

Office for Students strategy consultation response

Question 1: Do you have any comments to make on the OfS's proposed strategy for 2025 to 2030 or the priorities set out within it?

QAA broadly welcomes the proposals set out in the OfS's strategy consultation document. The proposals on quality will, if implemented, create greater alignment between the approach taken in England and those taken in the devolved nations. UK coherence is an important factor in maintaining the sector's international reputation, so this is welcome. The proposals for a more holistic approach, greater transparency and more meaningful student engagement in the regulator's quality arrangements are all positive steps.

Alignment with the European Standards and Guidelines

We were encouraged to see the strategy proposals include greater alignment with the European Standards and Guidelines (ESG). QAA has been successfully reviewed against the ESG and consequently registered with the European Quality Assurance Register, so has relevant expertise that may be helpful. We strongly believe that ESG compliance will strengthen international trust and collaboration for the English sector and generate greater UK coherence (as Scotland, Wales and Northern Ireland remain committed to ESG compliance).

The integrated quality model

QAA welcomes the proposal to create an integrated quality model. Creating a more comprehensive approach to quality and regulation will enable the OfS's quality arrangements to be more cohesive, agile and proportionate. We particularly welcome the greater focus on incentivising continuous improvement, student engagement and greater transparency of the information used to determine regulatory action.

The benefits of a more integrated quality model are many, but areas in which English providers particularly seek to benefit include greater ease in learning from one another's practice, greater contextualisation of the whole institution and more consistent oversight of the complexities of higher education provision.

However, we do note that this represents a significant shift in the OfS's approach to quality. As such, we encourage the OfS to undertake the necessary preparatory work to ensure a smooth transition for the sector and to avoid unnecessary burden, including being clear with stakeholders domestically and internationally what the changes are and why they have occurred. We also recommend that OfS is careful to avoid duplication of QAA's quality enhancement work for the sector, delivered through our UK-wide membership programme, particularly given current resource constraints in the sector.

Recognising that the current operating environment has evolved since previous iterations of quality regulation, we also recommend the OfS learns from alternative and legacy methods to avoid duplication and inefficient use of resources. As such, we have drawn on our extensive experience across the UK and internationally to outline the crucial considerations involved in successfully developing a quality model. We hope it is helpful in the OfS's development of the proposed integrated quality model.

An effective quality model is proportionate, agile and based on strong foundational principles

We recommend that there is broad consultation on the new model, to ensure that sector concerns are addressed, and duplication with the many other regulatory bodies operating in the sector is avoided. Any significant shift in quality arrangements must be grounded in the issues of quality that impact upon students, such as availability of learning resources, feedback timeframes and usage policies for artificial intelligence. The consultation documentation suggests that any proposals are situated in these broader trends but are less clear on how the new model will integrate with the various existing components of quality regulation and the non-regulatory quality landscape. Doing so is necessary to ensure coherent oversight which is sustainable and not overly burdensome.

The sector in England is incredibly diverse. An integrated model must account for this diversity, locating common ground where possible and embedding agility where not, to accommodate the plethora of delivery models, including college-based higher education, independent and specialist provision and sub-contracted provision as well as traditional universities. Based on QAA's recent experience developing a quality model and review method for the whole tertiary sector in Scotland, QAA would recommend undertaking robust mapping exercises of the types of providers the model will apply to.

We also recommend being clear at the start about the principles that will inform the design of the integrated quality model. For example, for QAA, this includes but is not limited to an emphasis on national enhancement efforts, robust annual internal

processes within providers, student partnership, a focus on data and evidence, and a cyclical element to external assurance.

Co-creation is vital to delivering sector investment and active engagement in any quality model

We recommend that the OfS actively engages the sector in the creation and implementation of the new model. In QAA's experience, the best way to develop a robust and effective quality approach is to develop it *with* providers, rather than impose it upon them. A fundamental principle of QAA's approach is "no surprises" which mirrors one of the proposed "I statements" included in the strategy consultation - co-creation from inception and the level of trust this engenders is the first step towards that.

This level of engagement has benefits beyond ensuring investment in the new approach – it also enables the model to incorporate components based upon the sector's assessment of their needs and requirements. For example, the Tertiary Quality Enhancement Framework in Scotland includes sector capacity building to enable providers to engage fully with the new model. This was particularly pertinent for colleges for whom the new model represented a significant shift from previous iterations. This element will directly contribute to the effectiveness of reviews.

Data and evidence must form the basis of any intelligence gathering

Data and evidence play a crucial role in any quality model, and we welcome the continued focus on this aspect of intelligence gathering and the role it plays in regulatory action. We were encouraged to see recognition of the role of qualitative data in the consultation proposals.

In Scotland and Wales, where QAA operates a similarly integrated quality model, the responsibility for data and evidence provision to inform review activity lies with the relevant funder-regulator and the institution under review respectively. Timely and accurate data and evidence is essential to conducting an informed, robust quality review and therefore transparent and timely mechanisms to share it is crucial.

It is vital though to triangulate quantitative data with robust student engagement. Therefore, proposals reflecting plans for greater student engagement are welcome.

QAA reviews are also informed by a thorough self-evaluation conducted by the provider ahead of any review and by an initial review visit that establishes a clear focus and

scope of the review. Agility can be beneficial, and we will flex the evidence requested as part of the review to meet the scope.

Consistency is necessary for effective evaluation, which must be embedded from inception

Evaluation needs to be purposefully built into any quality framework, and we recommend that the OfS incorporate this aspect in the design and development of the integrated quality model.

QAA's experience developing the Tertiary Quality Enhancement Review (TQER) in Scotland demonstrated the value of embedding evaluation in the design of the model. In the case of TQER, this will be the last year of a seven-year cycle to maximise learning from across the sector (at this point, all providers will have been reviewed at least once). Designating the evaluation point at the beginning of a new approach also incentivises all parties involved to keep the arrangements consistent to enable effective evaluation.

An evaluation approach would be specific to the quality model, but QAA has found the following mechanisms useful:

1. Mapping improvements in the areas of recommendation included in the review reports, measured through the follow-up engagements included in the method;
2. Analysing patterns across reviews to determine if areas of concern have improved across the sector;
3. Gathering feedback from institutions of their experience of the review and how the broader measures have enabled them to enhance their quality;
4. Gathering feedback from the funder-regulator and any external bodies about the usefulness of the method to inform their engagement and activity on quality.

Peer review is central to any robust quality review method

For the new quality model to be effective, OfS must continue its efforts to build a deep and experienced reviewer pool, and its work internally to strengthen review oversight and build experience in peer review techniques and delivery.

A broad and varied reviewer pool enables review teams to be specifically selected and sized to best match the context of the provider, a particularly important factor in the context of England's diverse sector. QAA reviewers and the reviews themselves benefit from moderation of applications and comprehensive training, but a large reviewer pool

also enables a balance of experience in review teams to ensure that newer reviewers are adequately supported.

Reports primarily inform and support the institution under review, but form the basis of any sharing of best practice

ESG compliant review reports are primarily intended to inform an institution of areas of commendation, improvement and action from their review. QAA publishes individual review method guides that entail what needs to be included in a report and they are structured carefully to ensure consistency and transparency. In Scotland, ahead of finalising arrangements for TQER, QAA extensively workshopped the presentation of judgements to ensure they were as useful as possible for both institutions but also external stakeholders and the wider sector.

We also incorporate agility in review reporting. The lengths and content are not standardised because the review and findings themselves will necessarily be different, dependent on the outcomes.

QAA also conducts thematic reviews of our reports to share these learnings in a more accessible and digestible manner. Between these two outputs – institutional review reports and thematic reviews – QAA ensures that review outputs are beneficial both for the institution but also for the wider sector to support enhancement.

The Quality Risk Register

QAA welcomes the principles behind the proposal for a Quality Risk Register. In theory, it is a sensible mechanism to take a sector-wide view of systemic risks to quality and publishing this will imbue greater transparency in the intelligence the regulator is using to inform regulatory action. Giving providers sight of the register will enable providers to draw on sector-wide intelligence to focus their own resources on areas of identified risk. However, should OfS decide to make the register fully public, messaging and information must be clear to prevent external stakeholders, particularly internationally, misconstruing the risk register to indicate an erosion of quality rather than a transparent mechanism to strengthen trust in the system and boost sector-wide efforts to address areas of risk. The OfS should consult further with the sector to achieve a balance that is robust and effective.

