

CONSULTATION RESPONSE

De-designation of QAA as the designated quality body in England

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<https://consult.education.gov.uk/he-quality-and-regulation/de-designation-of-qaa-as-the-designated-quality-bo/>

DO YOU AGREE THAT THE DESIGNATION OF THE QUALITY ASSURANCE AGENCY FOR HIGHER EDUCATION AS THE DESIGNATED QUALITY BODY FOR HIGHER EDUCATION IN ENGLAND SHOULD BE REMOVED, ON THE BASIS SET OUT ABOVE?

1. No.

COMMENTS

2. MillionPlus understands that it is QAA who have taken the decision that they no longer wish to be designated, which is a legitimate reason under the Higher Education and Research Act (HERA) for their de-designation. However our response of 'no' is based on our concern over the need for a stable, autonomous and well-trusted system of quality assurance.
3. While the QAA would no longer be the designated quality body (DQB) in England, they would remain responsible for quality assurance in the devolved nations. Therefore their de-designation in England would create a further fragmented system of quality assurance across the UK. This matters as internationally, the reputation of the higher education is seen as a strong UK-wide brand. These moves, which would take England further away from aligning with international standards, risk damaging the reputation of the whole of the UK higher education system.
4. Secondly, in order for the higher education system to be seen as high quality, it is important that the quality assurance has autonomy. The Office for Students temporarily taking on the quality and assessment activity, will mean the regulator is both setting the standards and responsible for enforcing them. While HERA does allow for the OfS taking on this role, schedule 4, part 2, in reference to the oversight arrangements of the DQB states '[The OfS must make arrangements for holding the designated body to account for the performance of the assessment functions.](#)' It is therefore unclear whether the OfS could perform both roles without risk of conflict.
5. While the consultation references the Office for Students taking on the roles of the designated quality body on an interim basis, there are no obvious alternative organisations that could take on this role on a longer term basis. Schedule 4, part 1 of HERA states the importance of ensuring the designated quality body '[commands the confidence of registered higher education providers](#)'. Due to the challenges identified above, it is not clear this would be the case for the OfS. Therefore, while MillionPlus understands the rationale for the Department seeking the de-designation of QAA as designated quality body, we cannot support the removal of their designation while we do not have confidence in the strength of the alternative arrangements, due to the potential of risk to the quality and/or perceived quality of our UK higher education system.