



WALES CYMRU

RESPONSE TO: HEFCW consultation on the Quality Assessment Framework for Wales

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The University and College Union (UCU Wales) represents almost 7,000 academics, lecturers, trainers, instructors, researchers, managers, administrators, computer staff, librarians, and postgraduates in universities, colleges, adult education and training organisations across Wales.

UCU Wales is a politically autonomous but integral part of UCU, the largest post-school union in the world.

UCU was formed on the 1st June 2006 by the amalgamation of two strong partners – the Association of University Teachers (AUT) and the National Association of Teachers in Further and Higher Education (NATFHE) – who shared a long history of defending and advancing educators' employment and professional interests.

We welcome the opportunity to respond to the consultation on the Quality Assessment Framework for Wales.

UCU Wales agree that the quality of HE in Wales is of paramount importance, both in terms of international reputation and student experience, however we have grave concerns that linking to the proposals in the White Paper will achieve this.

In a recent statement, UCU General Secretary, Sally Hunt said:

'Everyone knows the importance of teaching, but it is hard to see how many of the measures which have been proposed for the teaching excellence framework (TEF) will either measure quality or improve it. UCU believes a critical weakness of our current system is the precarious employment of university teachers, 49% of whom are on insecure contracts. The best way to raise teaching quality is to ensure that academic careers in the UK are attractive to the brightest talent at home and abroad, but this needs an investment in the workforce that has been lacking for many years.'

In light of this, we offer the following comments in answer to your questions.

Are there any other Wales-specific elements which should be included in the baseline?

HE Code of Governance.

UCU Wales would like it to be noted that they would welcome a review of the current governance arrangements in Wales. We believe that new measures are necessary to ensure that the governance of higher education institutions is democratic, representative and transparent, not only to promote public confidence but also that of the staff and students who learn, teach and carry out research. A number of recent examples of ill-advised financial decisions at institutions in Wales, including remuneration packages for senior staff, highlight the need for the inclusion of staff and students in the membership of governing bodies with a regulatory framework which ensures their full and active participation in all areas of governance of their institutions.

Are there any other cross-cutting issues which should be considered?

There needs to be recognition of the role of the staff who deliver teaching and learning. High quality education is dependent on those who deliver it and who provide support to students. For example, ensuring that teaching staff have manageable workloads, secure contracts and adequate time to carry out their role, would go a long way to enhancing the quality of provision in HE. Complying with international quality expectations or student feedback, will do nothing to improve quality if such issues are not addressed. It is therefore crucial that the voice of teaching staff is also included in any quality assessment framework introduced in Wales.

Are there any other areas of comparability across the UK which should be considered?

Whilst it is important that standards in Wales should be at least equal to other nations, to enable employment opportunities for our students, we should not accept a framework that measures quality of education, using metrics that are not the most appropriate. We should be cautious of employment outcomes being a measure of quality of teaching as this relies on job availability, which may not be available equally to all graduates across the UK.

Do you have views on these statements, and the potential for aligning with the statements to be used in England and Northern Ireland?

No so much on the individual statements, but on the underlying metrics. UCU Wales are concerned about alignment with England in light of the HE white paper and the use of the TEF. Whilst it would initially make sense to be comparable to England in terms of ease for students, parents and employers; has England got it right? We are not convinced that the TEF is an appropriate or accurate way to determine quality in HE.

HEFCW proposes to consult further on features and judgments, of this process, including ensuring that judgements align with on the HEFCE arrangements. What should this cover?

As above, we do not believe that the following really measure quality in HE. They may be measurable outcomes of the process, but they do not provide an accurate assessment of the quality of the process.

- over/under-recruitment patterns;
- non-progression rates;
- non-completion rates;
- NSS outcomes;
- degree outcomes, including differential outcomes for students with different characteristics
- employment outcomes;
- TEF outcomes

We would like to see more emphasis on quality enhancement as opposed to quality assessment. Quality assessment based on such

metrics, is counterproductive to innovation in teaching and learning as it becomes a 'high stakes game' linked to fees, funding and ultimately jobs; such assessment is more likely to increase risk-averse behaviour as the cost of 'failure' will be too high. In our opinion the focus should be on the enhancement of quality, through the professionalisation of the teaching staff, not the measurement of quality through measurable but flawed targets.

Are there any other areas of scrutiny which should be included for Wales?

UCU Wales would like to see some support mechanisms alongside the scrutiny, particularly for HEI's that are not 'up to the mark'

Are any additional actions or information required to ensure the views of students are captured effectively?

There is adequate opportunity for student's views to be captured. However there is a distinct lack of opportunity for teaching staff to contribute their views to the processes that will enhance the quality of the HE experience. The professional opinion and judgement of academic staff should be considered an essential part of any quality assessment process. Here we should perhaps diversify from England and take a lead in promoting the professional role of teaching staff in our education system

Do these proposals provide sufficient support for governing bodies? If not, please indicate what else might be helpful?

As previously mentioned, UCU Wales would welcome a review of the current governance arrangements in Wales. We would like to see the inclusion of staff and students the membership of governing bodies and not just an 'expectation' that governing bodies will contain staff and student members.

We believe that new measures are necessary to ensure that the governance of higher education institutions is democratic, representative and transparent, not only to promote public confidence but also that of the staff and students who learn, teach and carry out research. The role of the Board of Governors should not simply be a 'rubber stamping' exercise; it should be that of the 'critical friend', challenging when necessary. Therefore there is a need for governors with understanding of the crucial, yet unmeasurable aspects of education, which would require support and training.

Is anything else needed as part of our quality process, particularly regarding quality which is likely to become inadequate?

Care must be taken that targets are not inappropriate, for example is it right to label provision as inadequate when expected employment targets are not reached, if the jobs are not available? Which begs the question, should HE only be used for the purpose of gaining employment? We do not believe that it should. The effects of higher education in Wales are wide ranging; individual student futures are formed, lives are transformed, thousands of people are employed and economic growth is stimulated. Higher education promotes social

cohesion, civic engagement and health and wellbeing. It provides much more than higher qualifications for individuals; it underpins much of what it is that makes Wales a vibrant, thriving and globally competitive nation.

Students should not simply be viewed as consumers buying a qualification, for which they provide a score; they should be seen as partners in striving for an education, in which they have shared responsibility with staff.

As previously stated we have concerns about scrutiny without support and would like to see arrangements for the assistance of provision deemed likely to become inadequate.