

Universities Wales represents the interests of universities in Wales and is a national council of Universities UK. Universities Wales membership encompasses the Vice chancellors of all the universities in Wales and the Director of the Open University in Wales. Our mission is to support a university education system which transforms lives through the work Welsh universities do with the people and places of Wales and the wider world.

We are writing in response to phase 2 of your consultation on quality and standards in England. While we have informed the wider UUK response, there are some specific issues that we feel we should present to you directly as the questions as presented in the consultation do not fully cover our concerns.

Due to the devolved nature of education, Wales has its own Quality Assessment Framework and all regulated institutions are required to undergo external quality assurance reviews from an organisation listed on the European Quality Register for Higher Education. Quality Enhancement Review (QER) has been developed by the Quality Assurance Agency (QAA) with the Higher Education Funding Council for Wales (HEFCW) to meet this requirement.

While we rely on a mixture of metrics and reviews we would like to emphasise the importance to the HE sector of the UK Quality Code and the accompanying advice and guidance. This underpins the work we do, is internationally recognised and will remain part of our framework going forward. Removing it as a reference point for the sector at large will potentially cause damage to the reputation of the 'UK brand' of higher education. The intention in Wales is for it to remain central to our thinking. While some deviation in arrangements will occur between the nations of the UK, we believe this particular cornerstone should not be removed.

As you will be aware, in Wales we are developing new quality arrangements in tandem with HEFCW and the QAA which we expect to include a greater focus on quality enhancement. Our concern is that enhancement is not present as a theme in the consultation when work is being done in this area across the UK and continues to be an important part of how the sector continually improves. Our ongoing collaborative work in this area was particularly useful over the last 18 months as institutions pivoted to online delivery, sharing best practice in a fast-moving environment.

There is a significant cross-border flow in both directions between England and Wales. Students should be able to easily understand the arrangements that will underpin their education. The same concern also applies to students who may be applying from overseas. There is no recognition of a 'Welsh' or 'English' sector, but rather students, their advisors and indeed providers recognise the value of a UK-based education. Significant deviation has the capacity to destabilise this reputation. This is a serious matter and should be a matter of respectful discussion between the funding bodies, which all have a stake in UK infrastructure.

Similarly, overseas quality bodies with whom institutions across the UK operate may struggle to understand differences between regimes. The current system is widely understood and respected. We would also note that unilateral action by the OfS ‘in-country’ could have ramifications for providers based in Wales. We would strongly encourage you to build in a consultative process with other regulators across the UK prior to any action being taken, particularly as in Wales we will continue with a robust review method for TNE.

Lastly, we would like to echo the call for a full and meaningful impact assessment to be undertaken on what implementation in the current form would mean for the devolved nations to ensure that any unintended consequences are explored.

We look forward to hearing how we can work with you and other stakeholders to best represent the different quality arrangements across the UK.

**Professor Elizabeth Treasure**  
**Chair, Universities Wales**