



## Future arrangements for assessing quality and standards

### Purpose

1. This paper provides an update on the implications of the announcement by the Quality Assurance Agency (QAA) that it no longer consents to be the designated quality body (DQB) from 31 March 2023. It sets out how the OfS is managing the statutory functions to assess quality and standards during the following phases of work:
  - a. Transition out of the QAA as the DQB from now until 31 March 2023.
  - b. Developing the OfS's capacity and infrastructure to deliver assessments from 1 April 2023, at least for an interim period.
  - c. Planning for future longer-term options.

### Recommendations

2. The board is invited to note the developments since the last board meeting and our work in planning for future arrangements.

### Issue

3. The QAA announced on 20 July 2022 that it would no longer consent to be the designated quality body in England (DQB) after the current DQB year ends on 31 March 2023<sup>1</sup>. In its announcement the QAA said that its decision was because it took the view that the regulatory approach in England is not consistent with the expectations imposed through the QAA's registration on the European Quality Assurance Register for Higher Education (EQAR).
4. EQAR had temporarily suspended the QAA's registration because of areas of non-compliance relating to the publication of assessment reports and including students on all DQB assessment teams. While it is likely that these areas could have been addressed, [exempt from publication].
5. The EQAR registration system focuses on the activities of a particular body – in this case the QAA – rather than on the regulatory system in a country as a whole. This means that any activities carried out by the OfS, rather than the DQB, as part of our wider approach to regulation would not be taken into account in determining the QAA's EQAR status. For example, we take the view that the TEF represents a cyclical review process for providers in England, but this is carried out by the OfS rather than the DQB. Exempt from publication.

---

<sup>1</sup> <https://www.qaa.ac.uk/news-events/news/qaa-demits-dqb-status-to-focus-on-sector-and-students-in-england>

## **Plan for managing remaining work with the DQB**

### **DQB assessments**

6. The DQB currently undertakes the following activity for the OfS, all of which is funded by each individual provider subject to assessment:
  - a. Quality and standards review (QSRs) for providers seeking registration (available for providers that applied for registration before 1 May 2022).
  - b. Standards assessments for the purpose of assessing initial condition B8 for providers that applied for registration after 1 May 2022.
  - c. Assessments for degree awarding powers (DAPs).
7. The OfS is also responsible for External Quality Assurance (EQA) of end-point assessments for integrated higher and degree apprenticeships. The DQB delivers assessments on the OfS's behalf against the Institute for Apprenticeships and Technical Education's (IfATE) framework. The work is funded by the Education and Skills Funding Agency (ESFA) rather than through a charge to providers.
8. Since the QAA's announcement, we have been working with the QAA and DfE to agree a plan for the DQB's remaining assessment work between now and 31 March 2023. The QAA has committed to deliver a smooth transition and has agreed that it will continue to deliver as much assessment activity as it can complete before 31 March 2023 to ensure that those providers eligible to be assessed do not suffer disruption or delay. This is particularly important because, although HERA allows the OfS to undertake assessments of quality itself, we do not currently have powers that would allow us to charge for and fund this activity, and we are not able to assess standards while there is a DQB. In relation to DAPs, HERA requires us to request advice from the DQB before any order is made.
9. We have agreed that the DQB will finish all assessment activity that is currently in progress and have also agreed the number of new referrals for assessment work. All existing and any new assessment activity is scheduled to be completed ahead of 31 March 2023. We have agreed to some streamlining of current approaches that will reduce the likelihood of the DQB being unable to complete its work. For some assessment activity we have also agreed that the DQB will complete particular stages of assessment rather than a full assessment so that it can be handed over cleanly to the OfS to complete subsequent stages. We have also been clear to providers that if they cannot meet the timescales set out for an assessment by the DQB, the DQB will not be able to complete its assessment and the assessment would be handed over to the OfS. In these circumstances it is unlikely that any actual assessment activity would have taken place. We are therefore reassured by the DQB that it will be able to finish all agreed assessment activity by 31 March 2023.

### **Developing the OfS's capacity to deliver assessments**

10. We set out below our emerging thinking about longer-term arrangements but whatever position we reach on that, it is clear that the OfS will need to pick up all assessment activity from 1 April 2023 because there is insufficient time for any alternative solution to be put in place.

11. We are therefore developing the capacity and infrastructure to deliver quality and standards assessments in-house. We know that the DQB is unable to deliver all the assessment activity we would normally expect from it over the next few months because of the time it takes to complete assessments – as set out above, we are seeking to avoid a situation in which there are incomplete assessments at 31 March 2023. We are therefore planning to take on any assessment that the DQB is unable to deliver during this period and would expect to carry out some of these before 31 March 2023, subject to agreeing with DfE funding arrangements. We then intend to carry out all required assessments in-house from 1 April 2023. This will enable continuity of service to providers and a cleaner transition and handover from the DQB.
12. We plan to deliver this assessment function by extending the model we have established to undertake current quality investigations. For quality investigations we have recruited a pool of expert academic assessors. Scaling up this model will include recruiting more assessors with a broader range of academic expertise, for example with a range of subject expertise, from a diverse range of providers, and to include student assessors. We envisage establishing a single expanded pool of assessors that could be drawn on to deliver different types of quality and standards assessments and to undertake assessments for DAPs.
13. We are also considering how our internal operational capacity will need to increase to support these additional activities.
14. We expect to continue these in-house arrangements for as long as necessary. The internal function will be established so that the OfS could continue to operate without a designated body over the longer-term or could hand over this function, along with the assessment approaches we develop, if a new DQB is established in the future.
15. This represents a substantial programme of work for the OfS and we are therefore identifying the necessary resources to deliver this work effectively - see the resource section below for further detail.

## Considering longer-term future arrangements

16. In parallel to establishing capacity to deliver the assessment functions in-house from 1 April 2023 we are discussing with DfE and Universities UK whether a suitable body could be established in future as a new DQB. We are open to working with a new DQB in principle, but have been clear that we would not wish to do so in practice unless [exempt from publication] (b) this would represent a more efficient and effective solution than an in-house model.
17. We have identified a set of principles to underpin our consideration of the credibility of future arrangements involving a new DQB. These would be relevant to any assessment we make of a body's suitability for designation:
  - a. Sophisticated understanding of the OfS's role as the statutory regulator of quality, the relevant regulatory requirements in England, and the OfS's principles-based and outcomes-focused regulation for a diverse sector.
  - b. Ability and willingness to challenge the status quo and sector norms where appropriate.

- c. Able to produce accurate, reliable and evidence-based judgements and convey these in writing in a form the OfS can use to defend its decisions as necessary.
- d. Independent from providers, and without actual or perceived conflicts of interest.
- e. Governance arrangements that provide effective oversight of the delivery of its functions.
- f. Agile and flexible in response to changing OfS requirements, and to wider changes in the policy, regulatory or higher education context.
- g. Self-reflective and proactive in acting upon feedback, with an ability to evolve its thinking and approaches.
- h. Value for money for providers, maximising efficiencies and economies of scale.

### **[Exempt from publication]**

18. Exempt from publication.

19. Exempt from publication.

### **[Exempt from publication]**

20. Exempt from publication.

### **[Exempt from publication]**

21. Exempt from publication.

## **Communications**

22. A detailed communications plan has been developed which includes:

- We are writing directly to individual providers expecting to be referred to the DQB for assessment to advise them on transition arrangements and, where appropriate, to provide options on how we will progress their application.
- We have prepared reactive lines in anticipation of queries from providers or the media.
- We plan to engage with sector mission groups and other key stakeholders through usual 1-2-1 meetings during the autumn.
- We are planning a public statement that will explain the arrangements we are putting in place for transition and set out the options for the longer-term.

## **Paper publication date**

23. This paper can be published after the October 2022 accountable officer mailing because we expect to provide further information on transition from the DQB on that date. We may still need to make some redactions before publication because it is policy in development.

## Further information

24. Jean Arnold, Director of Quality, [jean.arnold@officeforstudents.org.uk](mailto:jean.arnold@officeforstudents.org.uk), 30 September 2022.