



Department
for Education

Designation of a body to perform the assessment functions for higher education in England

Government consultation response

January 2018

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Introduction

In order to meet the relevant consultation requirements set out in the Higher Education and Research Act 2017 (HERA), the Department for Education, on behalf of the new Office for Students (OfS), sought views from respondents across the HE sector, including providers and students on the suitability of any particular bodies to perform the role of the Designated Quality Body (DQB) in the light of the statutory functions that it must carry out and the suitability requirements set out in HERA. The consultation followed an invitation for expressions of interest in the role which closed on 19 September, and to which one body - the Quality Assurance Agency (QAA) - provided a submission.

The consultation, published 19 October 2017, therefore explored the views of respondents on the suitability of the QAA to fulfil the role of the DQB, and on the suitability of any other organisation which consultees wished to suggest, which had not expressed an interest.

The responses to this consultation received both digitally and in formal written responses are now informing the OfS's decision-making on recommendation to designate the QAA and in design of its regulatory framework, which will be published by the end of March 2018.

Summary of responses received

Overall there was overwhelming support for the QAA as a body that is credible and suitable to fulfil the role of the DQB. Some concerns around the future shape and design of the DQB were expressed, but this was outweighed by general support for QAA to be designated the new Quality Body. No organisations were proposed as an alternative to the QAA.

Main findings from the consultation

To complement respondents' affirmation that the QAA is capable of meeting the designation conditions as set out in paragraph 4 of Schedule 4 to HERA, positive comments from sector bodies were submitted and are generally along the following themes:

- QAA is well-respected and has long-standing, extensive experience of assessing and supporting the development of the quality assurance systems and standards that underpin the UK Higher Education sector.
- QAA is recognised internationally as a highly capable, trustworthy and competent provider of quality assurance services.
- QAA has demonstrated its independence, as well as its commitment to engaging students and co-regulation, over more than twenty years.
- The QAA review methods have been developed and adapted to meet the needs of an increasingly diverse sector, including the use of peer reviews that has given QAA credibility within the sector. It has played a key role in the development of practice, for example through the development of the subject benchmark statements, provision of guidance for all providers in the sector and oversight of the UK Quality Code for Higher Education (UKQC). The QAA's recent approach to the consultation on a revised UKQC demonstrates an outcomes-based approach as well as a simplified model.
- QAA has experience of working with diverse institutions and has demonstrated understanding of the different types of provider within the sector and the need to adapt approach when working across the sector.
- QAA operates a governance structure which includes and ensures strong student engagement through student representatives and the student advisory committee.

Some concerns and issues were expressed regarding the future design and shape of the DQB and the quality system they will oversee if designated. These comments were wide ranging and related to:

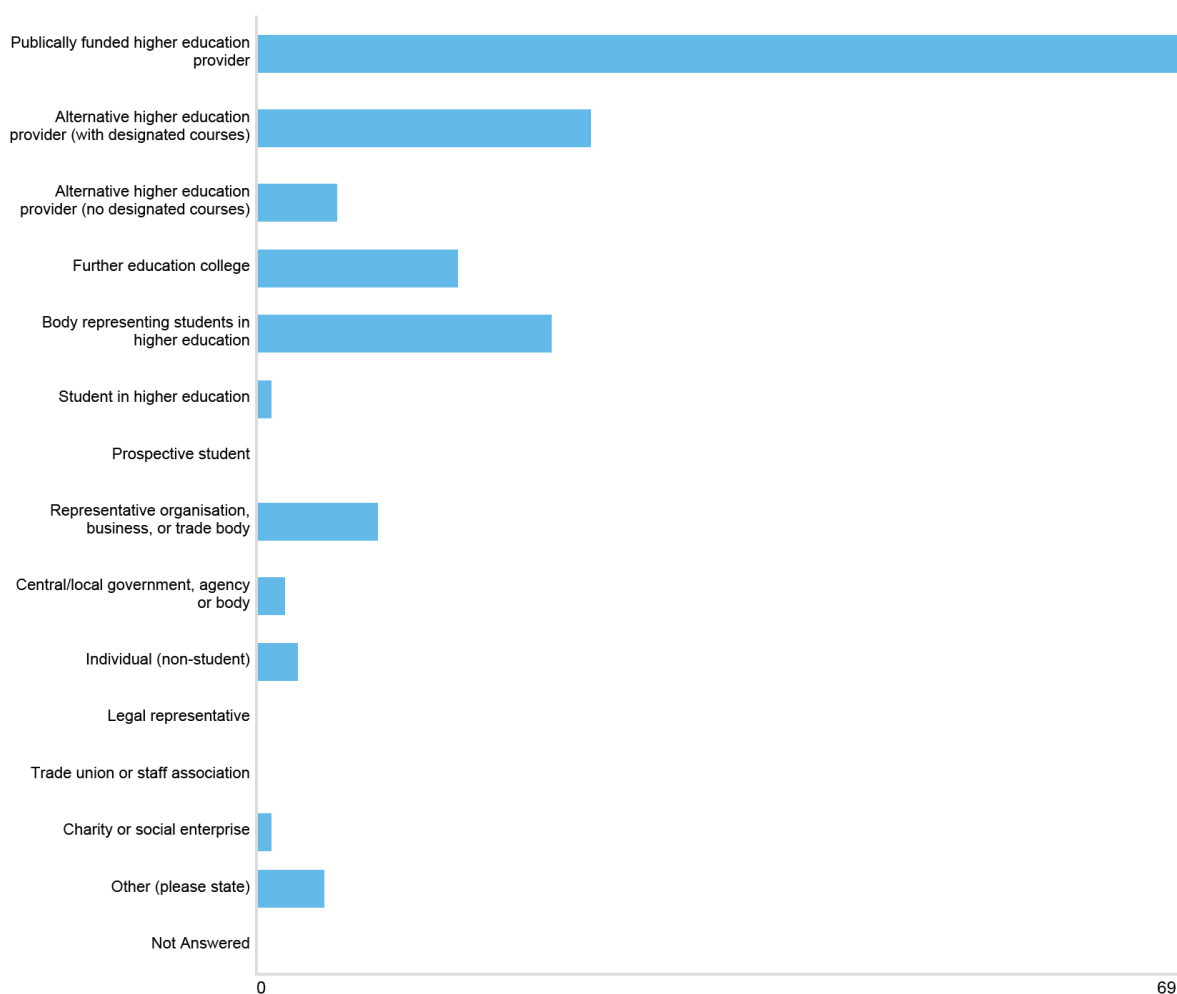
- Whether the DQB has the necessary capacity and capability to deliver the expectations of the OfS and whether it can transition to a new proportionate and risk-based approach.
- A need for the DQB to establish a robust quality system and process that takes into account contextual evidence, is flexible so that it can adapt to independent HE providers.
- Concerns that the DQB does not place disproportionate burdens on providers – in particular smaller Alternative Providers - and that any transitional burdens to a new Quality Review System are well managed. Duplication with other regulatory bodies should also be avoided.
- The DQB needs to be more representative of the sector - particularly encompassing Independent Higher Education in its layers of governance and is more reflective of the diverse Higher Education providers with and without Degree Awarding Powers (DAPs).
- The DQB will need to develop a robust process for the assessment of applications for DAPs if it is to support the OfS' objective of facilitating market diversification.
- Any fees charged by the DQB are proportionate, provide value for money for students and providers, and conflicts of interest are avoided.
- The DQB needs to be truly independent of the OfS and that greater clarity is needed about the precise role of the DQB in informing the decision-making of the regulator, particularly following initial registration of providers.
- Details should be published regarding the way in which the new OfS Quality Assessment Committee will work with the OfS and the DQB in order to provide advice on the exercise of the quality and standards function.
- The DQB should be a quality assessment body which can operate on a UK wide and international basis as the QAA currently function.

Question analysis

We asked respondents a series of questions on the DQB. Respondents could answer the questions digitally via the online survey or through written responses sent through to us via email or post. The following report is a factual summary of the responses received, which numbered 158 in total.

Questions 1-2

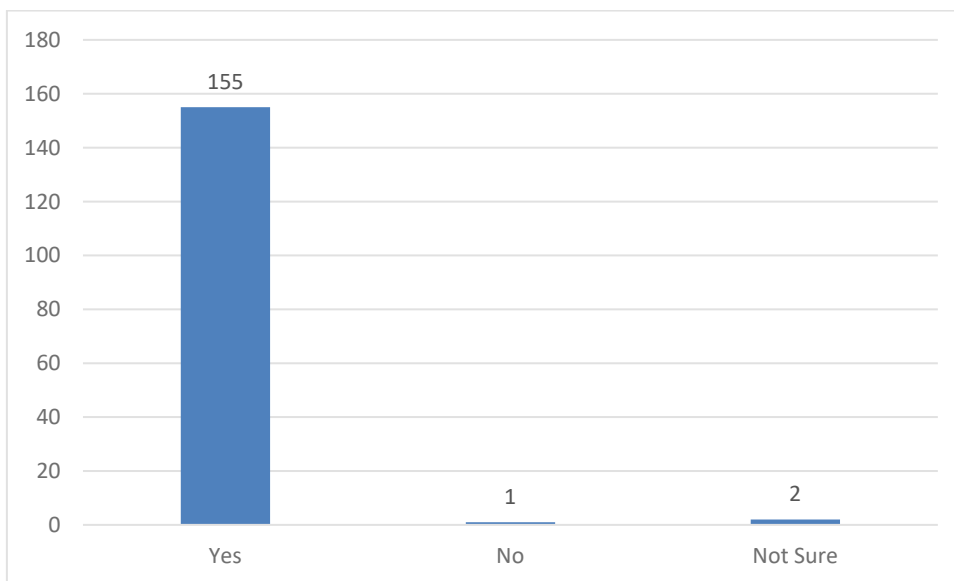
These questions invited the respondents to provide their names, organisation and location in order for us to explore the results by strata. The breakdown of respondents is contained in the chart and table, below.



Option	Total	Percent
Publically funded higher education provider	68	43.7%
Alternative higher education provider (with designated courses)	25	15.8%
Alternative higher education provider (no designated courses)	6	3.8%
Further education college	15	9.5%
Body representing students in higher education	22	13.9%
Student in higher education	1	0.6%
Prospective student	0	0%
Representative organisation, business, or trade body	9	5.7%
Central/local government, agency or body	2	1.3%
Individual (non-student)	3	1.9%
Legal representative	0	0%
Trade union or staff association	0	0%
Charity or social enterprise	1	0.6%
Other (please state)	5	3.2%
No response given	0	0%

Question 3

Please state whether, in your opinion, QAA is capable of meeting all of the designation conditions



Option	Total	Percent
Yes	155	98.10%
No	1	0.63%
Not Sure	2	1.27%

All except 3 respondents felt that QAA is capable of meeting all the designation conditions.

Question 4

If you believe that an organisation that did not submit an expression of interest would be more suitable for the role you can provide their details below, if you wish.

No suggestions were provided for an alternative organisation that would be more suitable for the Designated Quality Body role.

Next steps

The OfS will consider the responses to this consultation and provide a recommendation to the Secretary of State who will then make the decision. The OfS assessment will be based upon evidence from this consultation as well as any other relevant information. The OfS may request further information from QAA in order to assess suitability.

Annex A: List of organisations that responded to the consultation

- Academy of Contemporary Music, The
- Anglo-European College of Chiropractic University College
- Arts Educational Schools, The
- Arts University Bournemouth
- Askham Bryan College
- Association of Colleges
- Aston Students' Union
- Bellerbys Educational Services Ltd
- Birkbeck College
- Birmingham Metropolitan College
- Bishop Grosseteste University
- Bournemouth University
- BPP University
- Brit College
- British Accreditation Council
- Brunel University London
- Burnley College
- Cambridge Education Group
- Cambridge University Students' Union
- Christ Church Students' Union
- City University of London
- De Montfort University
- Durham University
- Edge Hill University
- Edge Hill Students' Union
- Foundation for International Education
- GuildHE
- Harper Adams University
- Hartpury College

- Hartpury Students' Union
- Hereford College of Arts
- Higher Education Funding Council for Wales
- Huddersfield Students' Union
- Imperial College London
- Independent Higher Education
- Institute of Cancer Research, The
- Institute of Contemporary Music Performance
- INTO University Partnerships
- Kaplan International Pathways
- Kensington Education Foundation Limited
- KLC School of Design
- Lancaster University
- Lancaster University Students' Union
- Leeds Trinity University
- London Academy of Music and Dramatic Art
- London Institute of Banking & Finance, The
- London Metropolitan University
- London South Bank University
- London Studio Centre
- Loughborough University
- Manchester Metropolitan University
- MillionPlus
- Myerscough College
- Middlesex University
- Milton Keynes College
- Mixed Economy Group of Colleges
- National Union of Students
- Newbold College of Higher Education
- Newcastle University
- NCG

- North Hertfordshire College
- North Lindsey College
- Norwich University of the Arts
- Nottingham Trent Students' Union
- Nottingham Trent University
- Open University, The
- Pearson College London
- Pearson Education
- Prince's Foundation for Building Community
- Reading University Students' Union
- Richmond, the American International University in London
- Roehampton University
- Royal College of Veterinary Surgeons
- Russell Group, The
- SAE Education Limited
- Salvation Army (William Booth College), The
- Scottish Funding Council
- Scottish Government
- School of Oriental and African Studies Students' Union
- Sheffield Hallam University
- Sheffield Hallam Students' Union
- Southampton Solent University
- South Devon College
- St George's, University of London
- Student Engagement Partnership, The
- Student's Union University of Bath, The
- Students' Union University College London
- Sunderland College
- Truro & Penwith College
- UK Council for Graduate Education
- University College of Estate Management

- University College of Football Business
- Union of Brunel Students
- Union Manchester Metropolitan University, The
- Universities UK
- University Alliance
- University for the Creative Arts
- University of Bedfordshire Students' Union
- University of Bolton
- University of Brighton
- University of Central Lancashire
- University Centre Weston
- University of Chester
- University of Chichester
- University of Cumbria
- University of Edinburgh
- University of Essex
- University of East Anglia
- University of East London
- University of East London Students' Union
- University of Exeter
- University of Huddersfield
- University of Kent
- University of Law, The
- University of Leeds
- University of Leicester
- University of Leicester Students' Union
- University of Lincoln
- University of Nottingham
- University of Portsmouth
- University of Reading
- University of Sheffield

- University of Sheffield Students' Union
- University of Southampton
- University of St Andrews
- University of St Mark and St John
- University of Stirling Students' Union
- University of Suffolk
- University of Sussex
- University of Warwick
- University of Winchester
- University of Westminster
- University of Wolverhampton
- University of Worcester
- University of York
- Uxbridge College
- Waverley Abbey College
- Worcester Students' Union
- Yeovil College University Centre
- York St John Students' Union
- York St John University

A number of individuals/organisations requested their responses were kept confidential.

Annex B: QAA Expression of interest for the role of the Designated Quality Body



Expression of Interest: the Quality Assurance Agency for Higher Education

Designation of a body to perform the assessment functions for higher education in England

The Quality Assurance Agency for Higher Education (QAA) welcomes the opportunity to present this expression of interest. Building on two decades of experience, QAA is ready to work with its partners and stakeholders to ensure the UK continues to benefit from an independent, internationally respected and forward-looking system of quality assurance.

QAA is the UK's independent, expert, higher education quality agency and is a registered charity and not-for-profit organisation. Established in 1997 through [agreement of governments, funders and the sector](#), QAA has co-regulation embodied in its governance and operations. QAA was referenced in the 2016 higher education White Paper, [Success as a knowledge economy](#), as underpinning the UK sector's international reputation for quality.

QAA safeguards standards, and drives quality assurance and enhancement for all providers of higher education. Students play a key role in its governance and are involved in all of its activities.

Since its foundation, 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's capacity, expertise and experience demonstrate that it is the most capable and qualified organisation to perform the functions of the designated quality body in an effective and cost-efficient manner, and to lead the future direction of UK higher education quality assurance.

QAA's track record provides the evidence of its capability to perform the assessment functions presented in the *Higher Education and Research Act 2017*. QAA meets all conditions for designation as set out in the Act.

1. Capability to assess the quality of, and the standards applied to, higher education

1.1. Assessment against initial registration requirements

Over the past two decades, QAA has designed, managed and developed the UK-wide expectations for quality on behalf of the sector (the [UK Quality Code for Higher Education](#) and the UK Frameworks for Higher Education Qualifications - FHEQ and FHEQIS), to assess applicants' quality and standards for initial registration as higher education providers.

QAA's capability and experience in assessing the quality of, and standards applied to, applicants' higher education provision is unrivalled. QAA also has [cooperation agreements](#) with a range of other regulators operating in UK further and higher education, to maximise efficiencies.

QAA's ability to innovate was demonstrated in its design in 2016-17 of the method for Quality Review Visits, a new gateway process for entry into higher education in England and Northern Ireland. 30 reviews were completed and 20 providers achieved successful outcomes. QAA will work alongside the Office for Students (OfS) to develop processes for entry to the register that align with the wider regulatory approach.

QAA supports the government's ambition to facilitate the entry of new, innovative, high quality providers to higher education in England. Since 2012, QAA's work has aligned with the requirements of both the Home Office and Department for Education, reviewing providers wishing to obtain course designation and/or Tier 4 licences. QAA sets a high bar, recognising and supporting high quality provision, and safeguarding student interests and the reputation of the sector from those that do not meet UK expectations. Of the 462 alternative providers that initially engaged with QAA review, 218 achieved successful review outcomes.

As the designated quality body, QAA would bring significant expertise in undertaking quality assessment for new entrants and safeguarding the reputation of the sector.

1.2. Assessment against ongoing registration requirements

QAA would draw on its substantial experience of assessing quality and standards to confirm to the OfS that providers meet ongoing registration conditions. QAA would advise and work with the OfS in designing and delivering a proportionate, risk-based approach to assessment, addressing issues as they arise.

QAA's agility in responding to changes in the policy landscape and development of new methodologies has been demonstrated repeatedly, including: the introduction of the revised models for quality assessment in England and Northern Ireland; the revised method of Enhancement-led Institutional Review in Scotland; and the new Quality Enhancement Review method for Wales.

QAA has made a significant contribution to the government's Teaching Excellence Framework (TEF) from the outset and to its continuing development, working closely with HEFCE to manage the assessment process for 299 providers in TEF Year 2.

QAA has pioneered student engagement in quality and standards, and its approach has been commended internationally. Students are embedded in QAA's governance, with two student members on its Board, and a Student Advisory Committee providing strategic input on developments in the higher education sector. QAA is committed to ensuring students are involved and empowered in shaping their learning experiences and provides opportunities for students and student bodies to do so in review and assessment methods. QAA expects providers to embed student involvement in their quality arrangements and would ensure students continue to be central to the regulatory framework.

'QAA is to be commended for its broader approach to ensuring very active student engagement in all key aspects of its work.'

[Final ENQA report](#) on its 2013 review of QAA

QAA would work with the OfS to safeguard the interests of students, addressing weaknesses in the management of academic quality and standards. For England and Northern Ireland, QAA already undertakes investigations referred to it under the Unsatisfactory Quality Scheme. For Scotland and Wales, and for all UK alternative providers, it operates its own [Concerns Scheme](#). From 2012-16, QAA dealt with almost 2,000 general

enquiries and handled 322 cases. Improvements made as a result of the Scheme have had a direct and positive impact on the academic experiences of students and providers.

1.3. Guidance for higher education providers

QAA has proven experience in delivering effective advice and guidance for higher education providers. It has developed, consulted on and published handbooks and related guidance for reviews, and briefings on other quality and standards issues. During 2016-17, QAA's published guidance included review handbooks for transnational education, Quality Review Visits, and new methods in Scotland and Wales. It uses new technologies and methodologies such as podcasts and webinars to disseminate its findings and to engage with the sector in a cost-effective way, enabling targeted messaging to relevant groups.

QAA has worked with the sector to develop, maintain and review the UK Quality Code and associated guidance that is accessible for providers and other stakeholders. This has included: case studies on using the Quality Code in practice; workshops; guidance for non-technical audiences; toolkits for specific groups (such as colleges); and the development of online tools. QAA is currently working with the sector and the UK-wide Standing Committee on Quality Assessment to revise the Quality Code.

QAA has been a significant contributor to recent major policy developments including: advice and guidance on the TEF; higher and degree apprenticeships; accelerated degrees; credit frameworks; and tackling plagiarism and essay mills.

QAA publishes thematic analyses on wider trends and good practice. Its online Knowledgebase includes 3,148 examples of good practice, 5,548 recommendations and 415 affirmations from its reviews since 2009. Feedback from QAA subscribers has led to work on topics including student transitions and the role of student satisfaction data in quality assurance and enhancement.

2. Advice on degree awarding powers

Since its foundation, QAA has provided expert advice to UK government and all devolved administrations on applications for degree awarding powers and university title. Its advice has led to 80 successful applications since 2004. QAA works with potential applicants to improve their understanding of the requirements and expectations associated with applying for degree awarding powers.

The process of applying for, and granting, degree awarding powers has evolved over time. QAA has advised government on revisions to the criteria and, more recently, the publication of scrutiny reports and the inclusion of student members on all review teams. QAA is already working on methods to integrate registration and application for probationary degree awarding powers, to simplify the process for new applicants.

Detailed scrutiny of the evidence provided by an applicant is undertaken by peer assessment. The independent [Advisory Committee on Degree Awarding Powers](#) (ACDAP) considers the outcomes from peer assessment, together with the evidence submitted by the applicant, and makes recommendations to QAA's Board, which then determines the nature of advice to be provided.

ACDAP has evolved, for example with the addition of a student member in 2014, and on 7 September 2017 it recommended changes to its membership to ensure alignment with the Act's requirements. The committee also recognised the need for reform of its processes and has commissioned a review to ensure these are fit for the new regulatory environment.

3. Sector-wide representation

QAA's strategic priorities are determined by its [Board](#). All 18 Board members are unpaid non-executive directors and are trustees for the purposes of charity law. The Board structure embodies co-regulation, representing all sections of English and wider UK higher education, including students, universities, further education colleges and alternative providers, with a rich mix of skills and experience. The six independent Board members, with their expertise in industrial, commercial, financial and professional practice, provide an external perspective that furthers the Board's public interest remit. The independent directors are the largest group, ensuring that no one sector interest can dominate. The Chair of the Board must be an independent director.

QAA regularly reviews its governance arrangements to ensure the Board operates in line with best practice and charity law.

4. Confidence of higher education providers

4.1. Confidence at the point of designation

QAA is respected and trusted as the UK's independent quality body, both nationally and internationally. Its work commands the respect of the sector because it is developed and shaped with and by the sector, students and other key stakeholders. QAA works with over 600 providers including universities, colleges and alternative providers, giving it unparalleled knowledge, experience and insight across the full provider range. QAA engages strategically and operationally with the sector, its representative bodies, mission groups and individual providers of all types.

'In terms of the quality and regulation landscape, there is widespread recognition of the significant role that the QAA has long played in the sector, and the importance of co-ownership of the quality regime...'

[Report of the Universities UK Review Group on UK Higher Education Sector Agencies \(January 2017\)](#)

QAA is an international leader, influencing key areas of policy including the Bologna Process, the European Standards and Guidelines for Quality Assurance, and the qualifications frameworks for the European Higher Education Area.

QAA's case to become the designated quality body for England is officially supported by, and has the confidence of, the following bodies:

Association of Colleges
GuildHE
Independent Higher Education
National Union of Students
Universities UK.

QAA commands the confidence of the wider UK sector, demonstrated through separate agreements this year with Universities Scotland and Universities Wales to exclusively undertake external quality assessments of their higher education providers until 2023.

This facilitates coherence and QAA is uniquely positioned to unify approaches to quality across the four nations.

QAA is responsible for assuring transnational education (TNE) for the UK sector, underpinning its world-class reputation. It has undertaken 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 has been internationally recognised through recent awards from [INQAAHE](#) and the [Asia-Pacific Quality Network](#).

4.2. Maintaining confidence in the spirit of co-regulation

QAA was created as a key partner in the system of co-regulation. To maintain the confidence of the sector and the OfS, as the designated quality body QAA would continue to be:

Expert and authoritative

World-class

Innovative and responsive

Driving UK-wide consistency of higher education standards

Not-for-profit and mission-led

Independent and accountable

Collaborative

Committed to working with and for students

Cost-efficient and effective.

QAA would maintain sector confidence and dialogue through its Board, advisory committees, sector Sounding Board, annual subscriber surveys, networks, events and consultations. QAA's provider liaison programme enables it to exchange intelligence and ideas, and facilitate invaluable insights into the needs of providers. QAA's staff have great breadth and depth of expertise, and its reviewers are drawn from senior staff across the entire sector.

'As well as discharging statutory requirements on behalf of HEFCE (mainly around quality assessment), the sector works with the QAA to support and develop quality assurance and the academic infrastructure within institutions, recognising that ultimately the standards and quality of higher education rest primarily with autonomous institutions... This is a widely admired self-regulatory approach that is unique to the UK and fundamental to the maintenance of academic standards.'

*Quality, equity, sustainability: the future of higher education regulation,
[Report of the Universities UK Regulation Task and Finish Group](#) (February 2015)*

QAA is a company limited by guarantee and a registered charity. It does not have constitutional links with government or individual higher education providers.

Whilst independent, QAA listens carefully and responds to its full range of stakeholders in developing its plans and quality assurance processes.

We confirm that, in respect of Condition D for designation in the *Higher Education and Research Act 2017*, QAA is a body corporate, and not a servant or agent of the crown, or a body to which the Secretary of State appoints members.

'This is the hallmark of the QAA - that they work in partnership with the sector and, indeed, in partnership with government. But they maintain a sufficient distance and they are known to be independent, and this is the essence of the reputation of UK higher education. There is a secure regulatory foundation and set of guidelines in the [Quality] Code, but the QAA is independent and therefore to be trusted.'

*Professor Janet Beer, Vice-Chancellor, University of Liverpool,
and President, Universities UK (May 2017)*

QAA's internal safeguards ensure the integrity of decision making. Judgements from reviews are made by teams of independent peer reviewers, following published process and their judgements cannot be influenced, other than at appeal. It has robust mechanisms and policies in place to ensure that those undertaking work on its behalf act in a fair and impartial manner. All QAA reviewer contracts include a code of practice, and copies of its ethical conduct and anti-bribery policy, to prevent conflicts of interest.

As a founding member of the European Association for Quality Assurance in Higher Education (ENQA), QAA is reviewed every five years to ensure it meets [European Standards and Guidelines](#), including being fully compliant with the independence requirement. The expert panel from QAA's most recent review in 2013 reported:

'QAA's overall performance against the standards of the ESG [European Standards and Guidelines] is uniformly high. It is a trustworthy, effective and highly credible agency and a leader in the field.'

[Final ENQA report 2013 review of QAA](#)

As a forward-looking, strongly stakeholder-focused organisation, QAA will continue to develop its deep understanding of both individual providers and the sector. Its approach embodies co-regulation, embedding the autonomy, expertise and academic freedom of UK providers, while ensuring that stakeholders in higher education, including students, continue to be partners with roles to play.

5. Fees

QAA is highly experienced in ensuring transparent separation of different funding streams and their allocation, and already meets this requirement through its work with the UK's funding bodies, the Home Office and Department for Education (see section 6). Taking account of [Treasury guidelines](#), QAA would ensure clear and transparent separation of fees and charges for the performance of statutory and non-statutory functions, by publishing a statement of the fees it charges and the basis on which they are calculated. QAA would work with the OfS and the sector to determine what would be chargeable as statutory functions.

QAA manages a complex financial portfolio with a variety of funding arrangements across the UK and internationally. It is experienced in providing detailed analysis to the funding bodies on its method for allocating charges. This provides confidence in QAA's financial management and that it delivers value for money. There is no cross-subsidy of any non-statutory functions by statutory ones. By generating additional revenues, QAA acquires economies of scale. Where it undertakes other contracted activity, this is aligned with its charitable objects as set out in its [Articles of Association](#).

6. Reporting, governance and accounting arrangements

QAA operates a robust system of corporate governance and accounting practices.

The Board governs QAA in line with its Articles of Association, vision, mission, values, aims and charitable objects. The Board is responsible for compliance with legal and statutory requirements and with the published [Code of Practice](#). QAA is regulated by the Charity Commission for England and Wales and the Office of the Scottish Charity Regulator.

The Board is supported in its decision making by its [governance and advisory committees](#). New Board members attend an induction programme covering the work of QAA, governance, operations and strategic plans. Guidance is provided on their responsibilities and good practice as charity trustees.

Day-to-day management of QAA is delegated by the Board to the [Chief Executive](#) through a scheme of delegation and financial regulations. Rigorous planning and reporting processes are in place, giving the Board confidence that QAA is being managed effectively.

QAA has a strong track record in internal and external audit. Internal auditors report three times each year to the Audit and Risk Committee on their findings. This informs the Committee's annual opinion to the Board on arrangements for risk management, control

and governance, and for economy, efficiency and effectiveness (value for money).

QAA publishes and monitors a reserves policy as part of the published annual reports presented to its annual general meeting of members. This provides financial stability to ensure it can deliver the requirements of the OfS and the sector. An Honorary Treasurer provides assurance to the Board on the financial aspects of QAA's work.

QAA is a not-for-profit organisation, robustly accountable for the delivery of its work programmes, with significant experience in producing annual reports for the UK funding bodies and their advisory committees.

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Department
for Education

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