



If the QAA's designation is removed as requested, the Office for Students (OfS) has

the wording, 'on the basis set out above'. The consultation states that from 1 April 2023, the OfS 'will undertake all quality and standards assessments on an interim basis'.

We believe that a DQB, that works with but is independent of the OfS, remains the most appropriate model. It ensures the legitimacy of an investigating authority to conduct its activity and inform impartial and evidence-based judgements. It also supports the continual development of investigative expertise and skills, with greater space for academic input, and provides greater clarity of roles between assessors and OfS staff, ensuring freedom to express evidence-based opinions.

We are therefore calling on both the OfS and DfE to commit to and publish a clear timetable for when and how a review of the interim arrangements will take place. Whatever the outcome, interim arrangements should not be made permanent by default without an assessment of performance. Such an assessment must involve consideration of value for money, effectiveness, and the potential for future efficiencies. It should also be informed by sector feedback, and we are calling on the OfS to confirm plans for how it will consult with the wider sector on the establishment of longer-term arrangements.

We also want to emphasise that our agreement to the proposed de-designation is given on the condition that during both interim period and future arrangements, the OfS is held accountable on its ability to:

- Protect student choice and enable universities to tailor teaching, learning and assessment to best meet the needs of students and communities.
- Protect the credibility of higher education qualifications in the UK and internationally and ensure the UK maintains its world leading status as a trusted destination and partner in the delivery of higher education.
- Ensure the public funds and students fees directed into providers' OfS and/or

- Provide leadership and expert independent advice, to create opportunities for innovation within the regulatory framework and support better regulation.

Finally, in progressing with the de-designation, the OfS and DfE will need to reflect on the position of the QAA. In their decision to demit DQB status, the QAA reflected on concerns that the regulatory approach to quality and standa sGS0 gs21. 3.1 (e)5.1 (gu)1 (l)2 da sG0 0 mip