**UCU Wales Response – HEFCW Quality Assurance Framework**

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. We welcome this opportunity to respond to the HEFCW’s call for comment around the proposed Quality Assurance Framework.

1: UCU Wales notes that whilst the proposed QAF makes frequent reference to providers, students and reviewers, it fails to outline any direct role for academic staff except in relation to policing academic integrity at point 52.

2: Given that the objective is to assure and enhance quality, this constitutes a significant omission. A brief review of texts dealing with quality enhancement (Parsi Sahlberg; *Finnish Lessons 3.0*, Andy Hargreaves; *Professional Capital*) demonstrates the importance of peer collaboration and collaborative professional learning. They also indicate that attempts to enhance quality solely through metrics are more likely to result in standardization.

3: Any meaningful attempt to enhance quality must take account of individual academic freedom, staff wellbeing and workload. Academic freedom provides the opportunity for professional reflection whilst wellbeing and a manageable workload affords the space to improve one’s practice. Similarly, quality assurance and quality enhancement processes will work far more effectively when a functioning Senate retains the capacity to challenge the worst excesses of managerialism.

4: Welsh Government’s policy direction acknowledges the advantages of working collegiately to enhance delivery. The Future Generations and Wellbeing Act outlines 5 interconnected Ways of Working (Thinking of the Long Term; Prevention; Integration; Collaboration and Involvement). Similarly, it is anticipated that the Social Partnership and Procurement Bill will further refine this statutory approach.

5: With respect to the duties which the QAF places on governing bodies, UCU Wales proposes that issues around access to genuine professional learning, individual academic freedom, wellbeing and workload should also stand as active matters for the consideration of university councils and quality committees. Moreover, governing bodies and committees need to be balanced in such a way as to ensure that staff can co-direct the process of quality enhancement. We compare this to a system whereby efforts are directed by metrics and outcome measurements.

6: For instance, in HEFCW’s digest of consultation responses, it was stated that; *“Documentation: The majority of respondents agreed with the proposal to replace the self-evaluation document (SED) with some form of live documentation process, to ensure that quality assurance and enhancement were embedded in institutional activity”.* It is difficult to see how this can be achieved unless staff are bought directly into the process. Also, will the focus on ‘live documentation’ increase the burden of data capture? If institutions are capturing data, there needs to be certainty around its strategic purpose.

7: A comparison between the QAF and the Standards and Guidelines for Quality Assurance in the European Higher Education Area ([ESG](https://enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf)) reveals how the latter provides a more meaningful attempt to outline how investment in academic staff can promote quality assurance and “student centred practise”;

*1.5 Teaching staff Standard: Institutions should assure themselves of the competence of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff. Guidelines: The teacher’s role is essential in creating a high quality student experience and enabling the acquisition of knowledge, competences and skills. The diversifying student population and stronger focus on learning outcomes require student-centred learning and teaching and the role of the teacher is, therefore, also changing (cf. Standard 1.3). Higher education institutions have primary responsibility for the quality of their staff and for providing them with a supportive environment that allows them to carry out their work effectively. Such an environment*

*- sets up and follows clear, transparent and fair processes for staff recruitment and conditions of employment that recognise the importance of teaching;*

*- offers opportunities for and promotes the professional development of teaching staff;*

*- encourages scholarly activity to strengthen the link between education and research;*

*- encourages innovation in teaching methods and the use of new technologies.*

Whilst not perfect, in addition to providing a coherent rationale, the ESG also locates staff in the process (“Internal stakeholders should develop and implement this policy through appropriate structures and processes, while involving external stakeholders.”) and links to concepts and concerns such as academic freedom, the rejection of discriminatory practise and workload.

Given that HEFCW uses the ESG as a “key reference point”, it would be sensible to use the document as a foundation around which the missing aspects of collaboration and collegiate governance can be built.

8: Whilst we except that this is a top-line framework, apart from references to ‘external stakeholders’, there seems to be very little thought or detail around how quality enhancement can be promoted through collaboration with business or Universities wider role in the Welsh economy. There is little point in measuring employment outcomes if institutions are not engaging with the employers who (through partnership and active collaboration) they seek to develop and feed. Nor is this likely to be addressed by the mere inclusion of business leaders on the governing body. Rather, there needs to be a coherent process which brings together the voices of students, academic staff, and socially rooted Welsh business/public sector employers so that collaborations can be forged, and ideas tested.

9: Since HEFCW envisages working with Scotland and Northern Ireland, we briefly reviewed some materials produced by the Scottish Funding Council.

* [**Quality Enhancement Framework**](https://www.sfc.ac.uk/quality/quality-universities/quality-universities.aspx)**: “***The Quality Enhancement Framework (QEF) is Scotland’s distinct enhancement-led approach to quality assurance, with a focus on continuous improvement, partnership working and student engagement.”* Taken together, the public-facing framework and associated links from QAA Scotland provide a greater focus on collaboration, professional development and staff led opportunity.
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Significantly, the author of this submission can find no comparable section on the HEFCW website.

* [**The Enhancement Themes**](https://www.enhancementthemes.ac.uk/en/home) “*are a programme of activity involving the whole higher education sector in Scotland. Staff and students collaborate on one or more topics to improve strategy, policy and practice. Watch our video to find out more*.” Superficially, this project appears to provide a basis for the sort if collaboration that UCU Wales recommends.

10: In the absence of a funding council, the situation is less clear in Northern Ireland.

11: To conclude, although UCU Wales welcomes the move towards quality enhancement, the QAF currently lacks any mechanism through which professionals can engage around their own practice. In its absence, we are concerned that a metrics-led approach might not only lead to mission drift but also leave staff with the impression that ‘things are being done to them – not with them’. Suffice to say that this is not the way in which quality is enhanced. UCU Wales proposes that HEFCW re-examine its framework in line with the Future Generations Ways of Working with a focus on how governance objectives and institutional practice can be re-pointed to support genuine collaborative quality enhancement. We also propose that HEFCW consider best practice emerging from Scotland and elsewhere in Europe.