

Introduction

1. QAA Scotland is pleased to respond to the Consultation Paper on the proposed merger of SHEFC and SFEFC and the associated draft Bill. Our response is confined to commenting on matters directly related to the responsibilities and competence of QAA Scotland.
2. Before commenting on matters of substance, we wish to place on record our welcoming of the transparent and open manner in which the consultation process has been designed and implemented. In particular, we greatly welcomed the opportunity for open debate provided by:
 - the discussions between QAA Scotland (and others) and the Scottish Executive prior to publication of the Consultation Document;
 - the public meetings held throughout Scotland during the consultation period;
 - the further meetings between QAA Scotland (and others) and the Scottish Executive during the consultation period; and,
 - the innovation of the Consultation Paper providing 'platforms' for key bodies to present position statements.

General view

3. In general, QAA Scotland welcomes the proposed merger. The past two years have seen the development and implementation in Scotland of a new framework for assuring and enhancing quality in higher education. The focus of this activity is clearly and explicitly on the nature of the student experience. By bringing together the two funding councils the opportunities for a strategic approach that is learner centred are greatly strengthened. In this regard, we support the statements in the NUS platform in relation to the importance of the relationship for many learners between FECs and HEIs and the linked importance of the Lifelong Learning agenda in Scotland.
4. We do, however, recognise the importance of supporting the diversity of institutions in the tertiary sectors and strongly support the statement in the Consultation Document (paragraph 45) that, *'FECs and HEIs are autonomous institutions with distinctive characteristics and missions and ... that this diversity is essential for the continued success of Scotland's society and economy'*. Within this diversity we nevertheless are of the view that it is useful to maintain the distinct identity of institutions whose prime function is related to higher education, ie teaching, scholarship and research related directly to the creation of knowledge. Within the unified Council, we are therefore of the view that it is useful to retain the distinction between higher and further education institutions. We are also of the view that it is important to retain a process for designation as an HEI broadly in line with the current arrangements (paragraph 100).

some feedback
input into statement

Quality Assurance and Enhancement

5. We confirm our support for the approach taken to quality assurance and enhancement in the Consultation Document. The central role of institutional ownership and self-evaluation (paragraph 84) together with independent review (paragraph 74) represent two key pillars of the desired approach. To this we would add the fundamental importance of independent review taking the form of peer review. In our view, this is a fundamental ingredient of both the credible assurance and effective enhancement of quality and standards.
6. QAA Scotland also strongly welcomes the addition of quality enhancement to quality assurance (section 15 Annex H and Draft Bill 15(i)(b)). We are of the view that the enhancement-led approach to the assurance of quality and standards will reap significant rewards for learners and other stakeholders in both FECs and HEIs. The new enhancement-led framework in higher education has been built on the secure foundations of internal quality management systems developed and tested through previous approaches.

7. One of the core advantages of bringing together the funding councils is that a prime focus will be on the student experience and the student journey as she/he moves, potentially, between different providers of post-compulsory provision. One of the key outcomes of the Mapping, Tracking and Bridging project (paragraph 103 of the Consultation Document refers), is that we need to be more systematic in our tracking of students and enhancing the quality of their bridging experience as they move between different providers in the post-compulsory sectors in Scotland. It is vital that such arrangements are systematically brought within the arrangements for assuring and enhancing provision in Scotland. In a similar vein, it is not clear under the present arrangements that special arrangements for access to higher education are included, as a matter of course, within the current assurance and enhancement arrangements.

Designation of new providers

9. International evidence would suggest that great care needs to be taken in this area. We support strongly the statements in the Consultation Document (annex A) regarding the criteria for designation as provider. In particular we would wish to emphasise the requirements to demonstrate *'that they have robust processes in place for ensuring continuous quality assurance and enhancement of activities funded by the new body'*. We also commend the retention of the current processes for designation as an HEI (see above, paragraph 4).

The Scottish Credit and Qualifications Framework

10. We would wish to support the statement in the COSLA platform (paragraph 148) that, *'the use of the SCQF, even though it is still in its infancy, can prove to be an effective tool in making the qualifications structure, and through this the link between institutions, simpler and more customer focused'*.
11. In our view, the SCQF is a key and fundamental element in the toolkit and vocabulary of students, aspirant lifelong learners, and the strategic planners in the merged funding council.

Collaborative Working

12. Paragraphs 86 – 92 of the Consultation Document stress the importance of collaboration between providers. This we fully endorse.
13. However, it is an important in our view that there is full collaborative working between other stakeholders. In particular, we are conscious of the critical importance of the Quality Working Group (QWG) in the HE sector involving close co-operation between QAA Scotland, Universities Scotland, SHEFC and NUS (S).

Consultation

14. Section 18 of the Draft Act identifies persons whom the proposed Council should consult in the exercise of its functions. Given the important role of QAA Scotland, we are of the view that QAA Scotland (or any successor body) should be added to the list at 18(3).

Further information

15. We trust that these comments will be of value to the Scottish Executive as it takes these interesting and important proposals forward. We would be pleased to discuss further any matter which would be helpful to the Executive in this exercise.