

Universities Wales represents the interests of universities in Wales and is a national council of Universities UK. Universities Wales membership encompasses the Vice chancellors of all the universities in Wales and the Director of the Open University in Wales. Our mission is to support a university education system which transforms lives through the work Welsh universities do with the people and places of Wales and the wider world.

We are writing in response to your consultation W21-32HE 'Consultation on revision of external quality assurance review requirements'.

Welsh universities have consistently demonstrated a commitment to quality assurance and enhancement, and championed the value of operating in line with a UK quality approach while recognising the distinct context of Wales.

Broadly, we welcome an increased focus on enhancement and the timely consideration of how we can strengthen this aspect of quality.

We also remain of the view that student involved quality processes is valuable and we are pleased to see this continue to feature in HEFCW's approach.

Below we set out some brief comments on where the proposal could be strengthened.

Consultation Questions

1 Do you agree with the proposed changes to the institutional review requirements for Wales? Please explain your response.

We are broadly in agreement with the proposed changes, and supportive of an approach that allows for an increased focus on quality enhancement. However, there are areas where the current proposal could be strengthened in this regard and there are some areas that we feel could benefit from clarification or amendment.

2 Are there any other changes which you think would be beneficial to maximise the usefulness of reviews to institutions, and/or to provide assurance to HEFCW and/or governing bodies?

With regards to the timing of reviews altering (point 7), and there potentially being shorter times between reviews, we feel it would be useful to have an indication of what triggers may be used that would cause this.

Whilst there is no issue in principle with the further sharing of intelligence (point 8), we feel that this process should be fully transparent, with an indication of what data sources will be used for what purposes and how this could be contextualised.

The section on enhancement (points 10 – 14) raises a number of issues. We feel strongly that the proposed method is focused on assurance rather than enhancement.

If the aim is to have an enhancement-led model, it may be worth considering the balance between enhancement and assurance, and where the emphasis is placed. This would

build upon recent work that has been done by the sector in HEIRF¹ and Race Access and Equality. This would effectively resemble a baseline QA system with a greater emphasis on QE which would allow more flexibility. It may also be worth exploring the option of having an enhancement judgement as part of the method.

We would also note that the OfS is due to launch a consultation on TEF which, because of its relationship to baseline requirements, is being seen as an enhancement mechanism. It may be helpful for HEFCW to maintain line of sight on these proposals when developing the EQAR as it remains possible that TEF will have implications for Wales and Welsh providers, if only by virtue that some institutions may choose to participate as they have done previously.

In tandem with this, whilst we accept that the proposed information to be used to inform enhancement is indicative, we feel that it would be useful to define a wider range of data at this stage of the process and to be transparent on how the data may be used (and indeed would note that it is possible we may be able to curate one set of data for both purposes). This would help ensure, where possible and reasonable, that the use of data sources where possible is aligned with other parts of the UK which would be in the interest of a UK-wide quality approach.

With regards to the proposed joint work on enhancement with Scotland and Northern Ireland, we are broadly supportive, but conscious that Scotland are in the process of revising their arrangements and so there may be challenges with alignment, although as noted above, more flexibility in our enhancement method may make this an easier process.

Point 16 of the consultation raises some issues around what form the self-evaluation document should take. Whilst the principle of a more 'live' document is of interest, we are wary that the approach could become too prescriptive, hindering institutions from accurately reflecting their diverse missions and context, and become akin to something closer to an ESTYN inspection method. Although valuable documents in their own right, we are not convinced that annual quality reports submitted to governing bodies would be a useful vehicle for this exercise. We agree that we will have to work carefully with the QAA in order to provide a set of documentation that would be of use to all concerned.

3 Are there any unintended consequences of the proposed changes to the external quality assurance review requirements?

We would note that these proposals are subject to potential change in light of the CTER bill and the subsequent creation of a Tertiary Education Council.

4 Do you have any comments on the proposed amendments to the Quality Assessment Framework? Are there any other areas of the Framework which you think need to be amended?

Please see question 2.

5 What effect (if any), positive or adverse, will these proposals have on: • opportunities for persons to use the Welsh language; and • treating the Welsh language no less favourably than the English language.

¹ [Review of Digital Learning \(Wales\) \(qaa.ac.uk\)](https://www.qaa.ac.uk/review-of-digital-learning-wales)

No further comment.

6 How could the policy be changed so that the policy decision would have positive effects, or increased positive effects, on: • opportunities for persons to use the Welsh language; and • treating the Welsh language no less favourably than the English language.

No further comment.