

# Quality Assurance Agency for Higher Education

## Written evidence to the review of post-18 education and funding

May 2018

### Executive summary

- QAA is the only body involved in the regulation of higher education that has a UK-wide remit.
- Although the review is an England-only exercise, it can benefit from approaches taken in other jurisdictions. For example, the articulation arrangements in Scotland have proved effective in widening participation and Wales is adopting new approaches to student financial support.
- There is no shortage of information and guidance about post-18 education options and costs available to prospective students. However, the range and variety of sources can be confusing.
- QAA's reviews see higher levels of unsatisfactory judgements for colleges than for universities. The further education sector would benefit from a medium to long-term funding strategy to assure quality.
- The Access for HE Diploma has proved highly effective in providing a pathway to higher education for students without traditional qualifications.
- QAA's research, based on long-term analysis of student submissions, shows a correlation between an increase in the importance students place on value for money and rises in the level of fees charged by institutions.
- A lack of funding to support living costs is a significant barrier to entry and success in higher education.
- High quality alternatives to traditional three-year undergraduate courses, such as accelerated degrees, may benefit higher education by providing greater choice and opportunity.
- The UK Quality Code for Higher Education, currently under revision, underpins quality and standards in higher education. The quality of higher education is directly linked to value for money.

## About the Quality Assurance Agency for Higher Education (QAA)

- 1 QAA is the UK's independent higher education quality body. It is a charity and its governance structure is designed to balance the interests of students, providers, funders, the professions and the four nations.
- 2 QAA reviews UK higher education wherever and however it is delivered, from universities and further education colleges, to specialist institutions and independent providers, as well as UK higher education delivered internationally (transnational education).
- 3 The quality of UK higher education is underpinned by the [UK Quality Code](#), which sets out the fundamental principles that apply to higher education quality across the UK, irrespective of changing national contexts. These include principles such as emphasising the role of providers in assuring the quality of the experience they offer to students, supporting student engagement, and ensuring external referencing is used to ensure the integrity of awards and the quality of provision. QAA is currently revising the Code, working with the UK Standing Committee for Quality Assessment, to ensure it is streamlined and fit for the future. The expectations for institutions contained in the code will directly link to the provision of value for money, in terms both of quality (e.g. that courses are well-designed and provide a high quality academic experience for all students) and academic standards (e.g. that qualifications retain their value over time).
- 4 QAA's work internationally protects the world-class reputation and brand of UK higher education, for example: reviewing UK transnational education; formal strategic agreements with quality bodies in 15 other countries; meeting European and wider international standards for higher education quality assurance; and inclusion on the European Quality Assurance Register for Higher Education (EQAR).

### Part 1: Choice and competition across a joined-up post-18 education and training sector

- 5 We have not yet achieved a coherent post-18 education and training sector in England, which can be confusing for those trying to navigate their way through it, but this does not suggest there should be some forced alignment between the training and higher education sectors, nor the sectors pitched against each other. Instead, collaboration between colleges and universities should be incentivised.
- 6 While there is no shortage of information available to students and prospective students, the sheer diversity of source and content can make it difficult to make informed choices. The view of members of QAA's Student Advisory Board is that improved access to information, advice and guidance would significantly benefit decision making. Clear information for prospective and current students is critical in helping them to make choices about courses, providers, academic or technical routes, and understanding potential graduate outcomes. The student information strategy to be developed by the Office for Students will provide further guidance on what will be expected from providers. The focus should be on providing clear, accessible and readily obtainable material. In QAA's view, information should be provided where students go (e.g. UCAS), rather than expecting students to be attracted to government websites (e.g. gov.uk).
- 7 Universities tend to have greater stability in funding arrangements than colleges. In QAA quality reviews, around three per cent of judgements for universities have been unsatisfactory, compared with a figure of around 30 per cent for FE institutions. In our view, FE needs to be appropriately funded, so that colleges can invest in the effective

strategic management of their HE provision. A medium to long-term funding strategy for the further education sector would assist strategic and financial planning.

8 With many FE institutions offering degrees, coupled with the growth of post-18 education options including higher and degree apprenticeships, divisions between further and higher education provision are becoming increasingly artificial. However, achieving a true parity of esteem between academic and technical qualifications remains a challenge and can affect student choices.

9 In order to enable students to make genuine choices between academic and technical routes, it is key to ensure there is high quality, diverse UK higher education provision which is of equal excellence, no matter what form it takes. This includes high quality alternatives to the traditional three-year, on-campus experience, so long as these meet the national expectations for standards.

10 The increasing focus on student outcomes across UK higher education (rather than duration of study) means that accelerated courses can meet required standards and deliver high quality academic experiences, providing welcome extra choice for students. A 2017 [QAA policy paper on accelerated degrees \(PDF, 97KB\)](#) included case studies from Abertay, BPP and Staffordshire Universities, providing insights into the benefits of, and logistical adjustments required in, delivering these courses. While some logistical issues over delivery were identified, such as timetabling in conjunction with other programmes, all the universities interviewed were extremely positive about their programmes. Support, guidance and sharing of good practice will be important for providers in developing increased numbers of accelerated degree programmes.

11 Higher level apprenticeships are also key in building the right skills base for employers and the economy. However, that each part of the UK describes these differently is confusing for apprentices and employers. If an apprenticeship is to be described with the inclusion of the legally protected title of 'degree' it must include the academic rigour required of a degree, otherwise apprentices and employers could be misled about what the qualification is.

12 Degree apprenticeships are being offered by increasing numbers of higher education institutions and, as they do not have the same cost implications for students as other qualifications, we expect this growth to continue. However, the delivery of good degree apprenticeships requires multi-agency oversight, co-ordination and resourcing. There are particular quality assurance considerations for these qualifications, given their significant work-based components and employer-oriented nature. QAA is working with Ofsted, the Institute for Apprenticeships and the Office for Students to develop the quality framework for higher and degree apprenticeships, in the wider context of the new higher education regulatory framework for England.

13 Consideration must also be given to choices later in life for continuing and lifelong learning, where part-time and distance learning options can become more attractive or practical. To ensure that the UK workforce can continue to upskill, the effects of the continuing decline in part-time students need to be addressed, including looking at any barriers presented by the current funding system.

14 Improved choice and competition can also be achieved through credit transfer. Credit is a means of quantifying and recognising learning whenever and wherever it is achieved. QAA publishes the higher education qualification frameworks, which use academic credit as the basis for the design and development of programmes of study. Academic credit can also be used as a tool to compare learning achieved in different contexts. Credit frameworks that can facilitate student mobility are in place, and information about what this can mean for students should be part of the communication suite.

15 Research by both the [Department for Education \(PDF, 122KB\)](#) and [QAA](#) suggests that the credit frameworks are well understood and well used by institutions - over 90 per cent report using credit as the basis for programme design. However, Department for Education research shows that while most institutions offer the opportunity to switch courses, levels of take-up are low, particularly when seeking to transfer between institutions. The Office for Students will be working with providers on this to improve student awareness and information, as a condition of registration. In order to improve take up, autonomous degree-awarding institutions will also need to be able to assure themselves that other providers are applying credit frameworks appropriately and can trust an incoming student's transcript.

More research into how institutions use and view credit would support this. This should include consideration of the European Credit Transfer System (ECTS), an important element of the Bologna Process, which ensures compatibility in the standards and quality of higher education qualifications across Europe.

16 As the UK's quality body, QAA is committed to supporting new, high quality, innovative provision, and innovation was the theme of the 2018 QAA annual conference. Feedback from providers is that one of the barriers to developing new, high quality programmes can be the cost and risk involved. However, if the quality bar was lowered to aid new providers the broader reputation of UK HE could be put at risk. As the new regulatory framework is developed for English higher education, it will also be important to keep the UK Quality Code under review to safeguard standards and quality, and to account for new practice and enable innovation.

## **Part 2: A system that is accessible to all**

17 One of the Core Practices in the revised Quality Code is that 'The provider has a reliable, fair and inclusive admissions system.' Under the new quality system in England, QAA will consider to what extent providers are ensuring this applies to *all* students from *all* backgrounds.

18 QAA has recently launched a new regional network programme, and would seek to work with the Director for Fair Access and Participation at the Office for Students to help promote and disseminate access strategies and information.

19 Although this review is an England-only exercise, as QAA has a role in higher education regulation across the UK, we believe there is policy and good practice from all jurisdictions that have relevance.

20 In Scotland, formalised relationships between further and higher education institutions is seen by the Scottish Government as a driver to improve diversity in, and access to, higher education. Universities engage in formal articulation arrangements with colleges to encourage larger numbers of students to progress from college into university without any loss of study time.

21 In Wales, the [Diamond Review](#) has made wide-ranging recommendations around higher education funding, many of which have been accepted by the Welsh Government, including improved maintenance support for full and part-time students.

22 A lack of funding to support living costs is a significant barrier to entry and success in higher education. This can be compounded by a lack of awareness about the scale and realities of costs, particularly relating to accommodation, that a student can expect. [Research from HEPI \(PDF, 2.69MB\)](#) has shown that fewer than half of prospective students think rent will be their largest non-tuition expense. The re-introduction of maintenance grants could have a significant impact on improving accessibility into higher education.

23 QAA manages 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. It transforms lives, and delivers real impact and value. The latest data show that the Access to HE Diploma continues to promote social mobility and widening participation. In 2016-17, over **24,000** Access applicants were accepted to higher education:

- **23%** were from low participation areas (compared with 13% of their peers with other qualifications)
- **32%** were from ethnic minority backgrounds (compared with 26% of their peers with other qualifications)
- **85%** were over 21 (compared with 21% of their peers with other qualifications).

24 Case study - Tommy Sharpe joined the Marines at 21 but had to leave after 12 years because of ill health. His life was the Marines, and he had no plans for his future. His experience in military hospitals had made him aware of the challenges faced by veterans in the care system. He'd left school with few qualifications but a call to a university pointed him to an Access to HE Diploma. 'I had very low confidence, believing that I didn't belong in the education system. The Access to HE course gave me self-belief...I didn't realise it at the time, but looking back on it, some of the problem in my lack of confidence came from not being very good at reading.' With the support of other students, he achieved his Access to HE Diploma and was able to take up the offer of a place to study social work at university.

25 The Department for Education's [2017-18 grant letter \(PDF, 312KB\)](#) (February 2017) to the Higher Education Funding Council for England secured funding for QAA's work in relation to regulating the Access qualification for this year. As the regulatory landscape continues to develop, QAA believes that this important qualification should be safeguarded and funded for the future, and is in discussions with the Department for Education, the Welsh Government and the Director for Fair Access and Participation at the Office for Students on this matter.

### **Part 3: Delivering the skills the UK needs**

26 QAA works with higher education providers, employers, students and professional bodies within the sector to develop and publish [Subject Benchmark Statements](#). There are currently 85 Statements, which set out expectations about standards of degrees in a range of subject areas, and covering bachelor's, master's and health professional awards. They define what can be expected of a graduate in terms of the abilities and skills needed to develop understanding or competence in the subject.

27 Enabling providers to address skills shortages quickly can be challenging. Currently, it takes around four years to get a new course in place and producing the first graduates. It is also important to have clear and early direction from employers to identify skills gaps and requirements, to enable providers to respond in a timely manner. In the context of higher education provided in further education colleges, their strong local employer links and collaborations can enable them to be more responsive.

28 QAA has also worked with representatives from the enterprise education community, to create guidance for UK providers to help students develop entrepreneurial skills that will be an asset to them in their future careers and to the UK economy. Feedback from providers shows that it is being used to shape their curricula, design and validate programmes in this area, and secure strategic and management buy-in for enterprise and entrepreneurship initiatives. At the beginning of this year we published an updated edition, [Enterprise and Entrepreneurship Education](#). The guidance has also been influential with

policy makers in the UK and internationally, including the Organisation for Economic Cooperation and Development, the United Nations Conference on Trade and Development and the European Commission. In response to demand in China - where all state universities are required to provide enterprise and entrepreneurship education - this has been translated into Chinese.

29 It will be important to continue to embed innovation, enterprise and entrepreneurship for students through the curriculum, and provide high quality placements, apprenticeships and other employability opportunities. By developing new and transferable graduate skills, the sector can also enable graduates to continue to adapt throughout their working lives.

## **Part 4: Value for money for graduates and taxpayers**

30 As the designated quality body for England, QAA is committed to working with the Office for Students to help it achieve its aims, including ensuring that all students, from all backgrounds, and with the ability and desire to undertake higher education, receive value for money.

31 From a quality perspective, value for money can be demonstrated through both the student academic experience and student outcomes. More broadly, it can also encompass areas such as learning gain or 'distance travelled' - the improvement in knowledge, skills, work-readiness and personal development a student can show at two points in time during their studies. Social mobility and widening participation are also factors in value for money.

32 For students, a significant component of value for money is the quality and standards of the teaching, learning and assessment practices in their academic experiences. A [recent report commissioned by the Office for Students \(PDF, 3.24MB\)](#) and produced by a consortium of student unions found provider quality measures - quality of teaching, fair assessment and feedback, and learning resources - are the top three factors that demonstrate that a provider offers good value for money. These measures come ahead of those directly focused on student outcomes, such as having access to industry connections or securing higher earnings than non-graduates.

33 QAA introduced student written submissions to its review methods in 2002. Today, student engagement in quality assurance and students as partners in their education is the norm in many higher education providers. QAA's 2017 longitudinal analysis of these submissions, [Taking the Long View of the Student Voice](#), demonstrated a clear link between the increase in tuition fees from £3,290 to an upper limit of £9000 in 2012 and the importance students place on receiving value for money. The study also found that students have remained concerned about contact time, assessment and the need for timely feedback. Teaching quality more broadly has emerged recently as a concern, as has 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.

34 Students' unions have repeatedly told QAA that the student written submission and an external review are some of the most significant opportunities they have to influence change in their institutions. As the designated quality body for England, QAA will seek to build opportunities in the new quality system for direct student engagement on a systematic basis, and undertake thematic inquiries on quality issues that matter to students.

35 Student and employer engagement in co-creating the curriculum, and in finding innovative ways to embed the development of skills and competences, should also promote

a greater sense of value for money. QAA's reviews of higher education providers have found:

- they generally work well with employers
- they have consistently shown a strategic commitment to (and investment in) students' employability.

36 QAA has a strong track record in developing student engagement. As the UK quality system develops we will be investigating better ways to include the employer and public interest voice in our work.

37 The influence of the Teaching Excellence Framework (TEF) should also be noted in discussions about value for money. As quality assurance and assessment in England will, in future, focus on baseline compliance, there will be an increased reliance on the TEF to be a primary driver for improving the academic experiences of students.

38 It is important that value for money is not forgotten for students studying overseas with a UK provider (transnational education or TNE). In 2016-17, there were 708,000 TNE students and it represents the main area of growth in UK higher education, in terms of student numbers. QAA undertakes the assurance of TNE for the UK sector, with a current review underway in Hong Kong, where 14 UK partnership arrangements have been selected for review and case studies. It's not yet clear how the quality assurance of TNE will evolve, when key data sources for UK students - such as NSS and DLHE surveys - aren't captured for those offshore. Overseas governments and regulators want assurances that UK overseas provision in their countries remains sound, so strategic international engagement, including the assurance of UK TNE provision, must ensure continued international confidence and recognition of UK qualifications in the future.

## Academic integrity

39 Recently, there has been an increased public focus on standards in higher education. Maintaining UK standards and academic integrity is a vital part of maintaining the world-class reputation of the sector and the value of the qualifications it awards.

40 Academic fraud is a worldwide problem and QAA is working with counterparts in other countries to tackle it. In October 2017, QAA published [guidance for the sector](#) aimed at combating the use of essay mills and contact cheating - where students pay someone to write their assignments for them. In March 2018, the Advertising Standards Authority upheld QAA's complaint about the essay mill company, UK Essays, stopping them from using misleading advertising.

41 QAA is also working with Universities UK and GuildHE on [protecting the comparability of degree standards](#), engaging with a wide range of other stakeholders. A final report on the project will be presented to the UK Standing Committee for Quality Assessment this autumn.

42 QAA will be strengthening its capacity to tackle these issues, working with sector partners to fight cheating and fraud in higher education, in all its forms.