

Consultation on the review of the UK Quality Code for Higher Education (the Quality Code)

1. *Does this proposal provide a coherent framework for quality and standards in UK higher education?*

We do not agree that the consultation provides a coherent framework for quality and standards. It is impossible for this code to be coherent until the process of how it will be used and implemented is devised. This is highlighted in the OfS consultation which specifically states that the designated quality body will be tasked with developing a new code if this one is not deemed suitable.

Whilst not directly a part of this process, there is a fundamental lack of student engagement within this code. The lack of continual improvement from the regulator makes it highly unlikely that the quality review process will have any student representative body involvement which has historically helped achieve significant enhancement and positive relationships between universities and representative bodies.

2. *Do the revised Expectations appropriately express the outcomes student and stakeholders should expect from higher education providers?*

No. The expectations are too narrow and simultaneously vague. The current code explicitly covers a broad range of areas used to manage quality and standards including: programme design, development and approval; student development and achievement; ongoing programme management and provision for research degrees. It is highly likely that key elements of this will be missed or downgraded as they are no longer key expectations. The expectations and the core practices require a significant amount of clarification which could be achieved through the development of the key guidance.

3. *Are the core practices for standards appropriate and flexible enough to:*

a. *Serve the needs of all nations in the UK?*

No, there is no acknowledgment of the devolved nature of higher education in the United Kingdom.

b. *Serve the needs of an increasingly diverse sector?*

No response

4. *Are the core practices for quality appropriate and flexible enough to:*

a. *Serve the needs of all nations in the UK?*

No, there is no acknowledgment of the devolved nature of higher education in the United Kingdom.

b. *Serve the needs of an increasingly diverse sector?*

No. The core practice 'Views and feedback from students are regularly sought and acted on and providers offer feedback in return' is concerning and does not reflect years of work in this area to recognise students as partners in their education. The potential for student feedback and engagement is to be downgraded to a survey response or show of hands in the classroom. The core practice should be refocused towards engaging students, with the core measure being based on the outcomes of embedded and positive engagement rather than the process of engagement. We believe that the core practice should be amended too: '**Students are engaged individually and collectively, through formal representation structures, in the development, assurance and enhancement of their educational experience**'.

It would be positive for the core practice, covering appeals and complaints, to explicitly include the expectation that students are able to access independent advice and support. It would recognise the unique relationship that a university (as the provider and arbiter of a complaint and appeal, as well as having the common place regulation that students are unable to challenge academic judgement on assessed works) and students (as consumer) have. This places all the power in the hands of the provider at the disadvantage of students. Acknowledgement of independent advice and support will also safeguard students at new providers who will not necessarily have access to a Students' Union.

5. *Does the proposal to develop supplementary practices:*

- a. *Serve the needs of all nations in the UK?*

No, there is no acknowledgment of the devolved nature of higher education in the United Kingdom.

- b. *Serve the needs of an increasingly diverse sector?*

As discussed above, downgrading student engagement is highly concerning. Currently, processes such as programme development, validation and revalidation all feature students heavily by gathering feedback in focus groups, student meetings and direct representation on the review panel. They are able to ensure that student voice is considered and addressed throughout the process. This enables course level representation to generally focus on enhancement rather than structural problems. Partnership between staff, students and students' union's is well established and should be developed rather than downgraded to a 'nice to have extra'. The downgrading of the core practice to: *'views and feedback from students are regularly sought and acted on and providers offer feedback in return'* runs the risk that positive enhancement activities are lost.

6. *How should we involve the UK nations, the higher education sector, students and other stakeholders (such as graduate employers) in the future development and management of the quality code?*

Firstly, establish a quality review process that each key stakeholder can access with a clear and defined role in development. Secondly, ensure that student engagement is a core practice and expectation across the sector, and finally ensure that students in England have the same opportunity to feed into quality and academic processes.