

Simplifying Access to the Market: Degree Awarding Powers and University Title

Response to Government Consultation by Independent Higher Education – December 2017

Introduction

Independent Higher Education and our members welcome the opportunity to respond to the consultation *Simplifying Access to the Market: Degree Awarding Powers and University Title*. It is critical that government bring the Degree Awarding Powers Framework in line with modern higher education delivery, and in particular that it is integrated with and reflects the new risk based quality review model. This consultation marks a significant opportunity for England to continue to promote high quality university degrees while also meeting the challenges that face higher education in the 21st century. We support the expansion of Degree Awarding Powers to encompass more providers, and to facilitate degrees in unique, innovative and specialist providers where previous processes may have been prohibitive.

We welcome the creation of New DAPs but feel strongly that it should not present a comparative advantage for new providers over those with a track record. We fully support an alternative model which ensures that those providers with a track record can access the same initial assessment which would allow them to award degrees while scrutiny is ongoing. We believe that those with a track record, who will also often have an existing validator, have appropriate safeguards to be granted the same immediate access to DAPs as those who apply within the New DAPs process. We outline this proposal below.

We remain concerned that the consultation proposals for those applying for DAPs with a track record do not seem to have departed from the present and now antiquated system, which current guidance suggests will take 12-18 months to complete and is run over an academic year. It is essential that the scrutiny for 'track record DAPs' take advantage of the considerable amount of information held by the OfS and their assessments of risk already undertaken. We would expect that coordination of the DAPs process by OfS would shorten the current scrutiny process and ensure it is less costly. We also do not see the need to ensure scrutiny is undertaken over an academic year if sufficient information on outcomes and standards is available for past academic years. The scrutiny process for subject and level DAPs and for smaller providers, should be shorter and more streamlined again, relevant to the provider and award being granted.

Our proposal for ensuring equal access to DAPs after initial assessment

The New DAPs model suggests a two-stage process which we believe should be extended across all of the DAPs processes, and be paired with an appropriate level of scrutiny to the amount of track record and evidence a provider can establish.

The first stage of application for both New DAPs and track record DAPs would consist of a review of the provider's plans and processes for meeting the conditions of DAPs. It should be completed within the 3 to 4-month timeline outlined and should finish with an assessment of the provider's ability to award degrees and their risk as they enter the scrutiny period. In both the New DAPs

model and the track record DAPs model, the provider should then be able to award their own degrees from the end of that assessment.

Where the provider has a track record of delivering degrees, and ample evidence to support scrutiny, the scrutiny period is expected to be undertaken as current guidance suggests, but with amendments to encourage an efficient use of data and information which should make the process shorter while maintaining a high bar for quality.

Where the provider has no track record, we would expect the scrutiny period to last four years, in order to assess the degree outcomes as a critical part of the evidence required. While this evidence will become available at the end of the third year, we expect the OfS to take the time to consider this most crucial evidence and take a decision in the fourth year. These providers must take the time to amass the evidence required to match that provided by those with considerable experience and track record. New DAPs can provide a viable alternative to validation for those where it is not appropriate, but the OfS must also ensure that before full, time-limited DAPs are granted, there is ample evidence of delivering quality and high standards for the scrutiny panel to assess.

We expect the cost for the DAPs process to vary according to size and subject and in line with the OfS' responsibilities to encourage new and innovative provision. Costs should not be prohibitive to smaller providers. We also expect a phased approach to fees to be implemented, acknowledging the additional role OfS will play in accepting applications and re-applications. Where an application is not accepted on first review, the full fee for the DAPs process should not apply. Similarly, if the initial application is not accepted prior to scrutiny, the provider should not have to pay for the scrutiny process.

Proposal for DAPs for providers with a proven track record

Following a 3-month initial review, if successful, established providers *with a proven track record* who meet the initial requirements would be awarded 3-year time-limited DAPs. A scrutiny process would begin and run concurrently to the time-limited DAPs process, allowing these providers to have the same access to initial DAPs as new providers.

To minimise risk, in year 1, only their first-year students might be enrolled on their own DAPs; 2nd and 3rd year students could be 'taught out' on the existing validated relationship. In year 2, there could be two cohorts following the new academic framework with only the third year being 'taught out'. This model could be used to lower risk as assessed in the initial assessment.

Scrutiny would take place during years 1 to 2, i.e. well before a cohort following the new framework graduates. A decision on the award for DAPs would be made ideally before the beginning of year 3, which would allow plenty of time for scrutiny and consideration of a decision and enable the provider to properly communicate with its students. If unsuccessful, either the existing awarding body could step back in and make the final awards (which could be agreed beforehand in the validation agreements and clearly laid out in the initial assessment), or the OfS as validator of 'last resort' could do so, thus minimising risk to students. We expect there would be clear indicators during the scrutiny period that would suggest whether an application was going to be successful or not.

Following this process, the provider could apply for University Title (UT) following the proposed process rather than having to deliver a further 3-year period before being allowed to make such

an application. This would of course be an advantage over new providers, but would properly recognise the track record and proven experience of certain established providers and the considerable amount of evidence available during the scrutiny period. The criteria for track record and proven experience could be easily defined to provide guidance and ensure the bar to entry is suitably high.

Overall, this would enable an existing provider with a proven track record to potentially achieve Indefinite DAPs and UT within a period of 4-5 years maximum. Obviously sufficient time must be built in at the beginning of the process to enable clarity of communication to incoming and existing students, to ensure they are clear about and can make informed decisions on the changes to the awarding body.

FIGURE 1: DAPS VIA TRACK RECORD

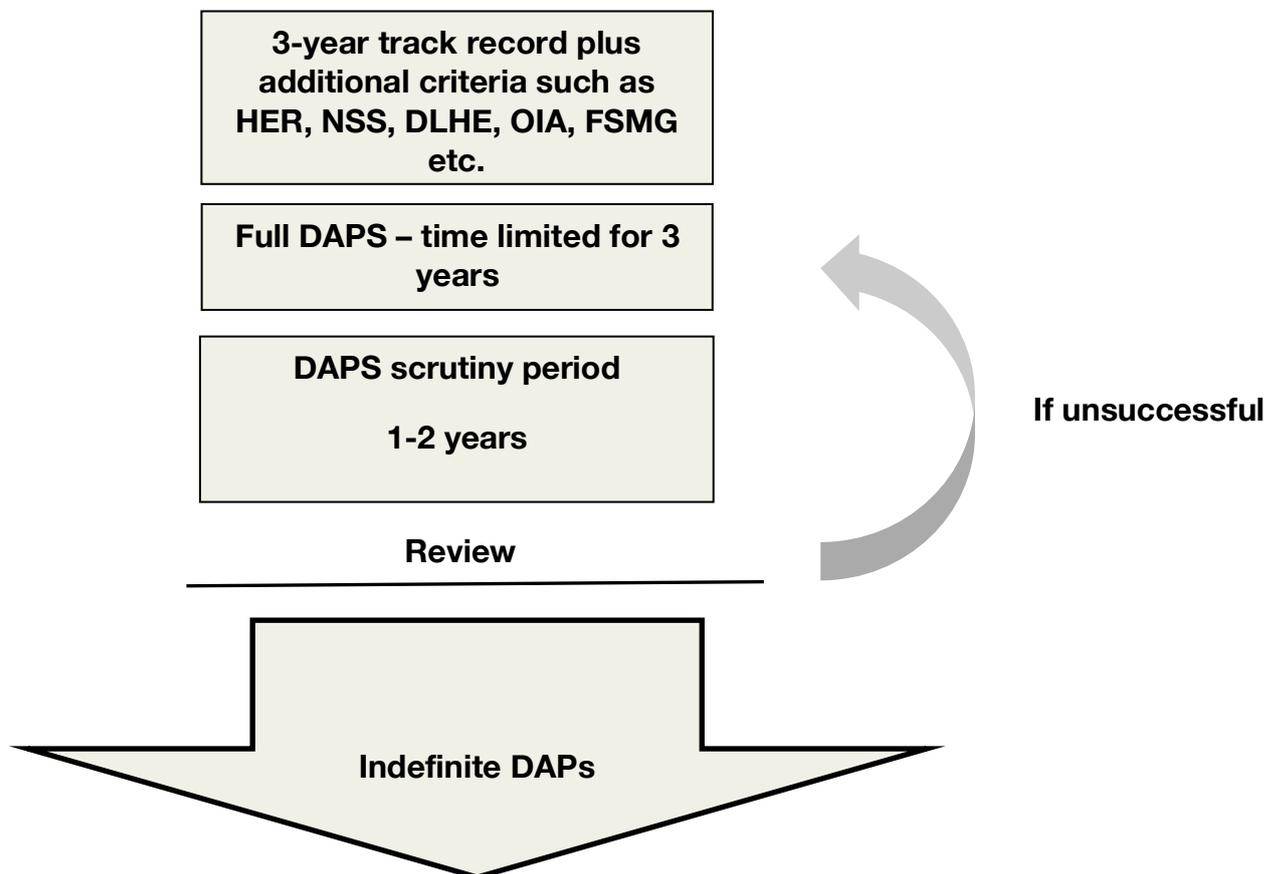
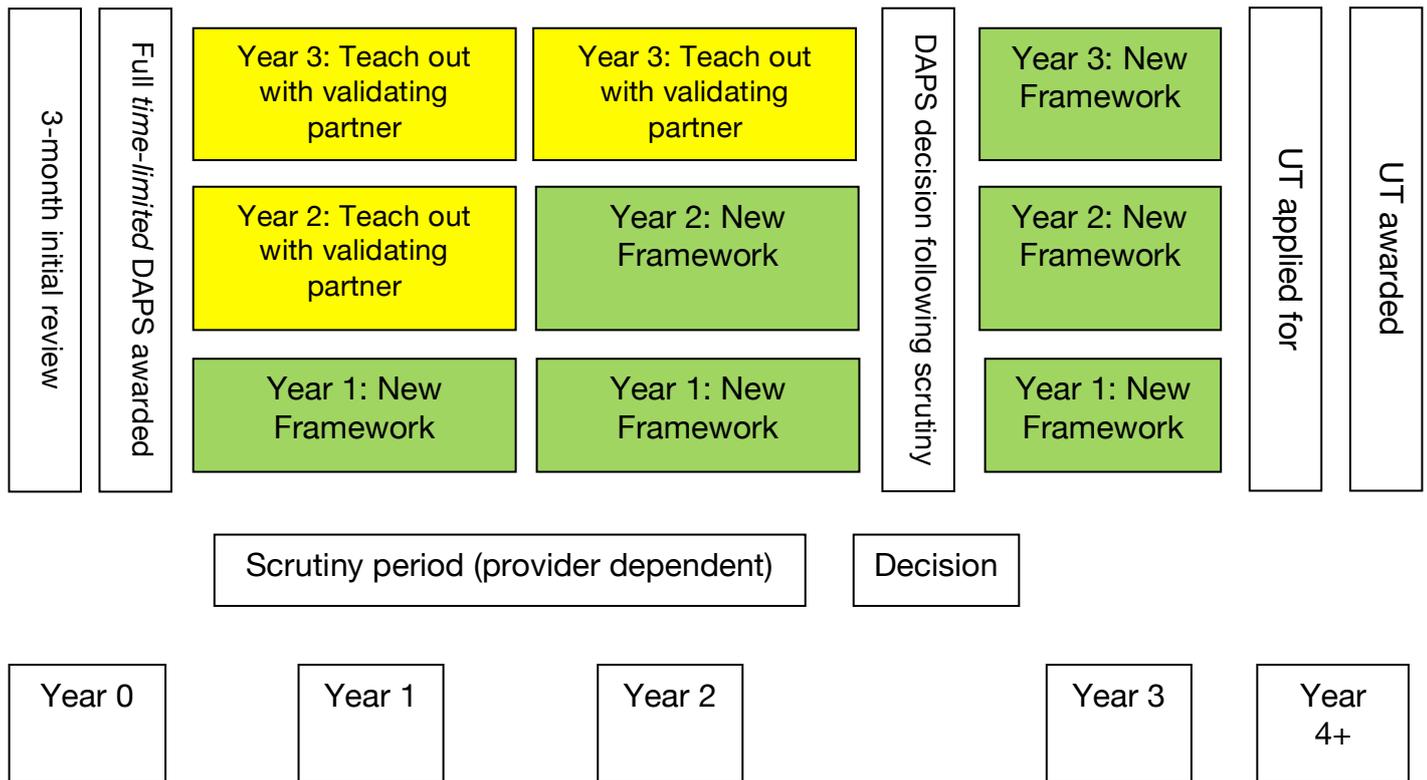




FIGURE 2: MORE DETAILED REPRESENTATION OF ROUTE TO DAPS AND UT FOR ESTABLISHED PROVIDERS WITH A PROVEN TRACK RECORD



CONSULTATION QUESTIONS

PART 1: Degree awarding powers

Question 1: Do you agree or disagree that the OfS should consider applications for New DAPs for research awards from providers without a three-year track record of delivering higher education in England?

Strongly agree

No provider should be forced into a validation agreement where it is not needed or appropriate. If the New DAPs provision is not extended to research awards, the problems which prompted the creation of New DAPs for taught awards will remain for research awards. We would expect a high bar for passing the initial assessment and we would expect there to be measures which the OfS could use to mitigate risk, such as a backup validation process for student awards if needed. However, we can see no valid argument for withholding research awards from the New DAPs process.

While we support the proposals for new DAPs for research awards, we would want to ensure that, like TDAPs, new providers do not gain a regulatory advantage over existing providers with a track record of delivery. We outline a proposal to rectify the imbalance in the process outlined by the consultation in a later question.

Question 2 (with reference to question 1): Are there particular circumstances where authorisations of this type would be appropriate? If so what are they?

Yes

Overseas providers with experience of delivering research awards in their home country should be able to use an initial assessment to show how they would adapt their model to the UK context and criteria. Where a new venture is formed from partners or staff with considerable experience of delivering and awarding research awards, they should be given access to the initial assessment process of New DAPs to show that they can deliver this award.

Where a domestic provider has extensive experience of delivery of higher education, and in particular, where they have matched their own awards to level 7 or 8 but have not had the necessary validation or franchise arrangements to establish a track record, they too should be able to apply for New DAPs for research awards and face the same scrutiny process as an overseas provider.

Question 3: Do you have any comments on the proposed New DAPs test and associated processes? In particular, do you think these tests and processes provide appropriate safeguards whilst enabling high quality new providers to access DAPs?

Slightly agree

The New DAPs model suggests a two-stage process which we believe is a sensible approach and should be extended across all of the DAPs processes. The New DAPs initial assessment is right to focus on establishing a clear potential and commitment to meet standards, consisting of a review of the provider's plans and processes. It should be completed within the 3 to 4- month timeline outlined and should finish with an assessment of the provider's ability to award degrees and their risk as they enter the scrutiny

period. There is no reason why this process could not be applied in both the New DAPs model and the track record DAPs model.

In both the New DAPs model and the DAPs model for those with a track record, the initial assessment is followed by a scrutiny process. For those with a track record this process will be completed much more quickly as they have the student data, and specifically the final year student data, to put through their processes and demonstrate in scrutiny that they can award their own degrees successfully. It is right that a New DAPs provider should have a longer length of monitoring and scrutiny as such a provider must gather the data, and crucially the final year student data, to put through their processes in order to show the scrutiny panel that these processes will lead to the expected standards and quality of award.

Given that scrutiny can be completed concurrently with awards for the New DAPs process, there is no reason why it could not be undertaken for the track record process. In both cases the provider should then be able to award their own degrees from the end of the initial assessment.

Where the provider has a track record of delivering degrees, the scrutiny period is expected to last up to 12-16 months, similar to what the current guidance suggests. Where the provider has no track record, we would expect the scrutiny period to last four years in order to assess the degree outcomes as a critical part of the evidence required. A decision on time-limited DAPs should not be made in year 3 but after the year 3 students have achieved a degree outcome. While this evidence will become available at the end of the third year, we expect the OfS to take the time to consider this most crucial evidence and take a decision in the fourth year.

Our members who would undertake the DAPs process for those with a track record have not indicated any issues with applying certain restrictions for the period in which scrutiny is taking place. This could include:

- Entitlement to make awards to students only in the programme areas included in their probationary plan, including intermediate awards for students who want to exit before the completion of the award in question.
- No entitlement to validate or franchise provision to other providers under section 43(1) of HERA.

We expect the New DAPs test to have a high bar for not only the analysis of the provider's probationary plan and supporting evidence, but the evidence that they have the resources and experience within their staff and institution to maintain processes to ensure standards over the period of monitoring and scrutiny.

We expect that the majority of applications for New DAPs will come from providers already delivering higher education in the UK but who are:

- delivering at level 6, want to reach the Degree Awarding Power stage earlier, and are comfortable with opting for the longer scrutiny process; OR
- delivering higher education without a validator or franchise provider and will therefore need to choose New DAPs because their experience, however considerable, will not make them eligible for any other route to DAPs.

With these two types of providers in mind, the New DAPs model must have a way of incorporating evidence of teaching experience into the assessment as we expect these providers to be much lower risk than those starting new with no students, and with no brand reputation. It may be that much of this evidence can be considered equal to validation or franchise and would enable a provider to undergo the

track record route. This should be established in the initial assessment on the merit of these different types of track record and the evidence of them.

Question 4: Do you consider the proposals for monitoring a provider with New DAPs during the probationary period to be adequate and appropriate?

Yes

It is important that monitoring specific to the DAPs criteria be undertaken. We expect the OfS to apply greater scrutiny to the student metrics which are received from providers undergoing a New DAPs process in order to identify early any concerns for students. However, these measures cannot produce the evidence needed to evaluate other criteria, for example academic community, much of the academic governance criteria and of course the evaluation of performance, which the criteria suggest would have an enhancement element to “develop further its strengths.” Specific monitoring for DAPs criteria must be applied.

We remain concerned that the process for initial assessment and the advice from the Designated Quality Body may still come from a committee which looks and feels much like the current ACDAP body. This type of static body focused on the experiences of individuals who may not be familiar with the subject, level, delivery model or corporate and academic governance of the providers seeking New DAPs or indeed track record DAPS, will not facilitate the kind of modern, streamlined and progressive DAPs process that the government hopes to create. We would welcome proposals which would encourage a more panel-based approach for the monitoring and scrutiny processes, with a panel which reflects the type of provider under scrutiny, the subject (if applicable) of DAPs being tested, and the level of DAPs being tested. Panels would encourage more subject knowledge for subject level DAPs and more appropriate industry engagement, especially where vocational providers are looking for an interdisciplinary approach to their subject. They would also engage a much wider group of individuals from the lists outlined in the consultation, and lower the risk that committee members would be unable to identify with the innovative models presented by the providers.

More thought needs to be given on how to protect students should the provider fail monitoring and scrutiny processes, and at what point failure could be identified. We would expect a clear plan to be included in the initial assessment. Where a validator exists there should be the opportunity for this partnership to help mitigate risks and be integrated into monitoring. Where no validator exists we would expect a suitable alternative to be identified, up to and including the OfS providing validation or a higher level of monitoring and scrutiny which would identify problems early enough in the process for them to be fixed or for students to be moved on to other providers’ awards. We also feel that where shortcomings identified through monitoring are serious, in particular if they would have caused concern where they identified in an existing DAPs provider, the OfS should be able to intervene and remove DAPs where necessary to protect students.

We welcome the inclusion of regulatory intelligence from the OfS in the scrutiny process. In the current process, providers undergo a significant amount of duplication of information between QAA and what is provided to other bodies involved in regulation. This integration will reduce the resource burden of the DAPs process.

We also welcome the opportunity to extend the probationary period for a further 12 months to support those providers which may require further testing. This will provide greater protection for students and the opportunity for providers to meet requirements and progress with their DAPs application.

Question 5: Do you agree with the proposals for the OfS and providers to best ensure that students are aware of what type of DAPs, including New DAPs, a provider has? If you think there should be additional information requirements, please give details.

Slightly agree

The proposals for providers to make clear that they are a New DAPs provider are similar to the existing practice with annual re-designation for student finance. We are concerned that the OfS will not be able to sufficiently monitor New DAPs providers to ensure they are clear to students in all advertising, associated marketing and on their website that they have new DAPs on a probationary basis. The OfS must take steps to ensure that this information is clear to prospective and current students.

We also feel that student protection plans should include that any conditions introduced during or following initial assessment to protect students in the case that a provider fails scrutiny or monitoring (as mention in question 4). These plans should be made clear to students before they enrol, to ensure they are happy with that process before signing a contract with the provider.

Question 6: Do you agree or disagree with the suggested change regarding the possible variation of the level 6 TDAPs criterion?

Slightly agree

We strongly support a change to the proposed level 6 TDAPs criterion and encourage the OfS to avoid an approach which relies on numerical difference between qualification levels. An approach which focuses solely on level 6 provision or above would be detrimental to those providers with significant experience in level 6 provision but who are teaching a flexible model which allows students to progress by year or level. It would also disadvantage providers who teach high volumes of professional courses which might sit at different levels of the FHEQ. Application of a numerical requirement at level 6 or above would have a negative impact on student choice.

We would also encourage the Office for Students to provide opportunities for Level-Specific TDAPs where a provider has significant experience in delivering level 5 provision and no provision at level 6. These providers should be eligible to apply for Diploma of Higher Education Awarding Powers at level 5, which could be achieved using the powers vested in the Office for Students by the Higher Education and Research Act to specify the level of taught awards that a registered provider is empowered to grant. This would greatly expand the amount of level 5 provision available to students and raise the standards of vocational qualifications up to level 5.

Question 7 (with reference to question 6): If the 50 per cent criterion is to be disapplied in some exceptional cases, what factors do you think the OfS should take into account when determining whether an application is an exceptional case?

We do not feel that the 50% criterion should be disapplied only in 'exceptional' cases. In all cases, the provider should be evaluated on their ability to award at level 6, not the number of students studying at that level.

Many independent providers cater to a group of students which are largely underrepresented in the majority of providers with Degree Awarding Powers. 39% of students at 'Alternative Providers' enter HE over the age of 30, compared to just 6% in publicly funded universities. These students want flexible courses which enable them to return to work as quickly as possible and as a result, many independent providers offer qualifications at each of the three levels which make up a full level 6 degree course. This does not mean they are any less experienced at level 6.

The OfS should not label a provider as 'exceptional' if they do not teach the majority of their provision at level 6. We don't find this label helpful to encouraging providers towards TDAPs and thus expanding student choice, particularly for hard to reach groups of students.

The OfS should evaluate a provider's experience at level 6 through the scrutiny process, taking into account delivery models and student characteristics. In particular, the OfS should consider the following factors:

- If a provider offers flexible provision, how many students are on courses which through articulation pathways could build to a level 6 qualification (1+1+1 or 2+1 models for example)? Where a provider has the capability to design and deliver courses which support a student through to level 6 qualifications, but at their own pace, they should be eligible for TDAPs regardless of how many students choose to complete the full pathway to level 6.
- Student choice plays a significant role in student numbers in small providers with flexible provision. The OfS should consider if the delivery model of provision is less likely to encourage progression to level 6. For example students studying online, part-time or by credit are more likely to choose to exit their course or not articulate to the next level than those studying full-time on campus provision. In this case a few students could shift the balance away from a majority of students at level 6.
- Many specialist providers offer professional courses alongside degree provision. The OfS should not create criteria which force providers who offer professional study to reduce the number of students on these courses to create a greater balance of level 6 provision or above to achieve DAPs. This would be particularly damaging to providers who are industry focused or who teach in discipline areas with skill shortages where professional courses are a necessity and encouraged by other government policies. For example, providers who teach in the technology and IT sectors or who focus on CPD for school teachers.
- If a provider offers extensive level 4 and 5 provision and is applying for New DAPs at level 6, they should be able to gradually build up to significant level 6 provision through the New DAPs process and not be required to have a majority level 6 provision at the expense of their extensive level 4 and 5 provision.
- If a provider is intending to apply for Level-specific TDAPs at level 5 (Diploma of Higher Education Awarding Powers), they should not be required to have a majority of students at level 6.

Question 8: Do the application processes for DAPs sufficiently align with the registration processes and conditions?

Yes

Providers strongly support the ability to apply to the OfS and for TDAPs at the same time, and to use their risk profile on the register as part of their DAPs application. They anticipate this coordination will reduce burden and to some extent cost in the DAPs process.

In particular providers welcome the opportunity to combine the FSMG checks for the register with the enhanced FSMG tests for DAPs.

Some members did express concern that the quality assessment for the registration process might not recognise the unique approach undertaken by a subject-specialist provider. The OfS must ensure that changes made to facilitate subject-specific DAPs which may include the ability to recognise a wider variety of internal academic frameworks and communities, are reflected in the baseline quality assessment for entry onto the register. If based on a Quality Code which emphasises outcomes and welcomes diversity of process, this should be possible to achieve.

PART 2: University Title

Question 9: Do you agree or disagree that for providers that have obtained DAPs on an exceptional basis without having the majority of higher education students at level 6 or above (as proposed in question 6), the 55 per cent criterion for University Title should be adjusted to additionally require the majority of higher education students to be on courses at level 6 or above?

Strongly disagree

We feel strongly that where DAPs has applied an exception for student numbers there should be no further restrictions on numbers for University Title. For a UK student, there is no difference between a body which awards its own degrees and a university. There is no alternative title for this type of provider, as the UK system uses the term 'college' to refer primarily either to a further education college or to a college of a university. University Title should be closely linked to the grant of degree awarding powers and the conditions set for them.

Question 10: Do you agree or disagree that student numbers, for the purposes of the 55 per cent criterion for University Title, should be calculated based on the intensity of study, disregarding the mode of study? Please give reasons for your views.

Slightly agree

Restrictions which would inhibit providers offering innovative modes of study should not be introduced into the DAPS or UT processes. However, where a provider has a large number of students studying high intensity short courses, but considerable experience in level 6 provision, the student numbers based on mode should not restrict access to University Title.

Question 11 (with reference to question 10): Do you have any views on how students on accelerated courses should be taken into account, when calculating the percentage of

higher education students at a provider? Should these students be counted as 1 FTE, or more?

The FTE model from the Education Reform Act 1988 is considerably out of sync with modern delivery models and should be reviewed as part of the transition to the OfS. Key to this would be exploring how accelerated courses, new blended models of delivery, global delivery models and employment-based learning should be reflected in FTE.

Question 12: Do you agree with this assessment of the factors that should be set out in Secretary of State guidance to which the OfS must have regard to when determining applications for University Title? If you disagree, please give reasons. If you believe any additional factors should be included, please indicate what these are with reasons.

Slightly disagree

We remain concerned that the proposal to limit University Title to providers with a three year track record of full DAPs will prove prohibitive to providers who are not deemed to be VAT exempt. As we still have no clarity on who will be eligible to apply for an exception for VAT from those on the register, there is significant concern that the approach to University Title will mean a potential VAT bill of millions of pounds for some providers, as they leave the VAT protection of their university partner and must wait for a title of their own.

If the current provisions for VAT exemption remain, and a provider is only eligible to apply for exemption based on their relationship with their validating body or on their status as a University in their own right, any process which requires them to spend a considerable amount of time with neither the relationship or title will represent a prohibitive cost. The DAPs process is already costly, but the potential VAT bill from HMRC could far outstrip that cost and prove the most significant barrier for existing providers who want to ensure that their student fees do not have to increase to meet this cost.

While we agree with the proposals to include sustained scholarship, cohesive academic communities and learning infrastructure in the assessment for DAPs, we feel strongly that this element needs to be considered carefully in its application to subject-specific DAPs and the related University Title. Sustained scholarship or learning infrastructure in a multi-subject institution will look very different in an institution teaching only one or two related subjects. This must be reflected in specific guidance for subject DAPs.

We strongly support the recommendation that the academic requirements for DAPs be sufficiently robust to ensure that providers are able to take on board interdisciplinary angles as required without having to reintroduce a requirement for University Title based on the number of subjects. Much student driven innovation in curriculum design centres around the desire for students to learn about an industry rather than a subject and this model facilitates careers in the 21st century which are more likely to involve many roles across an industry than a single career based on a single subject. We would not want to limit this model by unnecessary restrictions on the number of subjects taught to be eligible for University Title. We would welcome further engagement with the OfS on how to incorporate the interdisciplinary factor into subject-specific DAPs and University Title.

Finally we welcome the recognition that the criteria for dissemination of knowledge, the public facing role of universities and wider support for students and pastoral care can be interpreted far too narrowly and thus could represent a barrier to University Title. We agree that the subjective nature of these factors would make them difficult to measure and leave judgements open to a lack of consistency or respect of

different models of delivery. The consultation does acknowledge that they would be at least in part covered by the DAPs criteria and we would welcome a specific reflection of how they would be measured in subject-specific DAPs as we feel this represents the same challenge of subjectivity and consistency of application as it would in University Title.

PART 3: Post-award issues

Question 13: Do you agree or disagree with this proposal of implementing the statutory provisions that allow for the revocation of DAPs and University Title and the variation of DAPs?

Slightly agree

We expect these processes to be very robust as they are likely to be challenged. It is right where regulatory failures are identified which relate to degree awarding powers, the OfS should have the ability to mitigate the risk for students by removing the powers. However, we expect the OfS to plan accordingly for the consequences of removing powers and to ensure that student protection plans include this provision and providers comply with their plans.

We expect revocation of DAPs to be a rare occurrence, as the OfS regulatory process should identify when a provider poses a higher risk, and if this is related to their DAPs they should apply appropriate conditions to be met before moving onto revocations.

Question 14: Do you consider the above proposals regarding a change in circumstances to be sufficiently robust to safeguard the meaning and value of DAPs and University Title?

Yes

Where a provider has a change in circumstances which could materially impact how it exercises its DAPs, in particular where this change would impact its governance, the provider should be reviewed to ensure that this change continues to meet the high expectations set by the DAPs process.

ANNEX A: The detailed DAPs criteria

Question 15: Do you have any comments on the proposed DAPs criteria as set out in Annex A? Are there specific aspects of the criteria that you feel should be adjusted in light of the OfS's overall regulatory approach, in particular ongoing registration conditions?

We are concerned that some of the DAPs criteria are not subject focused, and not only will be too narrow for innovative subject delivery, but will stand in contrast to the OfS's overall regulatory approach. For example, under criterion C there is a requirement for staff to have "active engagement with research and/or advanced scholarship" which we think is counter-productive for subjects where the delivery is practice-based and the outcomes are focused on practice-led teaching. Elsewhere in this same criterion there is reference to professional practice but this seems forgotten in this part of criterion C. The outcome for a student undertaking a PGCE should be successful practice as a teacher, which can be delivered by someone with considerable and active engagement with practice in teaching, not necessarily someone with active engagement with research.

We would welcome the opportunity to work with the OfS to develop a greater understanding of how the DAPs criteria can facilitate student outcomes for different subjects and different delivery models. There are many paths to supporting students to a degree award and beyond. Diversity in delivery models supports the diverse range of students we have wanting to access degrees. It is right for the OfS to focus on access to and outcomes from degrees, but we need to ensure that the DAPs process does not then limit the providers thriving in the OfS regulation who wish to move to degree delivery through narrow perspectives of what makes an academic community and a environment for supporting students for example.

We do strongly support the use of data and information already collected by the OfS to be used in the evidence process for scrutiny and monitoring of those on the register with ongoing DAPs applications This is a vital step to reducing the existing duplication of processes between the DAPs process and regulation.

Question 16: Do you have any comments on the proposals for the assessment of applications for subject-specific and Bachelor's only DAPs? Are there specific aspects of the criteria that you feel would either be particularly relevant or not relevant for either of these types of DAPs?

Subject-specific DAPs

We would expect the following changes to the scrutiny process to be implemented for subject-specific DAPs:

- A more streamlined academic governance structure should be acceptable as this is likely to reflect the smaller staff size and focus of provision. Externality will be evident and may even be prioritised over differentiation of function between committees in subject-specific academic governance. This should result in a significantly shorter scrutiny process, as there will be less layers of governance to engage with.
- The development and CPD of staff will reflect the subject and its relevant industry. Where the subject is primarily vocational or practice-based we would expect that the evidence required would reflect this, and in particular active engagement in the practice or vocation could replace the emphasis on research and advanced scholarship. The review panel should be familiar and have experience of the subject under evaluation, and the judgements should reflect both the teaching model and the industry expectations of scholarship.

For example, many creative arts institutions place a high value on practice in their academic communities, as opposed to peer-reviewed scholarship. A review process which prioritises sustained peer-review scholarship over practice-based scholarship would be unsuitable for a subject-specific DAPs. In this case a change to Annex A, point 27, where the subject is practice based we would suggest a subject based approach to this criterion would read: "This includes a responsibility for ensuring that staff maintain a professional understanding of current developments of practice in their professions and, where applicable, keep in touch with research and scholarship in their subject and for ensuring that structured opportunities for them to do so are both readily available and widely taken up."

Another example of how subject might impact the criteria for a practice-based subject is in Annex A point 28 c. The vocabulary used here is written for non-practice-based subjects: "knowledge and understanding of current research and advanced scholarship in their discipline area and that such knowledge and understanding directly inform and enhance their teaching; and active engagement with research and/or

advanced scholarship to a level commensurate with the level and subject of the qualifications being offered.” This would be appropriate for some teachers in a creative programme who specifically facilitate the research-based learning, but of primary importance is a requirement for teachers who are professionally active in the subject, making and in some cases exhibiting creative outputs. It is important that the institution with a practice-based subject recruits and supports staff who value development of their professional lives as practitioners alongside development of their teaching and learning experience. While research and scholarship should inform teaching, so too should practice where this is the mode of teaching the subject and the main outcome for students.

Assessment of collective student engagement should not prioritise the student union model, but instead reflect the size of provider, and the dominant delivery model for that subject. For example, in providers where there is a single cohort of students, collective student engagement may be embedded in the timetable rather than as a separate and extra-curricular activity such as student union meetings.

Academic frameworks should be able to reflect a subject-specific approach to credit and qualifications. For example, in a practice-based approach to a subject like fine art, academic frameworks might be based on an assessment of continual practice, rather than individual credits or modules. True subject-specific DAPs would consider innovative delivery models and focus on transparency, comprehensive implementation and subject-relevant justification for the use of that specific academic framework.

Panels assembled by the Designated Quality Body for scrutiny of subject-specific DAPs need to have considerable experience of the subject-area they are evaluating, and with representatives of both the academic and industry stakeholders in the subject area.

Question 17: Do you have any comments on how a subject should be defined for the purpose of subject-specific DAPs?

Common Aggregation Hierarchy (CAH) could be used for subject-specific TDAPs, with appropriate consideration of at what level the criteria would be redefined by the subject. Subject definition should ensure that the focus can be on what makes the subject different from others, enough to warrant a different application of the criteria.

Subject definition must also allow for interdisciplinary degrees where the provider can show the relevant evidence for the interdisciplinary approach.