



UK Quality Code Review - feedback summary (April - May 2024)

Introduction

This document provides an overview of the UK Quality Code consultation responses and aims to explain the adjustments made to address the feedback received.

The formal consultation ran from 8 April to 17 May 2024. We received 77 responses: 36 on behalf of a higher education provider, 29 from individuals, 7 from sector bodies, 4 from further education colleges and 1 uncategorised. 69% of responses were from those based in England, 14% from Scotland, 4% from Wales, 4% from Northern Ireland, and 5 responses were UK-wide. 60% of respondents had participated in earlier Quality Code redevelopment activities, either online workshops (47%) or online survey (13%), meaning 40% were engaging directly or responding for the first time.

Feedback received via the consultation builds on the extensive engagement throughout the development process where approximately 789 participants from across the UK sector took part in activities to shape and build the UK Quality Code. This engagement took different forms and included scoping discussions and a workshop to discuss the structure. As we developed content, we held a series of discussion events and surveys enabling colleagues from across the sector to feed back at each stage of development to ensure the final document was truly sector-led.

General questions and emerging themes

- 84% of respondents agreed the Sector-Agreed Principles and Key Practices offered a useful framework for developing, supporting and enhancing internal quality practices and satisfying external requirements.
- Alignment of the Quality Code to the European Standards and Guidelines was widely welcomed.
- Respondents provided positive feedback on QAA's approach to engaging the sector throughout the process of redevelopment, emphasising that QAA had actively listened at the various stages.
- 88% considered the Quality Code to be applicable across tertiary education (see below for further exploration).
- Views were divided over whether to rename the Quality Code as 'The UK Quality Code for Tertiary Education' although the number concerned about renaming it was greater than those agreeing to change the title (see page 2 for further exploration).
- 95% supported the format of the Sector-Agreed Principles, although some feedback suggested they would benefit from further editing.
- Environmental sustainability was raised by several respondents.
- Some comments around evidencing and demonstrating the Key Practices suggested that providers were not completely clear about how the Quality Code would be used in QAA review methods. Implementation of the Quality Code will be addressed by those leading each of the review methods.

Illustrative quotes

'The 12 Sector-Agreed Principles are entirely appropriate, and the underpinning Key Practices provide helpful, more detailed guidance/recommendations for providers and make it clear how a provider can demonstrate alignment to the Principle. The explicit links between assurance and enhancement are articulated well.'

'We believe that the proposed 2024 edition of the Quality Code is user-friendly and much clearer than the existing Code. At 12 pages, it is concise yet comprehensive and preferable to the current Code's sheet of A4. We like how it is organised in a practical way around three key themes.'

'ESD [Education for Sustainable Development], similarly to EDI [Equality, diversity and inclusion], should be integrated and referenced throughout the Quality Code, forming an essential and explicit part of tertiary education providers' academic standards and quality.'

Applying and naming the Quality Code in relation to tertiary education

We had two questions in the consultation explicitly addressing the use of 'tertiary'. This was the area that attracted the biggest split in views.

We asked: '**Do you consider that the Quality Code can be applied across tertiary education?**' 88% of respondents answered positively, although there were many accompanying comments.

Positive comments included:

- the Quality Code would be applicable
- the same overarching principles apply wherever and whatever level of provision is offered
- the ethos of the Quality Code should be treated as transferable and transitional
- the Quality Code offers an open and accessible framework that works in a variety of settings, complementing pre-HE frameworks.

Negative responses included:

- concern around diluting the usefulness to HE providers
- terminology still seemed HE-focused but to amend the Quality Code further to include FE and/or technical provision might be problematic
- providers in schools in Wales and further education sectors will continue to look to ESTYN guidance and resources in the first instance as they retain the inspecting duty.

Many respondents highlighted that there is no settled definition for 'tertiary' across the UK and outside the UK it is even less well understood. This means it is unclear to many readers what types or levels of provision would be included or considered as 'tertiary.' It was suggested that it would be more appropriate to fully introduce an updated Quality Code once tertiary review methodologies are implemented.

We also asked: '**In recognition of the fact that the Quality Code will be used in a wide range of settings beyond higher education, what is your view of renaming it as "The UK Quality Code for Tertiary Education"?**'

Overall, while there was some support for renaming, the responses opposed to this change were more strongly expressed.

Negative views included:

- disliking the term 'tertiary'
- the Quality Code needing more amendment before adopting a new name
- the risk of less engagement from the HE sector as the Quality Code may be perceived as less relevant to HE providers
- it was too early for the change
- the suggested change in title could create a barrier to the Quality Code's use overseas as the term 'tertiary' is not well understood outside (or inside) the UK.

A small number of responses suggested using the term 'post-16 education' instead of 'tertiary' was something we could consider as we refresh the Advice and Guidance.

Overall, we believe there is enough support for the view that the Quality Code is helpful across tertiary education to proceed on that basis with the version of the Quality Code that was sent out for consultation. Regarding renaming the Quality Code, there is much stronger support for retaining the current formal title, 'The UK Quality Code for Higher Education', than for changing this to explicitly include 'tertiary.' We anticipate it being possible to revisit the title and references in the text of the Quality Code when we complete the redevelopment of the accompanying Advice and Guidance - in approximately three years. We anticipate that by 2028, the term 'tertiary' and our understanding of it is likely to be better embedded.

Environmental sustainability

As previously indicated, several responses called for explicit reference to environmental sustainability throughout the Quality Code. We have addressed these requests by adding more text to the introductory section of the Quality Code and including explicit reference in several of the Sector-Agreed Principles and Key Practices.

Sector-Agreed Principles and Key Practices

On the whole, there was strong support for the Sector-Agreed Principles, and slightly more requests for adjustments to the text of some Key Practices. The exception was Principle 11 (relating to teaching, learning and assessment) where there were more requests for adjustment to the wording of the Principle itself. This was unsurprising as Principle 11 was the most recent addition to the document. The majority of comments were supportive of the intent of the current text but proposed further refinement.

The text below gives an overview of the consultation responses in relation to each Principle.

Principle 1 - Taking a strategic approach to managing quality and standards

- 92% stated that the Principle makes it clear what is expected of a provider, with requests for refinement being about clarity and explanation around the meaning of a 'strategic approach' in this context.
- 77% agreed that the Practices made it clear how a provider could demonstrate alignment to the Principle, with suggestions for a greater focus on environmental sustainability.

Principle 2 - Engaging students as partners

- 94% said that the Principle was clear, but there were some comments about complex sentences. Feedback indicated that the term 'governance framework' (in the original wording) might not be well understood.
- 79% agreed that the Practices were clear, but some indicated that they were repetitive and not concise enough.

Principle 3 - Resourcing delivery of a high-quality learning experience

- 90% stated that the Principle was clear. Feedback asked for explanation of terms such as 'high-quality' and 'innovative'.
- 77% agreed that the Practices were clear. Some requested more detail - in several cases, the level of detail requested will be provided in the supporting Advice and Guidance.

Principle 4 - Using data to inform and evaluate quality

- 96% said that the Principle was clear, although there were isolated comments about the difficulties of collecting departmental-level data and the hierarchy of data requested (or suggested) by the text.
- 77% agreed that the Practices were clear, with comments requesting more emphasis on environmental sustainability, ethics of data usage and secure storage. Feedback also indicated a desire to state that quantitative as well as qualitative data were covered, but QAA considered this as sufficiently captured by Principle 4's existing use of these terms.

Principle 5 - Monitoring, evaluating and enhancing provision

- 96% stated that the Principle was clear, that it would be helpful for shaping monitoring and evaluation processes, and the focus on inclusion was welcomed. There were some requests for greater clarity of language.
- 78% agreed that the Practices were clear. Comments were consistent with those throughout, about the inclusion of the environmental sustainability principles alongside equality, diversity and inclusion (EDI) practices, and to reduce some complexity and duplication in language.

Principle 6 - Engaging in external review and accreditation

- 92% said that the Principle was clear, encompassing all external review approaches while not restricting providers in England. Some refinements to the drafting were suggested.
- 87% agreed that the Practices were clear, but QAA was asked to acknowledge that not all providers were required to engage in external review, and to remove passive language.

Principle 7 - Designing, developing, approving and modifying programmes

- 91% agreed that the Principle was clear. The alignment to the ESG was welcomed, given the differences in regulatory/quality frameworks across the UK.
- 77% stated that the Practices were clear but asked for some further detailed editing to reduce repetition between the Practices and the Principle. QAA was also asked to talk about student involvement in the course design/review approval process.

Principle 8 - Operating partnerships with other organisations

- 91% stated that the Principle was clear, with some minor amendments suggested to the wording.
- 77% agreed that the Practices were clear. QAA was asked to replace 'periodic review' with 'regular review' to support those who have moved to continuous improvement (or dynamic) approaches.

Principle 9 - Recruiting, selecting and admitting students

- 97% stated that the Principle was clear, and respondents welcomed the approach with students being at the heart of the process.
- 88% agreed that the Practices were clear, but QAA was asked to make more explicit reference to legal obligations around the information provided to prospective students.

Principle 10 - Supporting students to achieve their potential

- 95% said that the Principle was clear, although a small number of responses indicated that it was too broad.
- 77% agreed that the Practices were clear, however QAA was asked to be more specific around the term 'stakeholders'.

Principle 11 - Teaching, learning and assessment

- 87% stated the Principle was clear, with some drafting improvements given
- 70% agreed that the Practices were clear, with suggestions to separate academic integrity into its own Practice, explicitly mention authentic assessment, and give greater emphasis to the role of research in learning and teaching.

Principle 12 - Operating concerns, complaints, and appeals processes

- 97% stated that the Principle was clear, with comments that appropriate learning and information about complaints/appeals should be shared and reviewed at governance level in providers.
- 96% agreed that the Practices were clear, with suggestions to ensure applicability across all nations.

Glossary

- 90% of respondents thought that the Glossary was helpful in aiding understand of key terms. QAA was asked to include 'concerns, complaints and appeals,' and clarify what is meant by a 'strategic approach to quality' and to be more explicit about the term 'tertiary' across the UK.

We would like to take the opportunity to thank all colleagues across the sector for their invaluable contributions in shaping the [UK Quality Code 2024](#).

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