessment across the UK are articulated through the baseline regulatory requirements. Given the approaches proposed in this consultation, the future of the baseline regulatory requirements is unclear. We would hope that a similar or equivalent coordinating mechanism can be put in place once OfS is operational, to ensure that each nation is interpreting minimum quality levels in the same way.

Question 21: Do you agree or disagree with the proposed approach the OfS will take to regulating providers not solely based in England?

The OfS has a responsibility to ensure the quality of outcomes and the student experience for all students receiving the benefit of English HE provision, and it is logical that this includes students undertaking transnational education.

Question 23: Do you agree or disagree with the principles proposed for how the OfS will engage with other bodies?

The interoperability of systems across the UK should be a core principle when the OfS reaches a more detailed design phase for the regulatory framework.

More clarity would also be welcomed on how it is envisaged the OfS will work with the Designated Quality Body. A DQB can have an important role in supporting the coherence of the UK HE system, by encouraging and facilitating the sharing of best practice in quality assessment across the nations.

In addition, there should be sufficient linkages between the OfS and UKRI in terms of protecting the student interest and ensuring student groups (such as degree apprentices, PGR, and Initial Teacher Training amongst others) do not fall between the boundaries of the two organisations. Again, we would encourage collaborative working between the OfS and

the other nations in supporting these student groups, in order that the OfS can work effectively with UKRI as a UK-wide body.

Question 24: Do you have any comments on the proposed exercise of OfS functions in relation to validation, in particular in relation to ensuring that the validation service is underpinned by the necessary expertise and operates in a way that prevents or effectively mitigates conflicts of interest?

Cross-UK issues should be considered when addressing this question, in particular the precedents that might be set by a regulator acting as a provider.