

Our response to the Department for Education's consultation on the de-designation of QAA as the Designated Quality Body in England

Universities UK (UUK) is the collective voice of 140 universities in England, Scotland, Wales, and Northern Ireland. Its mission is to create the conditions for UK universities to be the best in the world, maximising their positive impact locally, nationally, and globally. Universities UK acts on behalf of universities represented by their heads of institution.

This document outlines UUK's response to the [Department for Education \(DfE\) consultation](#) on the de-designation of the Quality Assurance Agency for Higher Education as the Designated Quality Body in England.

Background

The Quality Assurance Agency for Higher Education (QAA) is the designated quality body (DQB) under the Higher Education and Research Act 2017 (HERA). On 20 July 2022, the QAA announced that it will no longer consent to be the DQB after the current DQB year ends on 31 March 2023.

Under paragraph 5(4) of Schedule 4 to HERA, the Secretary of State is required to consult before removing the designation of a DQB, even where the DQB has requested, and consents to, the removal of the designation.

If the QAA's designation is removed as requested, the Office for Students (OfS) has confirmed that, from 1 April 2023, it will undertake all quality and standards assessment activity on an interim basis pending further consideration of future arrangements.

Question: Do you agree that the designation of the Quality Assurance Agency for Higher Education as the designated quality body for higher education in England should be removed, on the basis set out above?

We agree that following the decision of the QAA to no longer consent to be the DQB in England, it is appropriate for the designation to be removed. We accept that this means the function for quality and standards assessments will revert in full to the Office for Students from 1 April 2023 on an interim basis.

We are aware that this decision risks exacerbating a perception of difference across the UK higher education. In Scotland, Wales and Northern Ireland, the QAA continues to work closely with the funders and regulators to assess quality in line with their statutory responsibilities, using the Quality Code for Higher Education published by the QAA and UK Standing Committee for Quality Assessment (UKSCQA) as a basis for this assessment. The Code already has no equivalent regulatory status in England but with the decision to remove designation from the QAA, it creates a further point of divergence.

The OfS must continue to work constructively with its counterparts in the devolved administrations, including through the UKSCQA, to safeguard against undermining the strength and reputation of UK-wide higher education. UUK would be pleased to convene and support discussions with our members from the other nations.

It is our strong view that the vast majority of higher education in England, as in the rest of the UK, is high quality. Universities undertake rigorous internal processes to assure themselves they are maintaining academic standards in line with sector-wide frameworks, designing courses that draw on the latest disciplinary and pedagogical thinking, and are constantly seeking opportunities to enhance student experience. This is complemented by external quality assurance arrangements, including the cyclical Teaching Excellence Framework (TEF) and the OfS conditions of registration. Students, the public, and international audiences can be confident that irrespective of the designation arrangements, that the degrees universities award here are high quality and high value.

While this consultation is not about future arrangements for quality and standards assessment in England, our agreement with the de-designation proposal hinges on

the wording, 'on the basis set out above'. The consultation states that from 1 April 2023, the OfS 'will undertake all quality and standards assessments on an interim basis'.

We believe that a DQB, that works with but is independent of the OfS, remains the most appropriate model. It ensures the legitimacy of an investigating authority to conduct its activity and inform impartial and evidence-based judgements. It also supports the continual development of investigative expertise and skills, with greater space for academic input, and provides greater clarity of roles between assessors and OfS staff, ensuring freedom to express evidence-based opinions.

We are therefore calling on both the OfS and DfE to commit to and publish a clear timetable for when and how a review of the interim arrangements will take place. Whatever the outcome, interim arrangements should not be made permanent by default without an assessment of performance. Such an assessment must involve consideration of value for money, effectiveness, and the potential for future efficiencies. It should also be informed by sector feedback, and we are calling on the OfS to confirm plans for how it will consult with the wider sector on the establishment of longer-term arrangements.

We also want to emphasise that our agreement to the proposed de-designation is given on the condition that during both interim period and future arrangements, the OfS is held accountable on its ability to:

- Protect student choice and enable universities to tailor teaching, learning and assessment to best meet the needs of students and communities.
- Protect the credibility of higher education qualifications in the UK and internationally and ensure the UK maintains its world leading status as a trusted destination and partner in the delivery of higher education.
- Ensure the public funds and students fees directed into providers' OfS and/or DQB registration fees are spent in an efficient and cost effective way that demonstrates value for money and minimises burden.
- Ensure providers' quality and standards are assessed by competent experts using evidence collected in an impartial and independent way, with a rigorous and transparent methodology.
- Protect student interests by ensuring investigations identify and help to address pockets of low quality provision, while supporting students to access and understand the implications for their learning.

- Provide leadership and expert independent advice, to create opportunities for innovation within the regulatory framework and support better regulation.

Finally, in progressing with the de-designation, the OfS and DfE will need to reflect on the position of the QAA. In their decision to demit DQB status, the QAA reflected on concerns that the regulatory approach to quality and standards in England is only now ‘partially aligned’ with the European Standards and Guidelines (ESG) according to the European Quality Assurance Register for Higher Education (EQAR). As above, we are confident that higher education in England is high quality and that external quality assurance arrangements play an important role in upholding this. The DfE and the OfS should commit to monitoring the impact of ‘partial alignment’ with the ESG and make securing ‘full alignment’ of the system in England a priority, if the de-designation goes ahead as proposed. This should be accompanied by work to communicate and explain the system, particularly to international audiences. Universities UK international (UUKi) is pleased to work with the OfS to ensure that overseas regulators and partners are reassured of the robust nature of the systems in place in England and across the UK.