

Consultation on a simplified External Quality Assurance system

This response is on behalf of the Middlesex University. Middlesex University is a major employer, with over 1,800 staff on our London campus. We have over 19,000 students at our North London campus in Hendon and a further 21,000 studying at our overseas campuses in Dubai and Mauritius or for Middlesex awards around the world and are therefore a global operator playing a major role in the London skills ecosystem.

Question 1a: Does the proposed system impact your organisation?

Yes, the proposed system will impact our organisation.

Question 1b: If yes, please exemplify any benefits or challenges you foresee in the proposal for your organisation.

- Benefits

We welcome the proposed change to simplify the EQA system and agree that having one body to oversee higher education end-point assessments (OfS) and one body for other end-point assessments (Ofqual) is logical. This is a significant clarification and improvement on the existing arrangements, where 20 organisations are approved to deliver EQA.

Similarly, for integrated degree apprenticeships, the confirmation that EQA will be the responsibility of OfS appropriately aligns quality responsibilities and reduces unnecessary burden and duplication for employers.

- Challenges

As an employer that uses non-integrated degree apprenticeships to train our staff, as well as a provider of them, we would also advise that OfS oversee non-integrated degree apprenticeships. This is due to the mandatory degree qualification within them, which forms a component of the end-point assessment. Given the higher education sector specific nature of this type of apprenticeship, it does not seem at all appropriate that Ofqual oversees them rather than recognising the higher education expertise and regulatory role of OfS.

This should also apply to non-integrated higher apprenticeships delivered by accredited higher education providers (such as the Nursing Associate apprenticeship) and to all specialist higher education apprenticeships. There would seem to be great merit in aligning quality responsibilities so that OfS had EQA responsibility, to bring to bear its higher education expertise and regulatory role rather than Ofqual, which has no such role.

Our proposal will also avoid duplication of the quality assurance burden on Higher Education employers, in line with the objective to simplify the system.

Question 1c: How do you propose the Institute should manage the impact of the proposal on your organisation?

Middlesex University would propose that the impact would be most effectively managed if OfS had responsibility for: all integrated and non-integrated degree apprenticeships; all non-integrated

higher apprenticeships (such as Nursing Associate) where regulated by a professional body; all specialist higher education sector apprenticeships, such as the Academic Professional.

Question 1d: If no, please tell us more about your interest in EQA, exemplify any benefits or challenges you foresee in the proposal and your proposals to manage these impacts.

N/A

Question 1e: Do you have any comments about the potential impact the proposals outlined in this consultation may have on individuals with a protected characteristic under the Equality Act 2010? Please explain your reasoning.

As a provider, we develop access and participation plans for the OfS, as part of their regulatory framework and regularly report to OfS on individuals with a protected characteristic. Additional reporting to Ofqual would add an additional costly layer of administrative burden to institutions with no clear benefit for apprentices at a time when higher education institutions are working hard on securing their financial sustainability.

Question 2a: Do you agree with the list of organisation types that could be included in the Institute's register of professional and employer-led bodies?

Yes

Question 2b: Do you agree with the Institute's proposed criteria for accessing the register of professional/employer-led organisations?

Yes

Question 2c: Does this approach effectively and sufficiently utilise the expertise of professional bodies to assure professional competence?

Yes

Question 2d: Do you have any suggestions for how this approach could be improved?

Arrangements, events and activities for sharing of best practice could be supported to ensure that a culture of ongoing enhancement is at the heart of EPA and EQA practice.

Question 3a: Are there aspects of the transition arrangements that could be improved?

Yes

Question 3b: If yes, please provide more detail

Middlesex University would propose that the impact would be most effectively managed if OfS had responsibility for: all integrated and non-integrated degree apprenticeships; all non-integrated higher apprenticeships (such as Nursing Associate) where regulated by a professional body; all specialist higher education sector apprenticeships, such as the Academic Professional.

If this was accepted for the reasons indicated above, the transitional process could be improved by facilitating the alignment of EPAOs to OfS within a shorter timeframe where EPAOs have a willingness to do so and have demonstrated that their EPA practice is robust.

Question 3c: [For EPAOs] Do you envisage applying for Ofqual recognition?

Many Higher Education employers are also EPAOs, both for integrated degree apprenticeships and for non-integrated apprenticeships (such as Nursing Associate). We believe that it would make sense for Higher Education employers to be recognised by one EQA body rather than two. As such, a requirement to also register with Ofqual could present a barrier to Higher Education employers operating as EPAOs, as an administrative burden and an additional cost.

Question 3d: [For EPAOs] What support do you envisage needing in the transition period, and beyond?

Where the above proposals are implemented (i.e. further simplifying EQA arrangements), then minimal support would be required as established relationships exist between Higher Education employers and OfS. Were this not the case, Higher Education employers who were also EPAOs would require significant support to meet the requirements of an additional quality body.

Question 3e: Do you think there are any further opportunities to simplify or optimise the system that have not been covered in previous questions? If so, what?

The proposals for further simplifications have been outlined in the responses to the questions above.