Review of Coherent Provision and Sustainability in Further and Higher Education – Response to the Call for Evidence from the Quality Assurance Agency for Higher Education

This contribution is submitted by the Quality Assurance Agency for Higher Education in response to the call for evidence as part of the Scottish Funding Council's Review of Coherent Provision and Sustainability. We welcome the opportunity to provide input at this stage of the process and look forward to working with the SFC and other stakeholders as this review progresses.

a) **What do you think works well in the current further and higher education arrangements that we should keep in order to secure Scotland's inclusive social and economic recovery from the current pandemic? How can we best preserve and strengthen those features of education, research and innovation in Scotland that we most prize, in a very challenging funding environment?**

Since 2003, the higher education sector in Scotland has had an enhancement-led approach to quality based on a strong partnership model between providers, students, funders and QAA. The Quality Enhancement Framework (QEF) was regarded as radical at the time of its introduction and over the years has received much admiration and emulation around the world. For example, Enhancement Themes have been introduced in both South Africa and New Zealand. It enables the sector to benefit from a coherent approach which ensures review and enhancement activity work together and symbolises a shared commitment to the success of Scotland's HE system.

The five elements of the QEF cover internal and external review, sector-wide enhancement activity, student engagement and the concept of public information for transparency. The QEF was designed with and for the Scottish sector recognising that this would deliver the greatest value in improving the student learning experience. However, it also includes the ability to make a strong statement about threshold academic standards and quality. Importantly the QEF has always been outwardly focussed, enabling the sector to learn from practice internationally and to create innovative solutions to suit the Scottish context.

The Scottish sector is regarded as a leader in responding to the student voice and in encouraging the productive use of qualitative and quantitative data by staff and students. For example, QAA Scotland was asked to host a workshop for European colleagues on student-centred learning, our Responding to the Student Voice cards have been widely adopted across the UK and overseas, and our Guide to Students Using Evidence has been cited on the Office for Students website. The QEF is also responsive to change and, while we believe retaining the core principles of the approach is important, it can be adapted to ensure both the approach to quality – and the sector itself – are responsive to current contexts.

The QEF has contributed to Scotland's excellent standing in the UK and globally when it comes to the quality of its higher education. This can be demonstrated by the

high rates of student satisfaction seen in Scotland (often outpacing other UK nations[1]). The QEF has the flexibility to meet the needs of very different institutions in the sector. For example it has been used to positive effect for tertiary institutions or those with college provision, specifically Scotland's Rural College (SRUC) and the University of the Highlands and Islands (which includes colleges within its partnership model). The QEF has proven to be flexible and resilient, providing institutions with constructive challenge during and following periods of change, such as mergers and strategic realignments.

During and following the pandemic, the enhancement-led approach ensures the sector can continue to develop a collaborative 'whole Scotland' approach to meeting the challenges of the disruption and the uncertainty which is likely to be a feature of the future. Elements of the QEF can be tailored to focus on specific areas of provision, or areas of education that have seen significant change, to ensure that tertiary education in Scotland can develop swiftly to suit the needs of the nation, while also maintaining high quality and standards.

Periodic external review of higher education institutions in Scotland through Enhancement-led Institution Review (ELIR) has been successful for institutions and students. It also meets European standards[2]. Institutions monitor and evaluate the quality of their learning and teaching practices using key external reference points including checking adherence to the UK Quality Code for Higher Education, which in itself drives improvements.

Every ELIR results in a clear judgement about threshold quality and the academic standards of the awards offered. That clear statement sits alongside a differentiated set of recommendations for improvement, development or further reflection, and a suite of commendations which recognise good practice that can be shared more widely. The ELIR process has been used to constructively challenge institutions as they seek to enhance their practices and the quality of the student learning experience they offer. The fact that it is conducted on a regular basis and includes systematic follow up linked both to individual institution and sector enhancement activity, ensures that areas of improvement can be acted upon.

Institution-led review (ILR), another core element of the QEF, requires institutions to review each of the disciplines they offer on a maximum of a six-year cycle. Institutions have flexibility to design and manage the precise processes they use, provided these meet the expectations of the Quality Code and the guidance published by the Scottish Funding Council (SFC) on quality for higher education institutions. The processes used for ILR and the outcomes of those reviews are considered carefully as part of the periodic ELIR visit where they are scrutinised by a team of peers. They are also discussed annually with QAA Scotland officers. This approach is used more widely, for example with SRUC and UHI.

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[1] https://www.universities-scotland.ac.uk/scottish-universities-top-uk-satisfaction-survey/
[2] This approach to external review ensures that Scotland is compliant with the Standards and guidelines for quality assurance in the European Higher Education Area (ESG), which state that "Institutions should undergo external quality assurance in line with the ESG on a cyclical basis"

The QEF facilitates and encourages collaboration between higher education institutions, while also drawing on international practice. For example the Enhancement Themes[3], managed by the Quality Assurance Agency (QAA), provide a sector-wide systematic process for the sector to focus on particular areas of future challenge and develop imaginative ways of addressing those, some of which involve sharing existing good practice (inside and outside Scotland) and some involve developing new ways of tackling issues. Recent examples of practice include developing approaches to using learning analytics, creating a suite of resources relating to the skills and strategies students need to make effective learning transitions, and producing a massive open online course (MOOC) aimed at supporting graduates into employment.

Our Focus On projects identify commonly occurring topics from ELIR[4] and design a programme of activity aimed at improving policy and practice. Topics addressed in this way include feedback from assessment, the postgraduate student experience and, most recently, technology enhanced learning[5]. These projects have received extremely positive feedback from inside and outside the Scottish sector, for example the Resource Hub developed as part of the Focus On: Technology Enhanced Learning project has been highly acclaimed across the UK.

Student engagement has been an area of considerable strength in the Scottish higher education sector for some time – the establishment of sparqs along with the launch of the QEF was far-sighted. We have a very successful track record of working with students in every aspect of our activity. For example, students have been full members of ELIR teams from the outset and the sector group which leads the Enhancement Themes has equal staff and student membership. Recent substantial successes include the development of the Student Guide to Using Data which enables students not only to be data subjects but to use data in their academic and representative roles, and our work on Responding to the Student Voice principles and associated practical tools. This demonstrates our capacity to continue seeking improvements even in areas of considerable strength.

All of this work helps to ensure that Scotland's higher education institutions are world-class, best placed to contribute to an inclusive social and economic recovery, and that Scotland continues to be an excellent place for students to study. Universities will be able to support Scotland as it recovers from the pandemic, providing high quality education to the people of Scotland. QAA also stands ready to support the sector as it continues to adapt to new teaching methods, and new ways of operating across the tertiary education sector. While we would of course welcome greater efforts to work on a regional basis, allowing for collaboration across different types of tertiary education providers, the opportunities for nationwide and international collaboration should continue.

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[3] https://www.enhancementthemes.ac.uk/
[4] https://www.qaa.ac.uk/scotland/reviewing-higher-education-in-scotland/enhancement-led-institutional-review/thematic-reports
[55] https://www.qaa.ac.uk/scotland/focus-on

b) What do you think colleges, universities and specialist institutions should stop doing, or do differently, in order to contribute effectively to an inclusive social and economic recovery? (You may wish to comment on teaching and skills development, sectoral and employer needs and employability, research, innovation and knowledge exchange, widening access and equalities issues.)

While our education sectors can point to very many successes, there can be tensions between them which may militate against step change improvements for all learners. For example, there has been a positive increase in the opportunities for, and numbers of, students articulating from college into university study. In a previous Enhancement Theme, QAA worked with the sector to improve Student Transitions but the structure of our funding meant that we could only engage colleagues in the college and school sectors at the margins or for very specific pieces of work.

We would welcome the opportunity to support the move to develop a truly tertiary sector in Scotland which would enable all learners to be clear about the opportunities they have, and to ensure there can be smooth, productive transitions whether those are 'vertical' transitions between education providers or 'horizontal' moves between education and employment. In our June 2020 Enhancement Conference we included speakers with experience of creating 'permeable' boundaries between universities and their wider communities as a prelude to engaging more in their work and as a prompt for the sector. This is an area we are very keen to explore further with SFC and our other partner bodies.

In terms of supporting economic recovery, our 2018-19 Focus On: Graduate Skills project identified a range of resources for institutions including findings from two commissioned studies of employer, recent graduate and current student views of the skills developed while at university[6]. The 2019-20 Focus On: Technology Enhanced Learning project provided immediate support for the rapid pivot to online digital delivery and curated a wide range of resources which will be key to the changes the sector will make to its learning and teaching practices, such as engaging students who are studying at a distance and supporting students to make positive transitions.[7]

Supporting employability is not new to the sector, such as through Enhancement Themes including the important work on identifying and embedding graduate attributes, but the needs of the economy and wider society will mean the sector taking a refreshed look at this area. Reports, including from the Enterprise and Skills Strategic Board, indicate that there will be a need for upskilling and reskilling and we are keen to support this renewed focus amongst the Scottish institutions. There is also likely to be a need for creating jobs, for example through renewed focus on enterprise and entrepreneurship including helping students to develop these attributes while studying[8]. QAA Scotland looks forward to engaging more in these areas to benefit the sector, our economy and wider society. In doing so, we will build on the links we have established through our work, some of which are identified

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[6] https://www.qaa.ac.uk/scotland/focus-on/graduate-skills
[7] https://www.qaa.ac.uk/scotland/focus-on/technology-enhanced-learning
[8] https://www.qaa.ac.uk/scotland/development-projects/enterprise-and-entrepreneurship

here, and our UK-wide work engaging employers and professional bodies (PSRBs) through the subject benchmark statements[9] and our specific PSRB Forum.

c) How can colleges, universities and specialist institutions best support Scotland's international connectedness and competitiveness in the post-pandemic, post-EU membership environment?

Scotland has the fortunate starting position of an excellent global reputation in terms of the quality of its higher education provision. Universities in Scotland are continuing their partnerships with institutions across the globe through their transnational education (TNE) provision, and new arrangements are continuing to be announced. QAA has supported higher education institutions with their TNE arrangements to ensure they are of the highest quality, and it has published a series of country reports outlining the higher education landscape of many countries and territories, as well as the ongoing partnerships that exist between those places and the UK. This work demonstrates QAA's global reach, and this international expertise is used in turn to support its work within the UK and Scotland.

QAA also supports and encourages international engagement via its membership scheme[10] (which all Scottish higher education institutions are automatically included in). QAA members benefit from Country Reports on the landscape and regulatory environment in key countries for UK higher education; institutional case studies on a range of TNE provision in key countries; regional studies and guidance on emerging markets in TNE as well as the expertise gained through QAA's international partnerships with other quality assurance agencies. QAA has also worked with the Quality Beyond Boundaries Group developing cross-border cooperation, sharing intelligence and seeking cross-border recognition of qualifications, allowing for broader opportunities for home students who wish to work and study abroad, or for those wishing to come to Scotland to work or study here.

Efforts will need to be made to ensure that institutions still have the support to develop or extend their international links in the future, including staff mobility for learning and teaching as well as research. The current funding model for universities places a lot of reliance on incoming international students, and long-term strategies should be prepared in the event of changes in international student numbers. We are aware this is being explored by SFC with the Scottish Government.

Scotland's Enhancement Themes have a strong international focus which both enables the sector to learn from international practice, as well as raise the profile of Scottish HE internationally. This has included engaging colleagues from other countries in joint enhancement projects and participating in events hosted by QAA such as its regular International Enhancement Conference. Our Conferences have included many contributions from international experts (the most recent online International Enhancement Conference included 454 registered delegates from twenty countries). Conducting scans of international practice is a key part of our work to ensure the sector is informed and can engage with particular good practice. For example, recently QAA undertook research into how institutions across the world

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[9] https://www.qaa.ac.uk/quality-code/subject-benchmark-statements
[10] https://www.qaa.ac.uk/en/membership/membership-in-scotland

have responded to the pandemic. We were able to share the resulting database with QAA members across the UK[11].

Following Brexit, Scotland's active engagement in the European Higher Education Area and Bologna Process becomes even more important. QAA has a key role supporting Scotland's work, aligning closely with the Scottish Government. QAA Scotland are founding members of the European Quality Audit Network (QAN) a grouping of quality agencies who conduct institutional review. Our membership of QAN ensures we are at the forefront of good review practice and are able to influence thinking amongst member agencies. Our influence to date can be seen in the number of countries who are introducing enhancement-orientated elements to their review and wider quality activity.

A very specific change post-Brexit is the incoming introduction of undergraduate tuition fees for students coming to study in Scotland from the EU. Efforts may need to be made to ensure that Scotland remains competitive when appealing to potential EU applicants. The cultural and educational benefit that is brought to higher education through Scotland's international students is worth investing in.

Further investment could also be made in supporting international student mobility, particularly in encouraging Scottish domiciled students to take an opportunity to study abroad. Previously, Scotland had the 'Scotland goes global' web portal, which acted as a hub of information and guidance to encourage international student mobility from Scotland. Evidence has shown that international mobility experiences can enhance a graduate's overall skillset and prospects of securing graduate-level employment. Students who have the opportunity to study abroad are also more likely to be socially mobile, and there is a clear widening access dimension to the need for support in this area, as recognised by the number of universities who offer short study abroad opportunities for widening access students. However, as identified in the 2018-19 European Higher Education Area mobility scoreboard[12], Scotland has fallen behind as it no longer has a central web portal providing key information and guidance on outward learning mobility.

   d) **What opportunities and threats does the post-pandemic environment hold for colleges, universities and specialist institutions? For institutional leaders, how are you planning to address these challenges and opportunities?**

There are obvious concerns around the financial impact on tertiary education providers as a result of the pandemic, with fears over reduction in fee-paying student numbers. While application data so far indicates this may not be as bad as once thought[13], early data from the number of international student deposits paid is lower this year than at similar points in previous years.

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[11] https://www.qaa.ac.uk/en/news-events/support-and-guidance-covid-19/tne-international-policy-practice
[12] https://eacea.ec.europa.eu/national-policies/eurydice/content/mobility-scoreboard-higher-education-background-report—-201819_en
[13] https://www.bbc.co.uk/news/uk-scotland-53339518

Our experiences with the higher education sector demonstrate that institutions have been flexible and imaginative in their swift move to online delivery of learning, teaching and assessment in response to the pandemic. Institutions will need to continue to ensure their staff are appropriately trained and developed to conduct teaching and provide support to students in a digital environment. Tertiary education providers will also need to ensure students are involved in decision making when it comes to developing new learning and teaching practices, particularly at short notice. There were a number of examples of very good practice in relation to student engagement during the pandemic and our work with students suggests there can be greater opportunities for enhancing student engagement in quality activity when processes are run in the online environment.

It is likely there will need to be some adaptation to regular quality assurance and enhancement processes to ensure they are effective in the changed circumstances. Institutions should also act swiftly when student concerns over the quality of their learning and teaching are raised. QAA has been proactive in supporting the higher education sector in Scotland and across the UK, for example producing a substantial Resource Hub of materials to support good practice in getting provision online and engaging students in their learning while studying at a distance. We are also able to offer advice and detailed support to individual institutions when they wish to discuss any changes to their quality processes.

As part of our work in response to the pandemic, QAA produced a broad suite of guidance[14] to support tertiary education providers, which includes examples of practice from across the UK and internationally. It includes references to education providers in areas at different stages of reopening campuses, which can also provide an insight into how institutions here can respond and adapt in the future. A substantial part of the QAA guidance focuses on preserving quality and standards through a time of rapid change, which emphasises how quality can still be assured in current (and future) uncertain circumstances. All of the guidance can be used by a wider range of tertiary education providers – our work in other parts of the UK includes universities, colleges and alternative providers.

Academic integrity continues to be vitally important in order to secure public confidence in the awards offered as online digital delivery increases. Essay mills have been targeting learners to offer their services, and the tertiary sector must work to ensure these services are not one step ahead of them. As the UK's independent body safeguarding quality and standards in higher education, QAA has worked with sector agencies, government departments, regulators, politicians and academics with expertise in academic misconduct to protect academic integrity and prevent cheating and fraud. QAA has produced guidance on how to address essay mills and contract cheating, as well as on assessing with integrity in digital delivery[15].

   e) **What forms of collaboration within the tertiary education eco-system would best enable a coherent and effective response to these challenges and opportunities?**

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[14] https://www.qaa.ac.uk/news-events/support-and-guidance-covid-19
[15] https://www.qaa.ac.uk/about-us/what-we-do/academic-integrity

We believe the Quality Enhancement Framework has proven its value as a vehicle for promoting collaboration and partnership working across the higher education sector, ensuring high quality delivery and an excellent student experience. The review and enhancement activities act as catalysts for institutions to reflect meaningfully on their work, and draw the institutions together enabling them to achieve more by working collectively than they could individually. Our work on the Student Transitions Theme demonstrates our awareness of other sectors and our readiness to support effective learner journeys. In other parts of the UK, QAA has oversight of the quality assurance of higher education provision within further education colleges, demonstrating our ability to collaborate across the tertiary sector.

In the current Enhancement Theme (known as Evidence for Enhancement), collaborative clusters have proven to be an especially effective way of facilitating collaboration between groups of institutions and engaging wider groups of staff and students. Between 2017-20, QAA Scotland supported eight collaborative clusters: Learning Analytics; Supporting programme leaders; Employability in the creative disciplines; Graduate careers support; Creating a sense of belonging in online distance learning; Measuring beyond metrics (identifying the hard to quantify but valued aspects of HE); widening access through lecture capture; and student mental health and wellbeing. These have proven to be very effective for Scottish higher education, producing tools and approaches which have been adopted across the higher and further education sectors.

As part of the Student Transitions Theme, QAA developed an online, interactive Student Transitions Map which demonstrated the different learner journeys in tertiary education and acted as a search engine for accessing resources and examples of good practice which the sector can learn from[16]. We would welcome further opportunities to share information and to collaborate across the tertiary sectors, to ensure high quality and smooth student transitions.

Good progress has also been made in recent years in developing new and flexible pathways through tertiary education, and efforts to continue to grow this would be welcome. Initiatives such as the Advanced Higher Hub, College Connect and College Pathways at Glasgow Caledonian University have provided support and new routes to learners who wish to enter higher education. As more pathways through tertiary education open up, efforts will need to be made to ensure that learners, and those supporting them (parents, teachers and other sources of support) are fully aware of what is available to learners in Scotland. Learners are less likely to be aware of the various opportunities available if those supporting and guiding them can only refer to more traditional ways of learning from the past.

f) **How can SFC, alongside government and other enterprise, skills and education-focused agencies, best support colleges, universities and specialist institutions to make their full contribution to Scotland's inclusive, green and education-led recovery? In particular, you may wish to draw out:**
   - **How scarce public resources should be prioritised to drive recovery**

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[16] https://www.studenttransitionmap.uk/#!/home

- **Particular areas of collaboration between agencies that would best support the sectors' contributions**
- **Adaptations to SFC's funding and accountability frameworks to promote agile and collaborative action by the sectors to build Scotland's recovery**
- **How SFC's funding and accountability frameworks should ensure that equality and wide access to educational opportunity are promoted as key elements of the recovery for younger people and adults**
- **What support SFC and government could give institutions to adapt to a changed environment**

In order to ensure effective collaboration between the various different tertiary education sector stakeholders, facilitation of regular discussion would be welcome. In recent months, the Scottish Government's Further and Higher Education Covid-19 Ministerial Leadership Group created in response to the pandemic has brought most key stakeholders together, facilitating fruitful discussions and sharing of information. Continuing an approach of this sort in the longer term may allow for more collaboration between the different elements of tertiary education in Scotland.

In order to meet the needs of the economy, it is likely there will be a greater focus on part-time study and on the relationship between work and study. This might include institutions offering and recognising different types of short-course, credit bearing qualifications, or verification of micro credentials. QAA is considering these across the range of its work and has offered to share information and discuss this further with SFC.

A potential vehicle for enabling employers to gain the benefits of quick upskilling while also offering individuals the opportunity to build towards a larger qualification, is through the recognition of prior learning (RPL). QAA worked with the higher education sector and the Scottish Government to produce the RPL toolkit[17]. It would be timely to revisit this to consider how it can be adapted to suit the current economic needs of Scotland following the pandemic. We anticipate a need to support and encourage greater adaptability amongst education providers. Accordingly we have launched the 2020-23 Enhancement Theme, Resilient Learning Communities, which will have a focus both on diverse learners and increasingly flexible forms of delivery.

Recent years have seen an increase in different learning opportunities and pathways through tertiary education, with efforts to increase articulation from college to university and with the creation of new graduate level apprenticeships. This should continue to grow and be supported, including raising awareness of the opportunities to learn through these new flexible pathways. With newer modes of learning, there can of course be associated risks, which is why securing academic standards and enhancing the quality of these programmes will be essential. A targeted and responsive approach to quality across the tertiary sector will enable institutions to innovate and take managed risks to benefit learners, the economy and wider society.

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[17] https://www.qaa.ac.uk/scotland/development-projects/recognition-of-prior-learning