

Russell Group response to the OfS consultation on quality and standards

1. We welcome the opportunity to respond to this consultation and look forward to continuing our engagement with the OfS as the regulatory approach to quality and standards is developed further in 2021.
2. The extension to the submission deadline is helpful, but this is an extremely challenging time for the sector to give thorough consideration to the proposals outlined. Many of the issues posed in this consultation require consideration alongside a full assessment of the proposed baselines and the future development of the TEF. Therefore, whilst we have responded to some of the proposals, we consider that a fuller response will only be possible through a more holistic consideration of these issues within phase 2.
3. We recommend that the OfS treats responses to phase one of their consultation as broadly indicative of whether the sector supports their intended approach and does not make any firm conclusions or regulatory changes until phase 2 is complete and it has had the chance to consider the sector's response in the round.
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Student complaints

- 2.2 We are concerned about the proposals to use student complaints as a way of determining quality and standards, because as proposed we do not think this will allow proper consideration of the wider context and external circumstances that can impact student experience/dissatisfaction. We regard this proposal as a crude indicator which will not offer a fair and balanced insight into the quality and standards of a particular institution. It is also a factor which is highly subject to influence by external factors beyond the control of the institution, for example instances of complaints in the context of strike action or as illustrated by the last 12 months changed modes of delivery in light of the pandemic. The latter is of particular concern in that while our universities have done all they can to continue to provide a high-quality teaching and learning environment for all students, general anxiety about the pandemic, and its real and perceived impact on sections of society, is out of the university sector's control and yet is likely to have an impact on student experience.
- 2.3 The variation in the way in which institutions record incidents of complaints, especially in respect of informal complaints which the OfS intends to consider, is also likely to skew the assessment and impact its effectiveness as an objective measure of quality. For example, a higher proportion of complaints may be reflective of a more easily accessible and transparent complaints process. We support the OfS' existing approach where the number, nature and pattern of student complaints submitted to the OIA are considered within the wider B conditions of the regulatory framework.

Degree classifications

- 2.4 We do not agree with the OfS' intention to include data surrounding degree classifications within their metrics of quality indicators. A number of studies, including by the OfS,¹ has attempted to identify and distinguish explained from unexplained trends in degree classification outcomes. However, these studies have acknowledged that these trends are very difficult to measure and cannot capture the full range of contributing factors. **Given that these issues have not been resolved, we recommend the OfS exclude any assessment of this data from its quality indicators.** The data for those graduating in 2020 (and possibly 2021) will also be anomalous given the very specific circumstances students and universities have had to cope with during the pandemic.

Data sources for indicators

- 2.5 The OfS states an intention to use graduate employment rates, including progression to professional and managerial jobs and higher-level study, as an indicator of student outcomes. However, it is not clear which dataset would be used for this purpose. While the Graduate Outcomes Survey provides a rich dataset of information, the statistics released so far have been experimental and it is unclear how the data will develop over time. There are also limitations to this dataset, including that it is only a snapshot 18 months after graduation, which limits insight into the future trajectory of these

LEO earnings data relates to salaries three years after graduation. It is likely that any given course or institution will have changed significantly between when the student started their course and the data that becomes available and as such should be interpreted cautiously.

LEO does not capture international students or those who have entered postgraduate study.

While we support the use of LEO, it is vital that these challenges are considered and we ensure that this data is not the only measure of quality used to assess a provider's performance.

- 2.7 **We recommend that the OfS engages closely with the universities and Higher Education Statistical Agency to establish how best graduate outcomes can be captured and measured by the regulator.**

3. Enhanced monitoring

- 3.1 We cautiously welcome the OfS' intention to minimise their use of enhanced monitoring. While we support this

is maintained. The Quality Code also represents one of the remaining ties underpinning the UK regulatory and quality framework. It is vital that this is upheld if we are to maintain UK-wide comparability and we ensure we safeguard our international partnerships. Given this, we strongly urge the OfS to ensure that the Quality Code retains its current status within the regulatory framework.

- 6.2 It is vital that any approach adopted by the OfS ensures that the external assessment of UK higher education upholds standards which are internationally recognised, for example the European Standards and Guidelines (ESG)². The ESG states that as institutions formulate quality assurance policies these should be developed and implemented alongside the involvement of external stakeholders. **In order to safeguard the international competitiveness and credibility of our sector, it is important that the approach pursued by the OfS aligns with such standards and includes a recognition of the significant role which this externality serves, including peer review and external examiners.**
- 6.3 We also encourage the OfS to ensure effective join-up between their regulatory activities and those of the designated quality and data bodies, as well as the approaches adopted within the devolved nations to ensure we achieve a holistic approach to quality and standards which avoids any unnecessary duplication of effort. It is important to ensure that reductions in bureaucratic burden in one area are not simply replaced by new requirements elsewhere.
- 6.4 While the OfS has proposed to add the UKSCQA sector-recognised standards to their definition of 'standards', we support the continuation of these standards as a voluntary code