Education Select Committee inquiry: Value for money in higher education

Written evidence submitted by the Quality Assurance Agency for Higher Education

October 2017

1 The Quality Assurance Agency for Higher Education (QAA) is pleased to have the opportunity to submit written evidence to the Education Select Committee's inquiry into value for money in higher education.

About QAA

2 QAA is the UK's independent, expert, higher education quality assurance agency, a registered charity and not-for-profit organisation. QAA safeguards standards, and drives quality assurance and enhancement (systematic improvement) for all providers of higher education. Students play a key role in its governance and are involved in all of its activities.

3 Since its foundation in 1997, QAA has conducted over 4,500 quality and standards reviews, adapting, innovating and evolving methods to meet the changing needs of an increasingly diverse sector; governments; students; professional, regulatory and statutory bodies; and employers. QAA works with over 600 higher education providers including universities, colleges and alternative (independent) providers. International regulators look to QAA as the guarantor of the quality of UK higher education.

Executive summary

- Analysis of QAA reviews shows a strategic commitment by providers to (and investment in) students' employability. A number of case studies are provided in this submission
- QAA is working with an external advisory group to update 2012 guidance on enterprise and entrepreneurship which has helped to raise the profile of this subject in higher education, and has also been influential with policy makers in the UK and internationally
- Assuring the quality of higher and degree apprenticeships is essential to ensure they are a valued career route. Sector organisations including QAA are working together to develop the quality framework for higher and degree apprenticeships
- The Access to HE qualification has real impact in widening participation and can transform lives. As the regulatory landscape continues to shift, QAA believes the Access qualification must be safeguarded and properly funded for the future
- Student submissions to QAA reviews show that overarching issues have more recently become value for money and inconsistencies in the student experience
- Between 2013-16, QAA's Higher Education Review identified over 560 features of good practice in relation to learning and teaching
- The UK Quality Code is a core reference point for quality and standards, and remains vital to ensuring the coherence of the UK higher education brand, and supporting a world-class sector which adds significant value to the UK economy
and society

- In relation to current debates around degree grade inflation, there are two elements to assess: how much is legitimate student improvement and how much is driven by illegitimate grade inflation. Work is underway by Universities UK, GuildHE, QAA and other sector partners on this
- In 2015-16, there were 701,010 UK transnational education (TNE) students studying offshore for UK awards. It is important that consideration is given to how TNE is assured in the future in a way that maintains the confidence and trust of international governments and regulators, and safeguards the interests of UK TNE students
- Students should have a central role in the governance of the Office for Students, and should continue to be involved and empowered in shaping their own learning experiences

Graduate outcomes and the use of destination data

Employability

4 Employers are important partners for higher education research and development, workforce and continuing professional development, and as providers of student placements, work experience opportunities, and higher and degree apprenticeships.

5 QAA has found that providers generally work well with employers. Analysis of QAA reviews shows that providers have made strategic commitments to (and investment in) students’ employability. Over 260 examples of good practice were identified through QAA's reviews in 2015-16 (Higher Education Reviews in England, Northern Ireland and Wales), of which around a third related to developing students' employability and employer relationships. In the context of higher education provided in further education colleges, particular value can be achieved in close local working with students, and strong local employer links and collaborations. QAA publishes a series of good practice case studies on topics including employability. Examples from a range of providers are provided below.

6 Case study - Furness College: Furness College received a commendation in its QAA review in February 2016, for the enhancement of student learning opportunities. The college has helped to shape its local economy through strategic engagement with local stakeholders. It has a partnership arrangement with BAE Systems, a global defence and aerospace company. The college's business and employer support team handles its work with BAE, including apprenticeships, higher education and commercial business. A member of college staff spends time on site at BAE, whilst a BAE manager is permanently based at the college. This demonstrates the value each organisation places on their relationship and the importance of supporting students' learning. The college has also developed an economic growth plan in partnership with employers and the local council.

7 Case study - Royal School of Needlework: The School received a commendation for the quality of its student learning opportunities in its QAA review in June 2016. QAA noted 'the extensive involvement of employers and students in programme design and development.' The School is a specialist provider with an international reputation for excellence in hand embroidery. Students develop their creative practice through a unit-based curriculum, engaging with leading-edge practitioners, and working on live projects and schedules. The School's Studio is a commercial space creating private commissioned works for external clients at an international level. Second-year degree students study on projects with external collaborators. Clients are involved in the evaluation and feedback process, and a number of them have offered students and graduates internships or employment.
QAA's Enhancement-led Institutional Review process in Scotland has also identified good examples of universities and employers working together. A QAA report on reviews undertaken in 2013-16 considered employability and graduate attributes, highlighting examples such as employer involvement in curriculum development and how providers ensure students gain work-related experience. A case study is provided below.

Case study - Robert Gordon University: QAA's review in April 2016 found that the university had a network of established relationships with employers and professional, statutory and regulatory bodies (PSRBs). These links complement the curriculum, are recognised and valued by staff and students, and form the basis of diverse opportunities for work-related experience. Of note is the university's Talent Exchange initiative, which aims to widen work-related experience opportunities by connecting local business and organisations, specifically small to medium-sized enterprises (SMEs), with students and staff.

Enterprise and entrepreneurship

In 2012, QAA published guidance on enterprise and entrepreneurship which has helped to raise the profile of this subject in higher education, and has also been influential with policy makers in the UK and internationally, including use by the Organisation for Economic Cooperation and Development, the United Nations Conference on Trade and Development, and by the European Commission in a mapping exercise to develop an entrepreneurship competency framework (EntreComp).

Case study - University of Sheffield: QAA's 2012 guidance on enterprise and entrepreneurship helped the university to develop a strategy for enterprise education and embed enterprise across the curriculum. The aim of the university's Enterprise Education Strategy was for every student to have the opportunity to develop enterprise capabilities within their course. The university created an Enterprise Academy, the first model of its kind in the UK. It provides curriculum development support for academic colleagues, training and development, events and funding opportunities. The Academy has had real impact: in 2015-16, it supported 172 academic colleagues, leading to 46 instances of curriculum development across the institution, impacting on at least 1500 new students.

In October 2016, the Co-Chairs of the Council for Science and Technology wrote to the Prime Minister with recommendations to strengthen entrepreneurship education to boost growth, jobs and productivity. In her response, the Prime Minister suggested a review to measure the impact of QAA's guidance, on which an updated version could be built. QAA is taking this forward, working with an external advisory group chaired by Professor Andrew Penaluna, Professor of Creative Entrepreneurship at the University of Wales Trinity Saint David. In workshops to date, providers have told QAA that they use the guidance to shape their curricula, design and validate programmes in this area, and secure strategic and management buy-in for enterprise and entrepreneurship initiatives. The updated guidance will be launched in January 2018.
Social justice in higher education and support for disadvantaged students

Higher and degree apprenticeships

14 QAA is committed to assuring the quality of higher and degree apprenticeships, to ensure they are a valued career route. QAA is working with sector partners to develop the quality framework for higher and degree apprenticeships, and is a member of the Institute for Apprenticeship’s Quality Alliance. This has included contributing to the Department for Education’s Apprenticeships Accountability Statement (published April 2017) and producing QAA’s sector guidance in May 2017, Quality Assuring Higher Education in Apprenticeships: current approaches. QAA has also provided input to the Institute’s draft quality statement, on which it recently held a consultation. The statement is intended to define what an apprenticeship is, what a high-quality apprenticeship looks like and how that should be judged.

Access to HE qualification

15 QAA is proud to manage the scheme for the recognition and quality assurance of Access to HE courses in England and Wales. The Access to HE Diploma is a qualification which prepares people without traditional qualifications for study at university and can transform lives: it delivers real impact and value.

16 Case study - Nneka Akudolu, Barrister: ‘I was in a waitressing job, working anti-social hours for very little money. I had to step back and look at my options, but with four GCSEs to my name, I felt I didn’t really have many! I just wanted to get a degree and see where that took me. I saw an advert for an Access to HE course taught at Tower Hamlets College. At the beginning of the course, I found it daunting to get back into studying and doing homework after being out of education for so long, but that soon passed. The tutors were incredibly helpful and motivating, and the students supported and encouraged each other. But the real highlight for me was when I received an offer of a place at Cardiff University. I definitely couldn't have taken a degree without first completing the Access to HE course. I had bags of confidence after completing the course. I now have a good job, which will hopefully enable me to be financially stable in the future. My earning capacity has increased enormously.’

17 QAA worked with UCAS and sector representatives to secure the inclusion of the Access to HE Diploma in the UCAS tariff, for the September 2017 student intake onwards. This has strengthened and positioned the Diploma within the mainstream and admissions offices, and provided higher education with a clear statement of where it sits in relation to other qualifications. The Access to HE key statistics (2015-16) underline the continued positive impact of this qualification in widening participation in higher education:

- 23,660 Access to HE Diploma students entered higher education in England and Wales, of which:
  - 87% were over 21 years old
  - 23% from low participation areas
  - 31% from ethnic minority backgrounds
  - 17% had a disability or learning difficulty.

18 Historically, QAA has managed the Access recognition scheme through contributions from the funding bodies in England and Wales, higher education subscribers and fees from the agencies which validate the qualification (AVAs). Since 2015-16, funding has been significantly squeezed by a reduction in funding body contributions. QAA welcomed recognition of the Diploma’s contribution by Jo Johnson, Minister for
Universities, Science, Research and Innovation in his 2017-18 grant letter (February 2017) to the English funding body, which secured funding for QAA's work this year:

'The QAA-regulated "Access to Higher Education" Diploma makes a valuable contribution to widening participation in higher education. While the arrangements for quality assurance are changing within the sector, we would like you to support this valuable scheme to ensure the Diploma is regulated for 2017-18. Given the changes in the higher education regulatory framework that will result from the Higher Education and Research Bill... and the potential importance of the Diploma in taking forward our widening participation objectives, we wish to consider how best the QAA could optimise the take-up of the Diploma, including future activity and funding levels, to most effectively assist in the achievement of our social mobility goals.'

As the regulatory landscape continues to shift, QAA believes that this important qualification must be safeguarded and properly funded for the future.

**Quality and effectiveness of teaching**

**Teaching quality: outcomes from QAA reviews**

QAA introduced student written submissions to its review methods in 2002. This was a pioneering initiative and, today, student engagement in quality assurance and students as partners in their education is the norm in universities. QAA’s 2017 analysis of these submissions, Taking the Long View of the Student Voice, found that students have remained concerned about contact time, assessment and the need for timely feedback. Teaching quality was a minority concern in earlier submissions but, following the 2011 higher education reforms, QAA has seen changes in their focus. Overarching issues have become value for money and inconsistencies in the student experience. Students tend to have a greater awareness of differences between subjects in the levels of contact with staff and the provision of resources. They are also more concerned about hidden costs and the accuracy of published information. These findings concur with 2013 research commissioned by QAA with King’s College London into student expectations and perceptions of their education.

QAA's Higher Education Review ran in England, Northern Ireland and Wales for three years from 2013-2016, for universities and further education colleges providing higher education. Overall, over 560 features of good practice were identified in relation to learning and teaching. QAA found that universities performed consistently well: 97% of those reviewed in 2013-16 received satisfactory judgements and around a third received one or more commendations. QAA reviews of further education colleges found a wider range of performance, with around 30% receiving one or more unsatisfactory judgements, and 13% receiving commended judgements. The quality of learning and teaching was therefore more mixed: some colleges offered an outstanding student experience, while others had weaker academic practice. QAA's work with colleges providing higher education has focused on guidance and enhancement activities to improve performance.

QAA also conducted reviews of 38 alternative providers in 2015-16 (Higher Education Review (Alternative Providers)), with four providers receiving commendations - two for the quality of student learning opportunities. A case study is provided below.

Case study - London School of Business and Management: The School provides extensive support for the continuing professional development of its staff. All academic staff are supported to become Fellows or Senior Fellows of the Higher Education Academy. The School’s teaching, learning and assessment strategy includes a confidential peer teaching observation scheme, aligned with the UK Professional Standards Framework for
higher education. Good practice is shared through the School's Teaching and Learning Forum, and its annual Teaching and Learning Conference.

24 QAA has commissioned additional external research on the outcomes of Higher Education Review, which will be published by the end of 2017. Initial findings show that there has been considerable investment by providers in training and developing staff, to support and develop student achievement. The findings also show a range of professional development opportunities available to staff and staff in partner organisations, and support for disseminating good practice to improve learning and teaching.

Teaching Excellence Framework (TEF)

25 QAA has contributed to the Teaching Excellence Framework’s development and implementation, including working closely with HEFCE to manage the assessment process for 299 providers in TEF Year 2 (2016-17).

26 QAA continues to contribute to the further development of the TEF and hopes to play a role in future assessments. In order to take account of the full range of diverse and innovative approaches to teaching across the sector, the TEF should be considered alongside other methods for assessing teaching quality to avoid duplication. As a desk-based process, it does not include direct engagement with providers and their students which can add another dimension to assessment. Also, with its particular focus on teaching, the TEF cannot look at other quality-related aspects of the student experience, such as selection and admission, student complaints, or the quality of provision delivered with other organisations.

Academic standards

27 There has been an increased public focus on standards in higher education in recent months. The UK Quality Code for Higher Education gives all higher education providers a shared starting point for setting, describing and assuring the academic standards of their higher education awards and programmes, and the quality of the learning opportunities they provide. The UK also aligns with the expectations of the European Higher Education Area, to ensure the wider recognition of UK awards and qualifications, and to enable staff and student mobility.

28 QAA is responsible for the design, management and development of the Quality Code on behalf of the sector, working with the UK-wide Standing Committee for Quality Assessment. QAA and the Committee are currently undertaking a consultation on bold proposals for reform of the Quality Code, to ensure it remains agile and responsive in the context of ongoing regulatory change.

29 As higher education is a devolved matter, there is increasing divergence of policy across the UK. The Quality Code is vital in ensuring the coherence of the UK higher education brand and supporting a world-class sector which adds significant value to the UK economy and society.

30 There are no longer regular external reviews of standards for universities and colleges in England and Northern Ireland, following changes to quality assessment introduced from 2016 by their funding bodies. Under the provisions of the Higher Education and Research Act 2017, a designated independent quality body would have responsibility for assessing the quality of, and the standards applied to, higher education in England. It is the view of QAA that the new regulatory framework being introduced should include capacity for the designated quality body to investigate issues or concerns raised in this area, to ensure public confidence in standards is maintained. Confidence can also be maintained through capacity for random and thematic reviews by the designated quality body, as part of a new
risk-based approach.

31 In relation to current debates around degree grade inflation, there are two elements to assess: how much is legitimate student improvement and how much is driven by illegitimate grade inflation. QAA is working with Universities UK and other sector partners on this, with a project underway to develop strengthened benchmarks for degree classifications, analysis of trends and drivers of grade inflation, and a review of the tools and practices for managing standards.

UK transnational education

32 **QAA is responsible for assuring transnational education** (TNE) - higher education delivered overseas - for the UK sector, underpinning its world-class reputation. In 2015-16, there were 701,010 UK TNE (offshore) students, of which 74,965 were studying within the EU and 626,045 outside the EU [source: **HESA**]. Over 80% of UK universities are engaged in some form of TNE, either through distance learning, partnerships or branch campus arrangements. Significantly, this provision is being delivered across all continents (bar Antarctica). TNE now represents the main area of growth in UK higher education in terms of student numbers. The latest HESA data show that, whilst the total number of students studying on higher education programmes in the UK has declined by approximately 8.8% over the past five years, the number of students studying for UK TNE awards has risen by 39% over the same period. TNE student numbers now exceed the number of international students in the UK by around 60%.

33 QAA has undertaken TNE reviews in countries including China, Hong Kong, India, Malaysia, Russia, Singapore and the United Arab Emirates, and operates 15 formal strategic relationships with quality bodies overseas to provide confidence in UK TNE provision. QAA is currently running a three year programme of TNE reviews, covering Ireland (2017), Hong Kong (2018) and Malaysia (2019). However, with resources and funding to allow for only one country review per year, the present system may in future come under pressure. It will be important to ensure that TNE students continue to be included in the system as a matter of course, and consideration given to how TNE is assured in the future to maintain the confidence and trust of international governments and regulators, and safeguard the interests of UK TNE students.

The role of the Office for Students

34 The **Higher Education and Research Act 2017** will bring a new framework into place for English higher education. QAA welcomes the planned designation of an independent quality body under the provisions of the Act. QAA has submitted an expression of interest to be that body, and would work in partnership with the Office for Students (OfS) to design and deliver an efficient, proportionate, risk-based approach to quality assessment, addressing issues and weaknesses in the management of academic quality and standards as they arise, and safeguarding the interests of students.

35 Whilst not a feature of the new regulatory framework for England, quality enhancement is a key feature of the arrangements for Scotland and Wales. QAA will continue to offer enhancement-focussed services on a voluntary basis for English providers at both an institutional and a system-wide level.

36 Under the Act, the Office for Students has a specific duty to ‘promote quality, and greater choice and opportunities for students, in the provision of higher education by English higher education providers.’ QAA believes that students should have a central role in the governance of the Office for Students and welcomes the recent announcement of a student panel to inform the Office's decision-making. QAA has two student members of its own
Board and a Student Advisory Committee.

37 QAA is committed to ensuring students continue to be involved and empowered in shaping their own learning experiences. Student engagement was covered as a specific chapter (Chapter B5) in the Quality Code and, as part of the current consultation on a reformed Code, is proposed as a topic within a new range of supplementary guidance. Under the Act, the designated quality body will have responsibility for assessing academic quality of institutions under general guidance from the Office for Students and sole responsibility for assessing academic standards. If designated, QAA would continue to focus both on value for money for students in its work and student involvement in its assessment processes.