

Consultation on quality and standards conditions

If you choose to provide personal information with this consultation response, you will need to consent to us processing your data in line with the privacy notice outlined above

I consent to the OfS processing any personal data I submit in line with the privacy notice outlined above

Personal information

What is your name?

Johnny Rich

What is your email address?

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What is your organisation? (if relevant)

Engineering Professors' Council

Which of the following best describes you?

Other (please specify):
A representative HE body

Are you submitting

A collective response?

Are you happy for your response to be published on the OfS website?

Yes, I am happy for my responses to be published

Questions relating to all proposals

Question 11: Do you have any comments about the proposed implementation of the proposals in this consultation?

Question 14: Do you have any other comments about the proposals?

The OfS' response to the phase one quality and standards consultation, and subsequent thinking on this consultation, has not taken proper assessment of criticism from a "large proportion of respondents", including the EPC. While the EPC does not fundamentally disagree with attempts to measure quality per se, in general, we hold that the non-binary baseline definitions and non-exhaustive examples of possible interpretations remain debatable and subject to the OfS's view. Neither the descriptors nor the arguments would stand up to academic scrutiny.

It is impossible to square OfS's initial quality objective – a more clear definition of quality for the purpose of setting minimum baseline requirements for all providers to include the outcomes delivered for students, and enable consideration of quality for different modes and levels of provision and for different groups of students – with this consultation.

In drowning the phase two consultation in detail about the definition of the qualitative aspects of quality, the OfS has deflected from any admissions "indicators that are monitored and might provide an indication of a quality concern" and baseline numerical outcomes measures. Without an understanding of the scope or the objective of the exercise (in terms of the measures of success) – the subjective statements made have no context, are not testable and are not equitably enforceable. Using the academic analogy above, we have not been given the essay question or the success criteria and so it is impossible to give constructive feedback beyond saying that the issues on which OfS wishes to consult cannot be considered without more of the critical context and detail.

In recognising that quality assurance is part of the OfS's regulatory role, it is important to acknowledge that the UK's HE system is already regarded highly around the world. There is much to be gained from considering, preserving and enhancing the features of that system that give rise to this world-leading status. To that end, we suggest that OfS should be careful to value the existing and well-understood external mechanisms in place in providers to secure standards (including necessary subject nuance), such as the use of external examiners, peer reviewers and Professional, Statutory and Regulatory Bodies (PSRBs) and the widespread use of the UK Quality Code, Subject Benchmark Statements and the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). That "a provider is free to choose to follow the guidance in the Quality Code where that guidance does not, in the OfS's view, conflict with the requirements of the proposed conditions" exemplifies our above point.

By withholding the top, tail and context, the OfS has not provided enough information for the EPC to understand the testing of quality in practice. On its own, the level of detail on this consultation is too narrow and insular to provide useful grounds for constructive comment.

The EPC therefore feels unable to provide applicable feedback at this time, but remains keen to do so once the full picture is made clear. We look forward to the future consultation on student outcomes to which we intend to make an informed response.

Meanwhile, the EPC's responses to the three previous consultation questions relating to proposal 1 and four questions that related to all of the proposals (in addition to specific questions on the other proposals) remain as pertinent with reference to the current consultation as they were when we submitted them.