

## Consultation on changes to the Academic Infrastructure

The University and College Union (UCU) is the largest trade union and professional association for academics, lecturers, trainers, researchers and academic-related staff working in further and higher education throughout the UK. We welcome the opportunity of responding to the QAA's consultation on changes to the Academic Infrastructure.

### Consultation question 1

For the purpose of the UK Code of Practice for standards, quality and enhancement, the following definitions will apply:

- **Threshold academic standards** are the level of achievement that a student has to reach to gain an academic award. For similar awards, the threshold level of achievement should be the same across the UK.
- **Academic quality** is a way of describing how well the learning opportunities available to students are managed to help them to achieve their award. It is about making sure that appropriate and effective teaching, support, assessment and learning opportunities are provided for them.

*Are these the appropriate definitions?*

We note the definitions adopted by the QAA. In particular, we welcome the reference to 'learning opportunities' rather than 'learning experience', though our preference is for the word 'educational opportunities' as this better reflects the fact that a course of HE study involves both teaching and learning.

The consultation document lists a number of important elements that help to ensure that "appropriate and effective teaching, support, assessment and learning opportunities are provided" for students (for example, academic and personal support, staff development and the contribution students make to their own learning). However, the crucial role played by core funding is not listed in the consultation document. In the coming years the greatest threat to the quality of teaching and learning will be the lack of public investment. Consequently, we would like to see a reference to the role of public funding in the items listed in the penultimate paragraph on page 5.

## Consultation question 2

*Do you agree that the components of the Academic Infrastructure should be restructured into the UK Code of Practice for standards, quality and enhancement? Will the new Code of Practice make clear the distinction between standards and quality?*

### *Principles*

In order to prevent oscillation of disciplines, pedagogies and methods of assessment, we welcome the commitment to periodically reviewing the quality and standards infrastructure. As a trade union and professional association we have a particular interest in the final bullet point on page 7 ('staff are supported, enabling them in turn to support students' learning experience'). We believe that there needs to be greater emphasis on support for 'academic and learning support staff' within the overall quality assurance system and would like to propose some additional principles. These include:

- The importance of keeping responsibility for quality and standards close to staff, departments and institutions.
- Increasing the participation of those who actually deliver teaching and learning support in debates about quality assurance - both at the national and institutional levels.
- The need for a greater focus on quality enhancement, and linking this more closely with staff development, training and support.
- A recognition that quality and standards can only be maintained and enhanced in a context whereby adequate resources are made available for teaching and learning.

We welcome the positive references to students in the set of principles and in particular the reference to students having "the opportunity to contribute to the shaping of their learning experience". However, it is important that this principle doesn't simply reflect consumerist notions of 'learner voice' (e.g. 'value for money', student 'satisfaction' levels, the simple acquisition of qualifications etc) but instead is underpinned by the idea of students as 'active participants' in the educational process. While the QAA have been working with the NUS to promote a more participatory vision for student learning (for example, in the discussion paper 'Rethinking the values of higher education – consumption, partnership, community?'), the bulk of new quality assurance initiatives - most notably the Key Information Set – reflect consumerist notions of education. We are concerned that the new funding regime will result in the entrenchment of a marketised model of higher education which will have a detrimental impact on quality and standards in the sector. We call on the QAA to highlight the dangers of a fully marketised approach to quality assurance and enhancement.

## *Proposed structure for UK Code of Practice for standards, quality and enhancement*

We endorse the decision to make a clearer distinction between standards and quality in the new Code of Practice, although in some areas there is an inevitable degree of overlap. For example, the section on assessment and externality could equally be included in Part 1 ('setting and maintaining threshold academic standards') whereas programme level material (A3) might also have been included in the section on 'assuring and enhancing academic quality' (Part 2).

In terms of specific proposals, we welcome the inclusion of new guidance on 'learning and teaching' (B3, p.9). While the Higher Education Academy produces guidance on issues such as e-learning, learning and teaching strategies etc, it would be useful to bring this within the Code of Practice. We believe that good practice in relation to staff development should form part of the new guidance. It is important that academic staff and not simply quality assurance managers are actively involved in the production of the new guidance.

### **Consultation question 3**

*The two areas highlighted for future work are the status of credit frameworks and provision of information at programme level. Do you agree that these should be priorities for future work? Do you agree that in due course the Code of Practice should include a Part C on Information?*

We support the proposal to make the status of credit frameworks one of the priority areas for future work. An integrated credit framework in England remains one of the best ways to promote the mobility of students across the HE system.

Public information is becoming an increasingly important feature of the UK quality assurance system (for example, the establishment of the Key Information Set (KIS) and the growth of student charters). The decision to make the management of public information a formal judgment in the new system of institutional review - rather than a comment as is currently the case - will make it necessary for the QAA to provide additional guidance to institutions and staff. However, we are not yet convinced that 'public information' requires a separate Part C as it may be possible to include it as a discrete section under the heading of 'assuring and enhancing academic quality'.

### **Consultation question 4**

*Will the UK Code of Practice make clear how UK higher education providers set and maintain threshold standards and assure and enhance academic quality? Is the name 'UK Code of Practice for standards, quality and enhancement in higher education' appropriate?*

The UK Code of Practice is primarily designed for quality assurance experts in mind. Given the complexity of the material we recommend the publication of a short executive summary of the Code of Practice. It should be clear, concise and written for non-specialist audiences (students, parents, politicians etc) and outline the ultimate purpose of the Code.

We support the decision to move away from the use of the term 'Academic Infrastructure', which is little known outside the quality assurance community, and to include the words 'quality' and 'standards' in the title. We also welcome the reference to the term 'enhancement' in the title, particularly if that implies a movement away from a compliance-based approach. However, if the word 'enhancement' is to appear in the title it will be important to offer a definition of that term.