This document is published in English and Welsh

The UK Quality Code for Higher Education Consultation

Online survey questions

April 2024

> This document provides a copy of the survey questions to help you when preparing your response. Please use the online survey to submit your response.
>
> Please note that the survey needs to be completed in one sitting. Once the survey has been submitted you will not be able to change your answers.
>
> If you have any queries about the redevelopment of the Quality Code, please contact: membership@qaa.ac.uk

Contents

Introduction

Thank you for taking the time to engage with the redevelopment of the UK Quality Code for Higher Education (Quality Code).

Before answering the questions in this survey, please read the proposed Quality Code and the accompanying consultation document where you will also find the questions in this survey. You can find both these documents on our [consultation web page](#).

The Quality Code has been a cornerstone of the UK higher education system since its inception as the 'academic infrastructure' in the 1990s. Its format has changed over time, but it has always articulated the sector-agreed fundamental principles for the academic standards and quality of higher education across the UK. In the current redevelopment process, our intention has been to create a Quality Code that is capable of being used in tertiary settings. It will continue to act as a basis for the assurance of standards and quality, regardless of the size of the provider or the context in which they operate.

As the Quality Code has regulatory status in many parts of the UK, we believe a formal consultation is an appropriate final step before finalisation and publication.

We are seeking feedback from all stakeholders - in particular higher and further education providers, sector bodies, quality practitioners, academic staff, professional services staff, students' unions/associations or guilds, and students.

We have had good engagement with stakeholders throughout the redevelopment process. As a result, this consultation may cover ground that some have already commented on. However, as a final point of contact before implementation we have presented both an overall picture of changes from the last version we released for consultation (in November 2023) and an opportunity for those who may not have responded previously to give their views.

The online consultation survey

The survey consists of five sections:

- Section 1: asks for your details

- Section 2: confirms the approach taken to redeveloping the Quality Code

- Section 3: seeks overarching commentary on this new version of the Quality Code

- Section 4: invites your views on the Sector-Agreed Principles and Key Practices

- Section 5: focuses on new terms added to the draft Glossary in response to feedback

Sections 3, 4 and 5 ask for feedback on sections of the Quality Code that have been amended in response to feedback received during the November-December 2023 discussions and survey.

Next steps

The [online survey](#) opens on Monday 8 April 2024 and closes at 5pm on Friday 17 May 2024.

We aim to publish the finalised Quality Code on 27 June 2024.

Section 1: Respondent details

This section captures respondents' details. All answers provided will be treated confidentially and will not be attributed to any individual or organisation in any published analysis report. No personal data will be shared with third parties. Any results reported after the survey will only be in aggregate form, and individual responses will not be identifiable. Further details are available in our [privacy notice](#).

1a)   Name:

Charlotte Bonner

1b)   Name of Institution/Organisation:

The Environmental Association for Universities and Colleges (EAUC)

1c)   In what capacity are you responding?

Multiple choice (required)

- As an individual
- On behalf of a higher education provider
- On behalf of a further education provider
- On behalf of a sector body/organisation
- Student representative body
- Other (please state)

1d)   Where are you (if responding as an individual) or your institution/organisation located?

Multiple choice (required)

- England
- Scotland
- Wales
- Northern Ireland
- UK Wide
- Non UK Europe
- Non UK Outside of Europe
- Other (please state) We also serve post-16 education organisations in the Republic of Ireland

1e)   Role:

Section 2: Approach to development

> **Question 1 - Have you participated in any of the UK Quality Code redevelopment activities?**

Multiple choice (required)

a)   Online events
b)   Responded to the Winter 2023-24 online survey
c)   No, I am coming to this consultation afresh

Section 3: Overarching commentary on the Quality Code

Sector-Agreed Principles

One of the main aims of the Quality Code is to articulate the principles of UK tertiary education for securing academic standards and assuring and enhancing quality.

The Sector-Agreed Principles articulate the features that are fundamental to securing academic standards and offering a high-quality student learning experience. The Key Practices identify ways in which a provider can demonstrate how they are meeting the Principles. In this way, the Quality Code offers a framework on which providers can build their internal practices and which satisfies external requirements.

> **Question 2 - Do the Principles and Key Practices offer a useful framework for developing, supporting and enhancing your internal quality practices and satisfying external requirements?**

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)

Although EAUC, as a sector body rather than a tertiary education provider, doesn't use the Quality Code for our own practices, we recognise the importance of quality, and a standardised framework to our members – to develop consistency, support continuous improvement, enable international recognition and maximise the learner experience amongst other benefits.

We see quality education as a critical part of the sustainable development agenda – not just in its own right ("ensure inclusive and equitable quality education and promote lifelong learning opportunities for all" is the fourth UN sustainable development goal) but as an enabler of other sustainability goals too.

Whereas we support the quality code and its revision, we feel there is an omission of explicit recognition of the critical role tertiary education organisations have in driving, promoting and embedding sustainability, and particularly education for sustainable development (ESD). EAUC has long advocated for institutions to take holistic, whole organisation approaches to

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maximise opportunities for students to engage with sustainability and develop ESD attributes whilst also producing multiple co-benefits for institution. As such, we recognise the role of quality standards and academic quality practices as part of a whole organisation approach. This is supported by other sector publications such as the HE Climate Action Toolkit, Climate Action Roadmap for FE Colleges and the recent Advance HE publication, Framework for Education for Sustainable Development (https://www.eauc.org.uk/climate_action_toolkit, https://www.eauc.org.uk/fe_roadmap, https://www.advance-he.ac.uk/knowledge-hub/framework-education-sustainable-development).

QAA guidance similarly states it is good practice to drive ESD through academic quality practices (https://www.qaa.ac.uk/the-quality-code/education-for-sustainable-development), and the Department for Education's Sustainability and Climate Change Strategy states that all education settings should have sustainability leadership and climate action plans, including plans to deliver climate education by 2025 (https://www.gov.uk/government/publications/sustainability-and-climate-change-strategy/sustainability-and-climate-change-a-strategy-for-the-education-and-childrens-services-systems). Furthermore, although at a very high level, the international education quality standard, ISO21001 was amended in 2024 to include a climate change clause (https://www.iso.org/standard/66266.htm).

In their current guise, the principles and key practices are therefore not as useful as they could be in developing, supporting and enhancing your internal quality practices and satisfying external requirements, particularly with regards to the ESD agenda.

In order to ensure policy alignment and retain excellence in comparison with an international market, we strongly recommend explicit reference to ESD is added to the final version of the 2024 Quality Code revision. This can be done with additions throughout the code, particularly through key practices that relate to principles 1, 2, 3, 4, 5, 7, 8, 9, 10 and 11. Additional amendments to reflect the ESD theme in both the 'How the Quality Code is Used' section and the Glossary would also be welcome. This would integrate ESD within the quality code, in the same way that equality, diversity and inclusion – which in themselves are key elements of ESD - already has been. are not suggesting a new principle or set of standalone key practices.

Therefore, we will respond specifically to the consultation questions about these principles and the glossary of terms. We have some further comments about the integration of ESD which we have outlined in our response to question 31.

Our input has been informed by an EAUC members' meeting specifically scheduled to engage with the Quality Code Consultation (https://www.eauc.org.uk/our_educational_members, https://www.eauc.org.uk/shop/mms_single_event.php?event_id=8837). Many participants shared examples of how their institutions are adapting their academic quality work to drive sustainability and ESD, some of which have come about due to QAA collaborative project funding.

With this revision, QAA has an opportunity to encourage a shift from pockets of effective ESD practice within academic standards and quality work, to a more widespread adoption of these practices, 'raise the bar' across the country, and beyond.

Tertiary education

We have asked the sector throughout the development process about extending the scope of the Quality Code beyond higher education to include tertiary education. This recognises

changes taking place across the UK, notably in Scotland and Wales.

As a result of this feedback, we have stated in the introduction to the 2024 Quality Code that it is applicable to providers working in a tertiary setting: '*This edition of the Quality Code is intended to have application beyond higher education in recognition that many parts of the UK are seeking to develop tertiary approaches to education.*'

We recognise that the establishment of tertiary frameworks and a tertiary focus more widely are evolving areas, and we will continue to develop our approach as we redevelop the Advice and Guidance that will underpin this edition of the Quality Code.

April 2024 consultation draft:

Introduction

The UK Quality Code for Higher Education

The UK Quality Code for Higher Education (Quality Code) articulates the principles of UK higher education for securing academic standards and assuring and enhancing quality. This is the fourth version of the Quality Code since it was first developed in the late 1990s. The Quality Code was originally developed by and for the UK higher education sector. This edition is intended to have application beyond higher education in recognition that many parts of the UK are seeking to develop tertiary approaches to education.

Question 3 - Do you consider that the Quality Code can be applied across tertiary education?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)

Question 4 - In recognition of the fact that the Quality Code will be used in a wider range of settings beyond higher education, what is your view of renaming it as 'The UK Quality Code for Tertiary Education'?

Free text (required)

As a sector body that also serves the diversity of tertiary education providers, rather than just those working in the higher education or further education sector, we too regularly debate the language we use. We've found 'post-16 education' more widely accessible than 'tertiary education' but when communicating with those within the tertiary education sector find this terminology is also widely understood.

Section 4: The Sector-Agreed Principles and Key Practices

Clarity on what constitutes a Principle

Some stakeholders in the engagement events and survey at the end of 2023 requested greater clarity in the way the Sector-Agreed Principles were set out in the November 2023

[draft](#). Specifically, we were asked to clarify the distinction between the introductory title and the content of each Principle.

To address this, we have grouped the title and description into a box with the aim of making it clearer that the principle number, title and description collectively make up 'the Principle'. We have removed the wording 'Sector-Agreed' from the start of each Principle, to reduce repetition. We have also taken a more condensed approach to the title of the Principle, as in this example:

> **Principle 1 - Taking a strategic approach to managing quality and standards**
>
> Providers demonstrate they have a strategic approach to securing academic standards and assuring and enhancing quality that is embedded across the organisation.

Question 5 - Is this a clear format for expressing the Sector-Agreed Principles?

Multiple choice (required)

- **Yes**
- No

Please give a reason for your answer (optional)

Principle 1

Changes made from the [November 2023 draft](#):

- The practice relating to equity, equality, diversity and inclusion has been moved more centrally into the list of Key Practices in response to feedback stating it could be perceived as an 'add on' when appearing at the end of the list. It is worth stating that there is not a hierarchy in the way the Key Practices are presented. The precise wording has also been adjusted to align more clearly with the intention of the Principle.
- An additional Key Practice on engaging external expertise has been included.

April 2024 consultation draft:

> **Principle 1 - Taking a strategic approach to managing quality and standards**
>
> Providers demonstrate they have a strategic approach to securing academic standards and assuring and enhancing quality that is embedded across the organisation.

Key Practices

a   Academic standards and the quality of the student learning experience are the responsibility of each provider. Degree-awarding bodies have particular responsibilities for the qualifications offered in their name.

b   The strategic approach is employed wherever and however provision is delivered and is embedded in the culture and practices of providers.

c   The strategic approach aligns with providers' policies and practices on equity, equality, diversity and inclusion for students and staff.

d   The strategic approach is published and supported by a comprehensive and transparent governance framework that is communicated clearly and is accessible to staff, students and external stakeholders.

e   The strategic approach is monitored, evaluated and enhanced on a regular basis.

f   External expertise is a key element of the strategic approach to managing quality and standards.

Question 6 - Does Principle 1 make it clear what is expected of a provider?

Multiple Choice (required)

- **Yes**
- No

Please give a reason for your answer (optional)

Question 7 - Do the Key Practices under Principle 1 make it clear how a provider can demonstrate alignment to the Principle?

Multiple choice (required)

- Yes
- **No**

Please give a reason for your answer (optional)

We recommend explicit reference to ESD is included in the key practices. This could mimic the structure of the EDI practice: "The strategic approach aligns with providers' policies and practices on education for sustainable development". An alternative approach would be to present EDI and ESD together in the same practice, given that EDI and ESD action can in many ways be complimentary. The practice could additionally provide some 'stretch' by suggesting these policies and practices are in line with sector best practice and/or regularly updated with input from students, staff and relevant stakeholders: "The strategic approach aligns with providers' policies and practices on equity, equality, diversity and inclusion as well as education for sustainable development for students and staff. Policies and practices are updated regularly with input from students and staff to reflect sector best practice."

Recommendations from QAA collaborative enhancement projects relating to ESD and Academic Quality included ensuring alignment between an institution's ESD and quality strategies (https://www.qaa.ac.uk/membership/collaborative-enhancement-projects/education-for-sustainable-development/esd-and-academic-quality). Anecdotally, increasing numbers of institutions are already seeking this alignment in both strategy and operation.

Principle 2

Changes made from the [November 2023 draft](#):

- Principle wording simplified.

- Practice c amended to highlight the need to engage with the full diversity of the student body and reflect the importance of recognising the student voice.

- Practices d and e slightly amended to recognise that not all providers using the Quality Code have a formal student representative body.

- Practice f simplified to reflect current terminology around activities beyond the formal curriculum.

April 2024 consultation draft:

Principle 2 - Engaging students as partners

Providers take deliberate steps to engage students as active partners, individually and collectively, in the design, development, assurance and enhancement of the student learning experience at all levels of study and across the governance framework.

Key Practices

a   Student engagement through partnership working is strategically-led, student-centred and integral to the culture of providers.

b   Student engagement and representation activities are clearly defined, communicated, resourced and supported. Transparent arrangements are in place for the collective student voice to be heard and responded to.

c   Providers demonstrate effective engagement with students, including those who represent the diversity of the student body. Students understand that their voice has been listened to and are aware of how their views have impacted the assurance and enhancement of the student experience.

d   Student engagement opportunities and processes are inclusive of students' characteristics and responsive to the diversity of each provider's student population. They involve student representative bodies, where applicable.

e   Providers and student representative bodies, where such bodies are in place, recognise and celebrate the contribution of students to the enhancement of teaching and learning and the wider student experience.

f   Students are enabled and encouraged to engage actively in the academic governance and enhancement of the wider student experience beyond the formal curriculum.

Question 8 - Does Principle 2 make it clear what is expected of a provider?

Multiple choice (required)

- Yes

- No

Please give a reason for your answer (optional)

Question 9 - Do the Key Practices under Principle 2 make it clear how a provider can demonstrate alignment to the Principle?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)

As suggested in the QAA Advance HE ESD guidance, ESD is enhanced when students are true co-creation partners with their institution - not project leaders, consultees or 'below' staff, but equal in their input, working with staff to develop and improve materials. Our members have shared numerous examples of this increasingly becoming a common practice. It's also an approach being adopted by other sector bodies (such as Professional Statutory and Regulatory Bodies). This message of co-creation, as opposed to engagement, participation and partnership, could be strengthened in the key practices for this principle.

With regards to ESD, through a QAA funded collaborative project, quality standards for sustainability learning in terms of content, assessment, application, how well ESD is integrated across a course etc have been developed, for staff and students to use (https://www.qaa.ac.uk//en/membership/collaborative-enhancement-projects/education-for-sustainable-development/students-driving-curriculum-quality-for-sustainability-developing-criteria-and-tools). We recommend an additional clause to practice f, or a new stand-alone practice, signalling how students can be enablers of change with regards not just to process, but also progress against key change areas such as ESD, EDI, decolonisation etc.

Principle 3

Changes made from the November 2023 draft:

- Principle reworded to emphasise the link between resourcing, strategy and the composition of the student body.

- Practice a amended for clarity.

- Practice c simplified to align it more closely to the Principle.

- Practice e reworded for clarity.

- Practice f enhanced to emphasise the importance of learning environments helping to facilitate a sense of belonging.

April 2024 consultation draft:

> **Principle 3 - Resourcing delivery of a high-quality learning experience**
>
> Providers plan, secure and maintain learning, technology, facilities and human resources to enable the delivery and enhancement of an accessible, innovative and high-quality learning experience for students that is in line with the provider's strategy and the composition of the student body.

Key Practices

a   Strategic and operational plans, along with resources, align with the student journey and are designed and implemented to support a positive student experience and enable student achievement.

b   Providers ensure they have dedicated and accessible human, digital and physical resources to support and enhance the delivery of their programmes and the well-being of students and staff.

c   Resources are reviewed and updated in alignment with strategic and programme developments, as well as staff and student recruitment. This also ensures relevance to the workplace and the wider academic discipline.

d   Resources are allocated to ensure that staff receive ongoing professional development to support and enhance the delivery of a high-quality and innovative student learning experience.

e   Processes and activities to support the management of academic standards and quality enhancement are appropriately resourced to meet strategic, operational and regulatory objectives and requirements.

f   The creation, development and maintenance of accessible learning environments (physical and virtual) offer all students the opportunity to be engaged in their learning experience and facilitates a sense of belonging.

Question 10 - Does Principle 3 make it clear what is expected of a provider?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)

Question 11 - Do the Key Practices under Principle 3 make it clear how a provider can demonstrate alignment to the Principle?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)
As per our response to Question 2, to maximise sustainability and ESD outcomes, we advocate for whole organisation approaches to sustainability. Sustainable operations and

facilities and resource management are a key part of this. Therefore, we recommend an additional practice under this principle to state that "Resources used to deliver a high-quality learning experience are managed sustainably – reducing negative impacts on people and planet whilst maximising positive sustainability outcomes."

Principle 4

Changes made from the November 2023 draft:

- Practice a amended to include the levels at which data is utilised.

- Practice c simplified for clarity.

- Practice e amended to include clarification around the review of partnership data sharing agreements and reporting requirements.

April 2024 consultation draft:

Principle 4 - Using data to inform and evaluate quality

Providers collect, analyse and utilise qualitative and quantitative data at provider, departmental, programme and module levels to inform decision-making with the aim of enhancing practices and processes relating to teaching, learning and the wider student experience.

Key Practices

a A consistent, coherent and evidence-informed approach to the collection, storage and management of data is employed across the provider. The provider makes explicit the type and level of data utilised (such as departmental, programme, module level) and the policies and processes that underpin its use in the maintenance of academic standards and the assurance and enhancement of quality.

b Staff and students are aware of the types of data gathered and how it is stored and used in the management of quality and standards.

c When designing and implementing monitoring and evaluation arrangements, staff and students take account of ethical and data protection requirements relating to gathering and submitting data for national data sets, regulatory purposes, and internal monitoring and evaluation.

d Staff who are required to collect, manipulate and analyse data for reporting and quality enhancement purposes receive training that enables them to undertake these activities effectively.

e Providers in partnership arrangements (including the student representative body, where applicable) ensure data sharing agreements and reporting requirements are clearly stated, understood and reviewed periodically.

f Data is collected and analysed in ways that enable providers to understand and respond to the needs of their student populations, promoting equality, diversity and inclusion.

Question 12 - Does Principle 4 make it clear what is expected of a provider?

Multiple choice (required)
- Yes
- No

Please give a reason for your answer (optional)

Question 13 - Do the Key Practices under Principle 4 make it clear how a provider can demonstrate alignment to the Principle?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)

We recommend explicit reference to ESD is included in the key practices. This could mimic the structure of the EDI practice: "Data is collected and analysed in ways that enable providers to understand and respond to the needs of their student populations with regards to education for sustainable development."

We know there is appetite for such data given the longitudinal engagement with national data collection and analysis services, such as the Sustainability Skills Survey undertaken by SOS-UK (https://www.sos-uk.org/research/sustainability-skills-survey).

Resulting from our engagement with institutions around the QAA collaborative enhancement project on Monitoring and Evaluating ESD in Higher Education (https://www.qaa.ac.uk//en/membership/collaborative-enhancement-projects/education-for-sustainable-development/monitoring-and-evaluating-education-for-sustainable-development-in-higher-education) we further recommend stronger encouragement and clarity around the use of qualitative data. The impact, an important aspect of quality, of what our students learn, to what extent their learning affects to their lives, careers, as well as society, is difficult to capture with quantitative data approaches. However, this is often the default institutions revert to, which people working for education providers have identified as a barrier specifically regarding data on ESD.

We recommend to adapt practice d: "Staff who are required to collect, manipulate and analyse data for reporting and quality enhancement purposes receive training that enables them to undertake these activities effectively. This training includes both quantitative and qualitative approaches.

Principle 5

Changes made from the November 2023 draft:

- Wording of Principle edited for clarity.
- Practice b amended for clarification.
- Practice d amended to emphasise the need for accessibility in communicating outcomes of monitoring and evaluation.
- Practice e simplified for clarity.

April 2024 consultation draft:

Principle 5 - Monitoring, evaluating and enhancing provision

Providers regularly monitor and review their provision and the underpinning policies, processes and practices to secure academic standards and enhance quality. Deliberate steps are taken to engage and involve students, staff and external expertise in monitoring and evaluation activity. The outcomes and impact of these activities are considered at

provider level and conveyed to the governing body to drive reflection and enhancement across the provider.

Key Practices

a   Providers agree strategic principles for monitoring and evaluation to ensure processes are applied systematically and operated consistently.

b   The methods for monitoring and evaluation activity are documented to clarify their aims, objectives, intended actions and targets. They are explicit about how they will be conducted, the nature of evidence (data) to be considered and the form of reporting, along with key indicators of success.

c   Staff and students are engaged in monitoring and evaluation activities and receive appropriate training and support to undertake them.

d   The actions and outcomes from monitoring and evaluation activities are communicated in an accessible manner to staff, students, the governing body and external stakeholders.

e   Improvements and enhancements that have been implemented as a result of monitoring and evaluation are, in turn, monitored and evaluated to ensure their impact is positive and remains fit for purpose.

f   Monitoring and evaluation activity facilitates providers' insights and promotion of equality, diversity and inclusion.

g   Programmes are monitored and reviewed regularly by internal and external peers, employers and students, in line with the provider's strategic approach to quality and standards and that of the relevant professional bodies.

Question 14 - Does Principle 5 make it clear what is expected of a provider?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)

Question 15 - Do the Key Practices under Principle 5 make it clear how a provider can demonstrate alignment to the Principle?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)
We recommend explicit reference to ESD is included in the key practices. This could mimic the structure of the EDI practice: "Monitoring and evaluation activity facilitates providers' insights and promotion of education for sustainable development."

Recommendations from QAA collaborative enhancement projects relating to ESD and Academic Quality included using evaluation data to aid staff development, student co-creation and transparency on how ESD is addressed (https://www.qaa.ac.uk/membership/collaborative-enhancement-projects/education-for-sustainable-development/esd-and-academic-quality) and frameworks for how to effectively monitor ESD practices (https://www.qaa.ac.uk//en/membership/collaborative-enhancement-

This is particularly important given that ESD has been a goal for many institutions for a significant period of time, but monitoring practices are generally still in their infancy. Anecdotally, a lack of clarity around monitoring ESD has been a barrier to its integration, although again, increasing numbers of institutions are overcoming this, developing monitoring and evaluation practices to enhance their ESD outcomes.

Principle 6

Changes made from the November 2023 draft:

- Principle revised for simplicity and clarity and to reflect the differing forms that external review may take, and the different bodies that may require accreditation.

- Practice a amended to reflect the possible different approaches to external review, and to address the status of external review in the regulatory arrangements for providers in England.

- Practice b amended to be less prescriptive and for clarity.

- Practice c amended to reflect the different types of review.

- Practice d amended to reflect that international expertise in external reviews is valued by many providers.

April 2024 consultation draft:

Principle 6 - Engaging in external review and accreditation

Providers engage with external reviews to enable external evaluation of the implementation of their strategic approach to securing standards and assuring and enhancing quality. Reviews and accreditation actively include staff, students and peers. They can be undertaken by representative organisations, agencies or professional, statutory and regulatory bodies (PSRBs) with recognised sector expertise according to the provision being reviewed.

Key Practices

a   External review, whether voluntary or required by national quality frameworks, is built into the provider's strategic approach and aligns to internal quality and standards review activity.

b   Providers recognise that external review and accreditation can act as a catalyst for ongoing improvement and strategic enhancement of the student learning experience. Also, that it promotes reflection and evaluation followed by implementation of the associated actions.

c   Providers acknowledge and support the expertise and resource required to participate in external review and accreditation.

d   Providers who engage in external review understand the UK national regulatory and legislative contexts in which they operate and the different approaches, forms and focus they may take. Providers may engage colleagues with international expertise, in addition to those familiar with UK requirements.

e   Providers understand the requirements and process for external reviews that may be required by regulators in partner delivery locations.

Question 16 - Does Principle 6 make it clear what is expected of a provider?

Multiple choice (required)

- <mark>Yes</mark>
- No

Please give a reason for your answer (optional)

Question 17 - Do the Key Practices under Principle 6 make it clear how a provider can demonstrate alignment to the Principle?

Multiple choice (required)

- <mark>Yes</mark>
- No

Please give a reason for your answer (optional)

Principle 7

Changes made from the November 2023 draft:

- Principle amended for clarity and simplicity.
- Practice a amended to reflect the applicability of The Framework of Qualifications for the European Higher Education Area (QF-EHEA)
- Practice c amended for simplification and clarity.
- Practice e added to reflect the importance of externality in the design, development, approval and modification of programmes of study.

April 2024 consultation draft:

Principle 7 - Designing, developing, approving and modifying programmes

Providers design, develop, approve and modify programmes of study to ensure the quality of provision and the academic standards of awards are consistent with the relevant national qualifications framework. Providers ensure their provision and level of qualifications are comparable to those offered across the UK and, where applicable, The Framework of Qualifications for the European Higher Education Area.

Key Practices

a   All programmes meet academic standards that are consistent with national frameworks and comparable across the UK, and, where applicable, meet The Framework of Qualifications for The European Higher Education Area.

b   A definitive set of documents are produced from the design, development, approval and modification processes, which are held securely and act as the primary source of information about each programme.

c   The award received, and how outcomes of study are recorded and certificated, is made clear to all stakeholders involved in the teaching, learning and evaluation of the programme.

d   Policies and processes that support the design, development, approval, modification and review of programmes are published on each provider's website and easily accessible to key stakeholders.

e   External engagement and evaluation form a component part of the design, development, approval and modification process.

Question 18 - Does Principle 7 make it clear what is expected of a provider?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)

Question 19 - Do the Key Practices under Prin2ciple 7 make it clear how a provider can demonstrate alignment to the Principle?

Multiple Choice (required)

- Yes
- No

Please give a reason for your answer (optional)

Tertiary education institutions are increasingly embedding sustainability and ESD into their quality processes for academic modules, course and programmes. This has been cited as a significant driver for wider engagement from academic staff with ESD. It helps them to question and identify how to best meaningfully embed ESD in their teaching and learning practices, rather than ESD content being delivered as an 'add on'. This integrative approach aligns with how leaners cite they want to learn about, and develop competencies relevant to, sustainability, as opposed to 'add on' content. There are multiple examples of this available through resources associated with EAUC's Realigning Curriculum for the Future Series (https://www.eauc.org.uk/realigning_curricula_for_the_future). Again, QAA is contributing this work, particularly through the establishment of sustainability elements within benchmark statements and the ESD Guidance.

We recommend an additional practice is included: "The design, development, approval and modification process aligns with providers' policies and practices on equity, equality, diversity and inclusion as well as education for sustainable development."

Principle 8

Changes made from the November 2023 draft:

- Principle title changed to better reflect its purpose, and the detailed wording edited for clarity.
- Practice b amended to promote awareness of the different levels of risk associated with partnerships.
- Practice c added to give greater prominence to the importance of written agreements.

April 2024 consultation draft:

Principle 8 - Operating partnerships with other organisations

Providers and their partners have proportionate arrangements with effective governance to secure the academic standards and enhance the quality of programmes that are delivered in partnership with others. Organisations involved in partnership arrangements agree and communicate the mutual and specific responsibilities in relation to delivering, monitoring, evaluating, assuring and enhancing the learning experience.

Key Practices

a   Where academic provision is delivered through partnership, all partners agree, understand, communicate and take responsibility for the maintenance of academic standards and enhancement of quality.

b   Providers are aware that working in partnership with other organisations will involve different levels of risk. Due diligence processes are completed in accordance with

each provider's approach to minimising risk, maintaining academic standards and enhancing quality.

c   Written agreements between partners are signed prior to the start of a programme and cover the lifecycle of the partnership, including details about closing a partnership early.

d   Providers and their partners ensure compliance with the regulatory and legislative requirements of the countries in which they work and maintain an awareness of the cultural context in which they operate.

e   Providers maintain accurate, up-to-date records of partnership arrangements that are subject to a formal agreement.

f   Partnerships are subject to ongoing scrutiny that includes regular monitoring, evaluation and periodic review to assure quality and facilitate enhancement.

Question 20 - Does Principle 8 make it clear what is expected of a provider?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)

Question 21 - Do the Key Practices under Principle 8 make it clear how a provider can demonstrate alignment to the Principle?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)

Again, there are numerous examples of existing practice from across the sector whereby partnerships are used to progress academic standards and quality in tandem with ESD and EDI outcomes. Some of these are internal partnerships (for example through living laboratories or collaboration between an institution and its students' union) and others external (for example thorough partnerships with employers, local anchor institutions and other private, public and third sector stakeholders). This is also recognised in QAA's ESD guidance.

We recommend an additional practice is included: "Partnership arrangements between providers and their partners articulate expectations that relate to EDI and sustainability practices, maximising opportunities to positively impact these areas through their partnership where possible."

Principle 9

Changes made from the November 2023 draft:

- Principle amended for accuracy with regard to the purpose of recruitment, selection and admissions processes, and for clarity and simplicity.
- Practice a amended to acknowledge additional processes are required to accommodate the recognition of prior learning.

- Practice e amended to reflect the importance of informed choice.

April 2024 consultation draft:

> **Principle 9 - Recruiting, selecting and admitting students**
>
> Providers operate recruitment, selection and admissions processes that are transparent, fair and inclusive. Providers maintain and publish accurate, relevant and accessible information about their provision, enabling students to make informed choices about their studies and future aspirations.

Key Practices

a Policies and procedures for application, recruitment, selection and admission to programmes are reliable, fair, transparent and accessible, including processes for the recognition of prior learning.

b Information provided to prospective students and their advisors for recruitment and widening access purposes supports them in making informed decisions.

c Providers meet their regulatory obligations in relation to the information presented about themselves and their programmes of study.

d Staff, student representatives and external partners engaged in the delivery of recruitment, selection, admissions and widening access processes are appropriately trained and resourced.

e All teams involved in the application, selection and admissions processes ensure information about the applicant journey is consistent and clear. Specific elements of the selection process are clearly defined and any programme changes that can impact decision making are communicated swiftly and consistently to enable all parties to exercise informed choice.

Question 22 - Does Principle 9 make it clear what is expected of a provider?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)

Question 23 - Do the Key Practices under Principle 9 make it clear how a provider can demonstrate alignment to the Principle?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)
Based on the same rationale presented in our response to Questions 2 and 11, we recommend an additional practice under this principle to state that "Recruitment, selection and admission practises are delivered in line with providers' policies and practices on equity, equality, diversity, inclusion and sustainability."

Principle 10

Changes made from the November 2023 draft:

- Principle amended for simplicity and to emphasise a high-quality student learning experience in addition to student achievement and progression.

- Practice a amended for clarity.

- Practice b reworked for simplicity and clarity, and to acknowledge the recognition of different pathways into learning.

- Practice d amended to reflect the potential for specific needs and requirements of students.

- Practice e amended to clarify terminology around activities outside the formal curriculum.

April 2024 consultation draft:

> ### Principle 10 - Supporting students to achieve their potential
>
> Providers facilitate a framework of support for students that enables them to have a high-quality learning experience and achieve their potential as they progress in their studies. The support structure scaffolds the academic, personal and professional learning journey, enabling students to recognise and articulate their progress and achievements.
>
> **Key Practices**
>
> a   Accessible, relevant, accurate and timely information is offered to students and other key stakeholders throughout the learning journey about the provider, programme of study, wider opportunities for development and availability of support services.
>
> b   Students are supported at key transition points throughout their journey, with their specific needs and requirements met, and their particular pathways into learning recognised.
>
> c   Students, staff and those supporting student progression are aware of the ongoing academic, professional and pastoral services and activities available, and students are encouraged to access these opportunities and the support throughout their learning journey.
>
> d   Staff are appropriately qualified, trained and supported to deliver high-quality learning and support for all students, including those with specific needs and requirements.
>
> e   Activities offered outside the formal curriculum are recognised as beneficial for promoting students' sense of belonging, as well as providing opportunities for students to broaden their skills and achievements, complementing their formal studies.

Question 24 - Does Principle 10 make it clear what is expected of a provider?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)

Question 25 - Do the Key Practices under Principle 10 make it clear how a provider can demonstrate alignment to the Principle?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)
Supporting learners to achieve their potential is exactly what ESD is about – not just whilst they're studying but in their broader lives, jobs and futures too. This isn't about 'imposing' sustainability upon learners nor simply about them gaining knowledge about sustainability. Effective ESD practice supports learners to develop future orientated attributes. The QAA ESD guidance draws upon UNESCO's key competencies for sustainability

(https://unesdoc.unesco.org/ark:/48223/pf0000261802). Many education providers have explicit reference to ESD competencies and capabilities as part of their stated desirable graduate outcomes.

Employers are increasingly needing sustainability skills and attributes amongst their workforce, with many sectors citing sustainability skill gaps (https://www.aldersgategroup.org.uk/key-policy-areas/?category%5B0%5D=education-and-skills).One of the three themes of recommendations from the Government convened Green Jobs Taskforce was that investment was needed in "Building pathways into good green careers", one mechanism for which was supporting learners' progression pathways through relevant information, advice and guidance (https://www.gov.uk/government/publications/green-jobs-taskforce-report).

Quality has to ensure relevance. If we're not equipping learners for their lives and futures, we can't possibly be supporting them to achieve their potential. This requires education providers to build ESD into their policies and practices, and educators to be equipped with the skills they need to support their learners' ESD competencies.

Additionally, the increased accessibility of AI warrants a shift across all education sectors towards more competency-based, rather than knowledge-based, learning and assessment approaches. ESD centres precisely around these approaches and has decades of experience in trying, testing, and refining these. An increased focus on ESD across the education sector therefore represents a vital opportunity to ensure education remains meaningful alongside ever-increasing use and possibilities of AI.

We therefore recommend an additional practice: "Students are provided with opportunities to develop futures-oriented skills and competencies through both their formal and informal curriculum". Framing as futures-oriented will also allow providers to develop their EDI, AI, decolonisation etc. practices, in itself futureproofing the Quality Code.

Principle 11

Changes made from the [November 2023 draft](#):

- Principle title simplified to better reflect its purpose.

- Principle changed for greater clarity. Further amendments clarify the value of academic integrity in teaching, learning and assessment.

- Practice c amended to specifically mention staff.

- Practice d amended to reflect the importance of ongoing advice around academic integrity.

- Practice e reworked to recognise support requirements are needed for effective transition between academic levels.

- Practice f added to recognise the importance of fair, reliable, accessible and inclusive assessment. In addition, we have also highlighted different options for assessment being made available where it is possible and sustainable to do so.

- Practice g added to emphasise the importance of working in partnership with students to establish coherent approaches to emerging technologies that impact teaching, learning and assessment, with Generative Artificial Intelligence (Gen AI) provided as an example. This was added in response to requests for more emphasis on Gen AI

- Practice h added to acknowledge the specific requirements of research degrees and the importance of research informing teaching, learning and assessment. During the previous phase of consultation, concerns were raised about a perceived lack of emphasis on research degree provision in terms of a specific Principle. We are committed to providing discrete advice for the sector in this area and will consult in the future on the shape this advice will take, but we can confirm the Quality Code covers both taught and research degrees.

April 2024 consultation draft:

> **Principle 11 - Teaching, learning and assessment**
>
> Providers facilitate a collaborative approach to shaping a learning experience that enables students to have a high-quality experience and progress through their studies. All students are supported to develop and demonstrate academic and professional skills and competencies. Assessment employs a variety of methods, embodying the values of academic integrity, producing outcomes that are comparable across the UK and recognised globally.

Key Practices

a   Learning and assessment align to ensure students can demonstrate their potential and reflect on and reinforce their prior learning, skills and knowledge.

b   Students are clear about the intended modular and programme learning outcomes and the purpose of assessment, and they are enabled to use feedback/feedforward to support further learning.

c   Staff involved in facilitating learning and supervising research are appropriately qualified, supported and trained to deliver a high-quality learning experience, as well as being actively enabled to enhance their teaching and supervisory practice.

d	Students are enabled and encouraged to take responsibility for their own learning and to take an active role in shaping and enhancing the learning process. Providers offer ongoing advice and guidance about academic integrity to ensure that students and staff understand what is expected of them.
e	As students move through their learning journey they are given the opportunity and support to transition effectively between academic levels, recognising the progression they have made and steps they need to take to achieve their potential.
f	Providers design assessments that are appropriate, fair, reliable, accessible and inclusive. Where possible, and sustainable, students are offered different options for undertaking assessments to promote accessibility and inclusion.
g	Providers work in partnership with staff and students to establish coherent approaches to technology in teaching, learning and assessment (such as Generative Artificial Intelligence).
h	Research degrees are delivered in supportive environments that are conducive to learning and research with effective supervision arrangements. Learning and teaching at all levels is informed by research and/or scholarship.

Question 26 - Does Principle 11 make it clear what is expected of a provider?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)

Question 27 - Do the Key Practices under Principle 11 make it clear how a provider can demonstrate alignment to the Principle?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)

There is an extensive and growing body of academic research into ESD practices. These include experiential learning, interdisciplinarity and transformational pedagogies. Similarly authentic assessment mechanisms are being developed – which help demonstrate how learners can meaningfully apply their learning and the competencies they've developed. Currently many education providers have organisational policies and processes which act as barriers to the promotion of these practices and pedagogies.

Sustainability content is also increasingly explicit within qualification specifications, occupational standards and accreditation frameworks (e.g. https://www.instituteforapprenticeships.org/developing-new-apprenticeships/resources/sustainability-framework/). There is appetite from Professional, Statutory and Regulatory Bodies (PSRBs) to progress the inclusion of such content, and relevant competencies (forthcoming publication from St George's House following a consultation with numerous PSRBs, https://www.stgeorgeshouse.org/past_consultations/students-organising-for-sustainability/).

Therefore, we recommend an additional clause in practice f: "Providers design assessments that are appropriate, fair, reliable, accessible and inclusive. Where possible, and sustainable, students are offered different options for undertaking assessments to promote accessibility and inclusion and to ensure competencies and application of learning is assessed alongside knowledge."

We also recommend an additional practice: "Providers have in place structures which enable use of experiential learning, interdisciplinarity and transformational pedagogies."

Principle 12

Changes made from the November 2023 draft:

- Principle title changed to better reflect its purpose.

- Principle amended to reflect that the quality considerations in concerns, complaints and appeals centre on their operation, and it is the provider's responsibility to articulate processes to staff and students.

- Practice b amended to reflect the importance of clarity around the processes as well as the information about them.

- Practice c amended to highlight the need to meet international requirements where applicable.

April 2024 consultation draft:

> **Principle 12 - Operating concerns, complaints and appeals processes**
>
> Providers operate processes for complaints and appeals that are robust, fair, transparent and accessible, and clearly articulated to staff and students. Policies and processes for concerns, complaints and appeals are regularly reviewed and the outcomes are used to support the enhancement of provision and the student experience.
>
> **Key Practices**
>
> a   Policies and processes for concerns, complaints and appeals are accessible, robust and inclusive, and enable early resolution wherever possible and include information relating to recruitment, selection and admission.
>
> b   Concerns, complaints, appeals policies and procedures, including information about them, are clear and transparent to students, those advising them and those implementing the processes. Formal and informal stages of the processes are clearly articulated.
>
> c   Providers meet the national and (where applicable) international requirements of external bodies with responsibility for hearing or overseeing concerns and complaints.
>
> d   Actions resulting from concerns, complaints and appeals are proportionate and enable cases to be resolved as early as possible.
>
> e   Processes for concerns, complaints and appeals are monitored and reviewed to ensure they promote enhancement throughout the provider and operate as intended, to the benefit of students and staff.
>
> f   Outcomes from concerns, complaints and appeals are used to develop and enhance teaching and learning and the wider student experience.

Question 28 - Does Principle 12 make it clear what is expected of a provider?

Multiple choice (required)

- Yes

- No

Please give a reason for your answer (optional)

Question 29 - Do the Key Practices under Principle 12 make it clear how a provider can demonstrate alignment to the Principle?

Multiple choice (required)

- Yes
- No

Please give a reason for your answer (optional)

Section 5: The Glossary and Further Comments

We have amended the glossary in response to feedback received, including from colleges who will be using the Quality Code as part of the tertiary frameworks in Scotland or Wales, or when operating in partnership with degree-awarding bodies. It is recognised that those colleagues may use different terminology currently.

The terms which have been amended or are new to the glossary since the November 2023 draft are shown below - for the full glossary, see the consultation draft.

April 2024 consultation draft:

Academic integrity - a commitment to the fundamental values of honesty, trust, fairness, respect and responsibility. The opposite of academic integrity is unethical practices such as plagiarism, collusion, contract cheating or academic misconduct.

Enhancement - the deliberate and systematic improvement in the quality of provision and the ways in which students' learning is supported, involving the active engagement of students and staff. Enhancement has different interpretations across the UK with some UK nations having an 'enhancement-led' regulatory framework.

Equality - each individual or group of people is given the same resources or opportunities, but QAA considers that equality should include the concept of 'equity,' which recognises that each person has different needs and therefore resources and opportunities should be allocated to reach an equal outcome.

Quality - refers to how well providers support students to consistently achieve positive outcomes in learning, personal development and career advancement, while meeting the reasonable expectations of those students, employers, government and society in general.

Standards/academic standards - these are the standards that degree-awarding bodies set and maintain for the award of academic credit or qualifications. Degree-awarding bodies are responsible for defining their own academic standards by setting the pass marks and determining the grading/marking schemes and any criteria for classification of qualifications that differentiate between levels of student achievement above and below the threshold academic standards. These individual standards align to national qualifications and credit frameworks and/or The Framework of Qualifications for the European Higher Education Area.

Tertiary education - all post-secondary education encompassing further and higher education including academic, vocational and professional qualifications. How the term is interpreted varies between the UK nations - providers are advised to check their funder/regulator's websites or the relevant external review guidance for further information. When working with overseas partners, providers should also check the definition as understood by their partner as the meaning of 'tertiary' may vary in different countries.

Question 30: Is the glossary useful in helping you to understand key terms used in the Quality Code?

Multiple choice (required)

- Yes

- No

Please give a reason for your answer (optional) Education for sustainable development,

29

Learning for Sustainability (a term used in place of ESD in some tertiary education providers, particularly in Scotland) and other relevant terms as outlined on pages 5 and 6 of the QAA/Advance HE ESD Guidance should also be included.

Further comments

Question 31 - Do you have any further comments to make about the proposed 2024 edition of the Quality Code?

Free text (optional)

The tertiary education sector has a critical role to play in the achievement of sustainability goals in the UK and internationally - both in terms of access to, and provision of, quality education, but also in terms of education being an enabler to achieve broader environmental, social and economic goals. Given the urgency of both the climate and biodiversity crises and the need to tackle systemic inequalities and foster inclusivity, we cannot delay action.

Education providers (and other stakeholders) cite inconsistencies across the sector landscape as one of the barriers to progress. QAA has taken a leadership role driving sustainability and ESD uptake, particularly with the publication of ESD guidance, funding of collaborative projects and the embedding of sustainability into subject benchmark statements. However, unless sustainability is embedded and promoted through the core systems and frameworks that shape how the tertiary education system operates, it will always be seen as 'additional' rather than 'integral'. This goes against the universality of ESD, and the sentiment of the QAA's own ESD guidance. The Quality Code is one such core framework.

Integration of ESD explicitly within the Quality Code would help the sector avoid unnecessary duplication. Providers and their stakeholders wouldn't have to individually 'do the detective work' to find the intersections between ESD and academic standards and quality. Where other sector organisations have missed opportunities to explicitly promote sustainability in their frameworks and standards, they have come under criticism for tokenism and missed opportunities.

Rather than superficially map the existing ESD guidance to the new revision of the Quality Code and its principles, ESD, similarly to EDI, should be consistently integrated and referenced throughout the Quality Code's principles and key practices, forming an essential and explicit part of tertiary education providers' academic standards and quality. We have provided extensive suggestions in our consultation response as to how this could be achieved. This should be, in addition to the provision of more specialist technical guidance for those leading on developing ESD in teaching, learning and assessment practices.

We know QAA plans to coordinate the publication of guidance and advice to accompany the quality code over the next three years. Given the pressing timelines of the sustainability agenda, and particularly underlying environmental issues, we propose approaches that drive the integration of sustainability into tertiary education should be prioritised in these timelines. Similarly, given that sustainability and ESD are increasingly explicitly referenced in key sector publications (e.g. the Department for Education's sustainability and climate change strategy, subject benchmark standards, initial teacher education specifications and professional standards in the FE and training sector), practitioners are looking for guidance around sustainability and ESD now, particularly as there is a gap between educators recognising the importance of, and need for ESD and their capabilities and confidence to deliver ESD (e.g. https://www.et-foundation.co.uk/resources/esd/esd-research/experiences-of-esd-in-the-fe-and-training-sector/ and https://drive.google.com/file/d/1DYNmcsQ5cM9iKdcjNL4riRGaK75Za2Ac/view). Therefore, sustainability and ESD should be an integral part of all phases of guidance production

around the quality code.

EAUC is very keen to support and work with QAA in this field. We offer to identify and share examples of effective ESD practice from across the tertiary education sector, help identify relevant experts for the panels creating future advice and guidance documents, and participate in future consultation exercises.