

Review of the Quality Enhancement Framework: NUS Scotland Submission

Introduction and summary

NUS Scotland welcomes the opportunity to respond to this consultation on the Quality Enhancement Framework. The QEF is the centrepiece for quality arrangements in Scotland, and it continues to support and encourage a culture of collaboration and openness in the higher education (HE) sector. NUS Scotland continues to support the principles of the QEF, including its commitment to the promotion of the student voice and the inclusion of students as partners in quality arrangements. However, with ongoing developments in the HE across the UK and in Scotland, we believe that the QEF should be adjusted in order to remain relevant in this changing climate.

In summary, we believe:

- Student engagement and public information should not be a stand alone pillars within the framework, but ought to be considered as key principles that are embedded throughout the whole framework.
- A review of the role of and the support available to student members on committees should be conducted in order to ensure that the student voice within the QEF is meaningful.
- The ELIR cycle should remain a four year cycle.
- ELIR reports should form a key part of public information for potential students.
- The entire post-16 learner journey should be reviewed under the same quality arrangements, including higher education at college and degree level apprenticeships.
- In order to encourage greater student participation in setting the direction of the Enhancement Themes, the themes should be focussed on outcomes and have clear goals and targets.
- A student engagement survey should be created to sit alongside the National Student Survey.
- A specific Scottish public information set would not be advantageous to potential students, instead more effort is needed to ensure that the information produced for the Key Information Sets is accurate and useful to potential and current students.
- A Teaching Excellence Fund should be created in order to help measure improved quality of learning and teaching.

Who is NUS Scotland?

The National Union of Students Scotland (NUS Scotland) is a voluntary membership organisation which makes a real difference to the lives of students and its member students' unions. We are a confederation of students' unions across Scotland, representing around 500,000 students.

NUS champions students to shape the future of education – and create a better world. We promote, defend and extend student rights.

How our consultation response was put together

NUS Scotland is a democratically run organisation, campaigning on issues that affect our members. Policy passed at our democratic events guide the work of NUS Scotland. In addition to existing policy, this response was formed through extensive consultation with our member students' associations. This included an event jointly organised by NUS Scotland and sparqs, with university and college student officers in attendance.

A changing landscape

Since the creation of the QEF in 2003, there have been many changes in higher education across Scotland, and the UK as a whole, in relation to quality, and expectations of purpose, of higher education. In light of these changes, NUS Scotland has formed its response to reflect these ongoing changes, and in anticipation of future challenges in maintaining a high quality education experience for students in Scotland. In particular, we believe that the following areas have the most significant impact on higher education and students' experiences.

- Learning journeys and Post-16 Education Act
- College regionalisation
- Employability and Developing Scotland's Young Workforce
- Outcome Agreements
- A perceived marketisation, including increased tuition fees, in the rest of the UK.
- Internationalisation
- Curriculum for Excellence
- UHI and SRUC as 'tertiary' institutions

Principles NUS Scotland supports

NUS Scotland fully supports the culture of collaboration and enhancement that embodies the Scottish higher education sector, which often stands in contrast to the approach taken elsewhere in the UK. We have experienced first-hand the benefits to students' associations when institutions are willing to engage with students as partners in their

learning. We believe that the sector's willingness to be open and transparent with itself is the strong foundation that propels the sector towards shared changes and evolutions.

Student engagement is another key principle which is well-established principle in the Scottish higher education sector. Students as partners, in their learning and wider aspects of student life, is a strong concept within higher education and is further supported through the work of NUS Scotland and sparqs with students' associations and members of university staff.

The enhancement-led approach encourages the Scottish higher education sector to continually improve and move forward. We believe that an open approach to improvements in education is a more supportive environment for students' associations to operate in and has led to meaningful partnership between universities and students' associations.

Governance of Quality

NUS Scotland is strongly supportive of the collective sector ownership and governance of the HE quality arrangements. We believe the Scottish Higher Education Enhancement Committee (SHEEC) is a crucial element of this collective, collaborative approach, and we welcome our membership in SHEEC and other relevant committees such as the University Quality Working Group.

However, the overall student voice on these committees, especially SHEEC is less certain. In order to ensure that all stakeholder who participate in SHEEC, and other relevant committees, understand and appreciate the role of student members, the selection of student who sit on these committees ought to be more transparent and open, and more support should be made available to these students. Often, student members, once on SHEEC, do not have a clear constituency or means of feedback to students more widely, thus diminishing their role and ability to give a meaningful contribution to the work of the committee. If the student members on SHEEC had a clear constituency and structured way of engaging with their constituent members, then it is more likely that the student members would be able to contribute in a more meaningful way, lending a more authoritative student voice and steer to the work of SHEEC.

NUS Scotland is considered to be the representative voice for students in Scotland, and as such, we should be fully involved in national decisions on learning and teaching. In partnership with sparqs, NUS Scotland co-ordinates Education Core group, a mechanism created to support students who sit as representatives on national learning and teaching committees. Education Core group is open to any student who sits on a committee, including those students whose students' associations are not affiliated to NUS Scotland. Another key function of Education Core group is to identify those students who are able to sit on committees, matching students with an interest and ability to commit to the

demands involved in participating effectively. We believe that an increased role for the Education Core Group in supporting student members of SHEEC could have a positive contribution to the work of the committee and to the student members who sit on it. Thus, we recommend that the role of Education Core group is reviewed in line with the needs of sector agencies committees in order to ensure that students who sit on committees have adequate support for their roles.

Quality Enhancement Framework Pillars

We believe that, broadly, the theory and methodology of the Quality Enhancement Framework is fit for purpose. However, we think that the student engagement and public information pillars do not fit comfortably with the other three pillars and should instead sit to the side of the framework, as stand-alone areas. Instead, student engagement and public information should be key principles that are embedded into the other pillars.

Although student engagement has grown exponentially since the framework's conception in 2003, student officers are still concerned that their involvement is often tokenistic on the part of the institution as they are used to consult on student opinion rather than be partners in decision making. More effort is required to support students' associations, and all levels of representation, to engage in all levels of decision-making.

Enhancement-led Institutional Review (ELIR)

The forward-looking enhancement model of reviews is an asset to the Scottish sector, as it ensures that institutions are looking ahead preparing for future changes in the student learning experience. However, we are concerned that there's no deterrent or meaningful consequences for institutions that do not do well in ELIR to improve their performance. We are also concerned that it is too easy for institutions to get a statement of full confidence.

We believe that the ELIR process can be difficult for students to participate in, and it is important that there are regular points for the students' association and institution to discuss how things are moving forward. One of these opportunities is 'annual discussions', which some institutions have suggested become more light touch. We are not in favour of such an approach as we think there is a lot to be gained from ongoing structured discussions with QAA Scotland, the institution and the students' association. In particular, we think that student engagement could be strengthened and 'A Student Engagement Framework for Scotland'¹ is a good resource to help establish more formal and informal ways that students can be involved in ongoing ELIR activities.

¹ [A Student Engagement Framework for Scotland](#), 2012

Additionally, some institutions have suggested that the ELIR cycle is too intense, and should be longer. Specifically, they have suggested that the current four-year cycle should be extended to a six-year one. We are not in favour of this suggestion, as the proposal would mean that it would become harder for students to be continuously involved in the process. This is because a six-year cycle would be out of sync with a four-year long degree.

The outcomes of ELIR are useful descriptions of an institutions' performance and what their priorities should be going forward. These outcome reports are already available to the public, but they are not scrutinised by the public as much as they should be. There needs to be better public scrutiny for institutions, so ELIR outcomes should be more widely used by the public for determining what makes a good institution. In its present format, ELIR outcome reports are very technical, and not accessible to the general public. NUS Scotland would welcome the opportunity to work with QAA Scotland to make ELIR outcome reports more accessible to potential students and other members of the public.

Provision of higher education continues to change and expand. On the back of college regionalisation, colleges have grown and expanded some of their provision. There are now colleges that provide more higher education than further education. Higher education delivered at colleges is at the same SCQF level as year one and two at university. However, NUS Scotland's report *Learning Journeys*² found that students who articulated to university or entered through advance standing were less likely to engage in their learning experience than those who had been at university from first year. Therefore, all higher education delivered in colleges and universities should be reviewed under the same method, ensuring a more joined-up approach in articulation and progression, but also an enhancement led approach to the entire post-16 learner journey.

Recommendations

- All higher education delivered in colleges and universities should be reviewed under the same method, ensuring a more joined-up approach in articulation and progression, but also an enhancement led approach to the entire post-16 learner journey.
- ELIR cycle remains a four-year cycle.
- ELIR outcome reports more accessible to potential students and other members of the public, increasing the importance of ELIR reports.

² Learning Journeys. Student experiences in further and higher education in Scotland. HEA, NUS Scotland 2013

Institutional-led Review (ILR)

While NUS Scotland is broadly supportive of the methodology and principles of the institutional-led Review process, in practice, we think more could be done to utilise ongoing student engagement and representation of students in the reviews. Students, sometimes including student officers, have very little knowledge of Institutional-led Reviews, despite these potentially providing an important opportunity for great change to happen within an institution and students' experiences. Thus, students' associations need to be more involved in this process. Therefore, we strongly recommend that the sector works more closely with sparqs to develop more meaningful student engagement in ILR.

We also think that the findings of ILR could be shared more widely both within the institution and across the sector, as there is a need for more subject-level enhancement activity. This would allow staff and students to celebrate and share innovative and successful teaching practices, spreading this further across an institution and the sector as a whole, with a particular emphasis on curriculum design with students' as partners.

Although we believe ILR to be broadly fit for purpose, we think that out of all the pillars of the current Quality Enhancement Framework, IRL is the one that is the most underdeveloped but could have the potential to make a bigger positive impact across quality in the Scottish HE sector.

Recommendations

- We strongly recommend that the sector works more closely with sparqs to develop more meaningful student engagement in ILR, as it is the least developed pillar in terms of student engagement.

Enhancement Themes

Enhancement Themes are a key part of the Scottish Higher Education Sector and form the cornerstone of sector collaboration. Thus, NUS Scotland believes the enhancement themes ought to be celebrated and should continue to be part of the Scottish sector, across both university and college, further education and higher education.

However, we have concerns that currently, the impact of Enhancement Themes are not fully experienced by students. Thus, more needs to be done to demonstrate meaningful impact of the Themes on the student experience. Our member students' associations have highlighted concerns regarding the lack of outcomes for the Enhancement Themes, which has, in some cases led to a lack of engagement from students in the themes. If the Themes were linked to clear outcomes, students' associations would be better able to participate in them. Thus, we urge QAA Scotland to work with institutions and the

Enhancement Themes steering group to identify and articulate clear outcomes for the Themes' work.

NUS Scotland welcomes the additional funding for student-led projects related to Enhancement Themes. This funding allows students' associations to work on learning and teaching projects that would usually not be covered by the associations' budgets. We hope that, as a result of this seed-funding, student-led projects will continue to be a key feature in Enhancement Themes work.

Although there are good practices developing from Enhancement Themes, we have also been concerned in recent years that the Enhancement Themes are not owned by the wider sector and therefore the sector doesn't engage with the Themes. Therefore, more could be done to work with other sector agencies and institutions.

Enhancement Themes have had a noticeable impact within our universities; however, as is the case in other areas of policy we believe that there is merit in ensuring that we look across tertiary education, and that we focus on teaching quality and enhancement in both universities and colleges. As such, we think that there is a place for more partnership working with the Higher Education Academy, Equality Challenge Unit and College Development Network, to ensure that all higher education, no matter where it is delivered, receives the benefit of Enhancement Themes.

We think that more partnership working between QAA Scotland, NUS Scotland and sparqs is needed to ensure that student engagement across Enhancement Themes is the best it can be. Specifically, we think that the student network should be run by sparqs and NUS Scotland, as the two organisations are best placed to work with students. sparqs is already funded to ensure student participation in quality, and does so very effectively. Thus, there may be some duplication in terms of funding and purpose. Equally, NUS Scotland also holds regular events with students and is best placed to ensure adequate student representation and engagement with the Themes. In addition to increased involvement of NUS Scotland and sparqs, we believe that the review of the role of the Education Core Group in the governance of the QEF as mentioned above would significantly enhance student engagement with the Enhancement Themes.

Recommendations

- QAA Scotland to work with institutions and the Enhancement Themes steering group to identify and articulate clear outcomes for the Themes' work.
- The Enhancement Themes student network should be run by sparqs and NUS Scotland, as the two organisations are best placed to work with students. sparqs is already funded to ensure student participation in quality.

Public Information should be of good quality, accurate and used to keep institutions accountable for the significant amount of funds they rightly receive from the government and private bodies to fulfil their learning, teaching and research responsibilities. There are many different forms of Public Information, with their use varying across the sector.

The quality process in Scotland currently generates a vast amount of information including ELIR review reports; Thematic Outcomes; and Enhancement Themes reports, otherwise known as quality outputs. However, these types of information are not currently utilised as a form of public information. We think that these quality outcomes should be used more to inform current and potential students about learning and teaching quality at a Scottish institution. We also believe that the use of quality outputs as public information could enhance student engagement with the QEF, as they are centred on outcomes for improvement.

The National Student Survey (NSS) has grown in importance to the Scottish sector, driven by the market-led education system in England. NSS results are used to place institutions in league tables, more often than not for marketing purposes rather than encouraging genuine improvement. Although NSS results have been used by students' associations to successfully run education campaigns and work with their institution on improvements, many students' associations are disillusioned with the process – they believe it to be a marketing exercise instead of true enhancement. Institutions treat their NSS results as their main quality driver, when in fact this role should be reserved to ELIR reviews or other quality outputs, as we've argued above.

We think that NSS should not be seen as a tool for enhancement, or a measurement of student engagement. We recommend that another method is used to measure enhancement and student engagement which could complement the current NSS. This could include a version of the UK Engagement Survey, which is being piloted by HEA. We recommend that a version of NSSE should be implemented and completed by all institutions in Scotland. This survey could be open to students at all levels of study, enabling the sector to identify student engagement trends and areas of enhancement more readily.

We also think that while current forms of public information are targeted at potential students, too little is done to inform current students. For example, student comments about their experiences of modules or courses they have just completed could be invaluable to current students deciding what courses to take in the future. We think that to make public information more meaningful in Scotland, current students should have an active role in informing and using public information to effect change. Particularly

when providing information about current courses, students on those courses are most able to comment on what those courses are like.

The Key Information Sets and other forms of UK wide public information can be problematic since higher education in Scotland can be significantly different from other parts of the UK. We would like more work to be done to contextualise Scottish information to make it truly reflective of the student experience at Scottish institutions, however, we think that having comparable data with RUK is important. We are not in favour of a solely Scottish public information set because we believe that solution will not solve the root problem of the type of information being conveyed.

Recommendations

- Creation of a student engagement survey to identify student engagement trends and areas of enhancement more readily.
- Quality outputs should form some of public information which could enhance student engagement with the QEF, as they are centred on outcomes for improvement.
- More work done to contextualise Scottish information to make it truly reflective of the student experience at Scottish institutions.

Measuring enhancement

The final question the consultation asks is regarding how the quality arrangements could be measured in more concrete ways. We have always been in favour of a better measurement for enhancement, as student officers have often told us that they sometimes see little change at their institutions in this area. We believe that some of this is due to the fluidity of students' associations, with a high turnover of officers. However, another part of it may be due to a lack of direction, or focus on outcomes, of the enhancement-led approach.

We do not think that it would be beneficial to measure the quality arrangements through quantified measurements, many of which already exist in Outcome Agreements. We would anticipate that the setting and fulfilment of targets in Outcome Agreements would be complement quality arrangements, rather than one leading the other. For example, if retention targets for an institution weren't being met and the institution was unable to point to specific factors that contributed to targets not being met, it may be as a result of quality arrangements not being utilised by that institution to support the means to achieve those targets.

Instead of quantified measurements, we believe that institutions and the sector need to become more outcome driven with quality arrangements. The current ELIR cycle asks the

questions *Where are we going? How will we know when we've got there?* These are questions that we think the sector and institutions need to answer and be accountable for. By articulating where the sector or institution is going, and how it's going to get there as a result of tangible outcomes, it will be easier to secure student engagement across the years, and measure progress and achievement.

NUS Scotland has been concerned in recent years over the high status that research excellence has compared to teaching excellence or funds for teaching. Although, there are increasing funds for the university sector, through SFC funds but also through the teaching grant funds released through the Scottish Government's RUK fees arrangements. This was projected to amount to more than £200m per year as the RUK fee system got up to full speed, and gives the option to look creatively at how any additional funding is allocated to universities.

One option we would like to see considered for this additional funding is a Teaching Excellence Fund. The fund would provide competitive funding to institutions based on the quality of their teaching and on bids for funding around new and innovative ideas for enhancing learning and teaching. This could go some way to addressing any imbalance between the priority universities give to research and teaching activity. It could also introduce incentives to institutions – beyond those that already exist – to think more innovatively about their teaching and enhancement practices, as well as their research. Through this Teaching Excellence Fund teaching innovation and enhancement would have to be evidenced and measured, and this could be an area to explore when considering measuring the impact of enhancement.

Recommendations

- Creation of Teaching Excellence Fund to addressing any imbalance between the priority universities give to research and teaching activity.

A vision for the future

Many changes are on the horizon for quality arrangements in Scotland, including developments that will continue to change higher education provision, with advance level apprenticeships. NUS Scotland is fully supportive of the Scottish Credits and Qualifications Framework (scqf). The scqf is innovative and secures learning objectives across the variety of education providers. We believe that universal use and understanding of scqf would help achieve parity of esteem between education delivered at college and other places, and education delivered at university. We believe that scqf level 7 onwards delivered at colleges and universities—no matter what the mode of delivery—should be reviewed under the same quality arrangements. This would future-proof the sector for upcoming changes with the introduction of advance apprenticeships and more higher education being delivered in colleges.

**For more information on anything contained within this submission,
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