

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

About UA

University Alliance (UA) unites the UK's leading professional and technical universities: the places where the knowledge and skills that will power the UK's future are built. We are always looking for new and exciting ways to teach and research, and working hand in glove with business, industry and public services to keep the UK at the cutting edge. Alliance universities promote the best of British higher education worldwide, with campuses and partnerships across the globe, while remaining rooted in their local communities. The Alliance is committed to driving regional prosperity and social mobility, and our universities have the power to deliver growth across the UK.

Below we outline our response to the single question in 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.

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?

On 20th July 2022, the Quality Assurance Agency for Higher Education (QAA) took the unusual decision to step down from its role as the Designated Quality Body (DQB) for higher education in England, a position created by the Higher Education and Research Act 2017 (HERA). The key reason cited for the move was to avoid deregistration from the European Quality Assurance Register for Higher Education (EQAR). The OfS's approach to quality assurance, which QAA is obliged to follow as the DQB, is apparently no longer compliant with the EQAR's criteria.

This is a deeply disappointing development, as the QAA was uniquely well placed to act as the DQB in England, and it will continue to fulfil a similar role in the other nations of the UK. Over the past two decades the QAA has built a sophisticated, world-renowned quality assurance (QA) infrastructure in partnership with the higher education sector that has global influence and reach. Countries such as Malaysia, the UAE, and Sri Lanka have modelled their own QA systems on the QAA model. For reasons we expand upon below, it is our strong preference that the QAA continues to perform the DQB role in England.

However, if the QAA is permitted to step down on 31 March 2023, the OfS will undertake all quality and standards assessments on an interim basis. We reluctantly concur that this is reasonable in the circumstances, as there is no other organisation with the prerequisite expertise that could fulfil the DQB role right now. However, if this happens, **UA is calling on**

the DfE and the OfS to work with the sector to find a long-term solution that is in line with the original intentions of HERA.

We strongly believe that the sector needs an independent DQB that is separate from the OfS to maintain high quality and standards and protect its international reputation. During the passage of HERA, the House of Lords stressed the need for an independent body to assess quality and standards. One of the key reasons cited was to enable judgements to be made about quality without fear of undue influence from individual providers or political interference. This resulted in the introduction of the DQB function via a government amendment at Report stage in the Lords. The CEO of the OfS has [outlined](#) the mechanisms through which ministers can lawfully exert influence over the OfS; in her view it was designed to be reasonably responsive to the government of the day. As higher education quality increasingly becomes the subject of political scrutiny, the need for an independent DQB is stronger than ever.

Moreover, the Government has an ambitious programme of higher education reform which includes increasing take-up of higher technical qualifications and degree apprenticeships and incentivising more flexible and modular provision through the Lifelong Loan Entitlement (LLE). Developing new systems of quality assurance that are fit for purpose for this new and emerging provision will require significant experience and expertise which an independent DQB is ideally placed to provide. Conversely, the lack of an independent DQB could hinder progress.

We remain extremely concerned about the divergence of the regulatory approach to quality and standards in England from the rest of the UK, as well as European and international norms. This puts our global reputation at risk. According to the EQAR, England is now only ‘partially aligned’ with the European Standards and Guidelines (ESG). The UK is currently the second largest exporter of education with campuses and partnerships all over the world. This expansion has been greatly aided by the development of the QAA’s UK Quality Code, which is globally recognised and respected. Our world leading higher education sector is a great British success story, attracting approximately £17.6 billion in export value and priceless soft power benefits to the UK every year. As key competitors such as Australia and Canada raise their global ambitions, we cannot afford to be complacent. Breaking up the quality assurance regime in the UK and diverging from international standards puts our competitive advantage at risk.

We strongly support UUK’s call for an independent review of the interim arrangements. It is vital that they are not made permanent by default, and that there is a robust assessment of their impact that takes in the views of a wide range of stakeholders, including higher education providers. This should include monitoring the impact of ‘partial alignment’ with the ESG. We would like to see the OfS and DfE commit to publishing a clear timetable for when and how a review of the interim arrangements will take place as

soon as possible. Following the review, there must be a full public consultation on the longer-term arrangements for quality assurance in England.