

Consultation on quality and standards in higher education: raising the bar

If you choose to provide personal information with this consultation response, you will need to consent to us processing your data in line with the privacy notice outlined above

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Personal information

What is your name?

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What is your organisation? (if relevant)

Universities Wales

Which of the following best describes you?

An employee of a charity or third sector organisation

Are you submitting

A collective response?

Are you happy for your response to be published on the OfS website?

Yes, I am happy for my responses to be published

Questions relating to all proposals

Question 5: Do you have any comments about any unintended consequences of these proposals, for example for particular types of provider or course or for any particular types of student?

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 particularly in response to Question 5 of the consultation, 'Do you have any comments about any unintended consequences of these proposals, for example for particular types of provider or course or for any particular types of student?'.

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 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.

Our framework allows us to rigorously maintain standards while at the same time build on our achievements by enhancing our learning and teaching. We rely upon a mixture of metrics and reviews and are working closely with the QAA on developing enhancement themes.

We would strongly support maintaining a UK-wide link to the UK Quality Code. Staff, students and graduates move fluidly across the UK and the standards of our education system are recognised across the world.

Maintaining a common understanding of higher education is vital, particularly as our nation-led frameworks deviate. Retaining links to the European Standards and Guidelines will also be helpful and continue to allow us to attract the brightest and the best whilst maintaining links with our European neighbours. Our common approach, with all nations making use of the UK Quality Code, the qualifications frameworks, subject benchmark statements and the recent work of the UKSCQA has stood us in good stead in projecting a positive picture of UK higher education.

We recognise that England has its own quality systems, but if the developments suggested proceed, there will likely be consequences, not only for Wales but the whole of the UK. Failure to maintain a UK-wide HE sector will have repercussions for international perceptions of UK quality, this is particularly important as higher education is currently one of our largest exports.

Failure to provide a positive and joined up picture of UK-wide higher education will have ramifications for us accessing markets across the world and for joint work with world-leading institutions.

We are also concerned that the current focus on 'low-quality' gives the impression that there are widespread issues in the sector, this is not an issue that we recognise in Wales (or indeed in England), and we are unclear on what basis the emphasis is on this issue. The international perception of UK-wide higher education is naturally focused on England where the bulk of higher education resides and so a focus on low quality (with the associated connotations) in England is likely to cause a UK-wide issue.

We would also like to express concern at the suggested approach to benchmarking. In Wales we are focused on all students having a positive experience as our continued performance in the National Student Survey (NSS), particularly in learning opportunities and academic support will attest. We agree that no student should have a poorer experience because of systemic issues relating to their socio-economic background.

Benchmarking makes it less likely an institution will be disadvantaged through the regulatory system for recruiting those with lower prior attainment who are from disadvantaged backgrounds.

Without benchmarking allowing for this there is a danger that the system will favour the socially advantaged. The potential impact on students from lower socio-economic backgrounds is that they may be less likely to access higher education as institutions become more risk-averse in their recruitment and the potential unleashed by widening participation is stifled.

Finally, there are significant border-flows with Welsh and English students, retaining close links in terms of quality will ensure that this can continue without causing confusion for applicants in terms of what they can expect from higher education regardless of where they study in the UK.