



Russell Group response to consultation on simplifying access to the market

1. Summary

We welcome the intention to introduce greater competition, innovation, and student choice. However, appropriate safeguards must be put in place to protect students. This means maintaining a robust baseline of quality. Greater clarity is required about the criteria which providers must meet before being granted New Degree Awarding Powers (NDAPs) as well as expectations of progress over the course of the probationary period. Without a clear threshold for access to NDAPs, it is difficult to see how decisions can be made consistently and confidence in the process maintained.

A high degree of scrutiny is required for providers with NDAPs through the monitoring process, and early intervention by OfS should be enabled before a provider fails. Relying on reporting from the provider may not be sufficient; we would suggest observation visits should be mandatory and conducted on a regular basis. The role of the designated quality body (DQ4((o2 841.93(ow)17()JTETQq0.000008871 0 595.32 841.92 reW*n

- 2.2 UK higher education currently enjoys a strong reputation globally, and there may be wider knock-on consequences if assurance processes are not robust, including for students. Thresholds for access to degree awarding powers (DAPs) need to guard against these risks, particularly where providers do not have a prior track record.

Threshold for access to New DAPs (NDAPs)

- 2.3 We welcome the requirement for providers applying for NDAPs to demonstrate public confidence, both present and future in their systems for setting and maintaining academic standards and quality. However, there is a lack of clarity about the criteria which providers must meet before being granted NDAPs. **Without a clear threshold for access to NDAPs, the regulator will have a significant degree of discretion in making decisions with the potential for this to undermine consistency and confidence in the decision-making process.**
- 2.4 The consultation document sets out detailed criteria (in Annex A) which providers must meet over the course of the probationary period after they have been granted NDAPs, but expectations from day one need to be much clearer. The regulator should set out how expectations will

unlikely to understand the distinction between New (i.e. probationary) DAPs as opposed to full or indefinite DAPs and the differential associated risks. These must be clearly spelled out in plain language emphasising the higher risk of NDAPs providers exiting the market, and the knock-on consequences for students.

Research Degree Awarding Powers (RDAPs)

- 2.10 **Processes for awarding RDAPs must ensure that the UK's reputation for research excellence is protected.** We welcome the commitment in the Higher Education and Research Act 2017 that the advice given by the DQB to the OfS in respect of any matter relating to research awards must be informed by the views of UKRI. As above, greater clarity is required regarding the way in which advice from the DQB feeds into OfS decision-making. A clear commitment should be made that maintain a high-quality learning and research environment for research students, then RDAPs should be withheld.
- 2.11 We note the proposal to re-examine the option of awarding RDAPs on a probationary basis. **There are significant risks associated with opening up the market to award research degrees.** In particular, student protection plans are unlikely to be adequate to protect research students if their provider does not attain full RDAPs. Given the level of specialisation involved in undertaking a doctorate, it is unlikely that a student would be able to finish their degree at another institution without very significant detrimental impacts on their research, if they are able to find another suitable institution at all.
- 2.12 In addition, a three-year probationary period would be too short given that many doctoral students will take longer to complete, particularly those studyi(en)3(t)-4tudn 0 595.32 8413(en)12ai90(i)5