



Office for Students - Consultation on quality and standards conditions

Consultation response – September 2021

The Council of Deans of Health welcomes the opportunity to contribute to this consultation. The Council represents 100 UK university faculties engaged in education and research for nursing, midwifery and the allied health professions.

Key messages

1. Regulation should be outcome-focused, risk-based, data-driven and agile. Healthcare higher education is regulated by both professional healthcare regulators and higher education regulators.¹ The sector is in danger of burdensome and duplicative regulation from both healthcare professional and higher education regulators. Too often education regulation impinges unnecessarily on healthcare professional regulation. There is a need to reduce the regulatory burden placed on education providers considering the robust regulation provided by healthcare professional regulators. Removing this overlap would save costs by reducing inherent inefficiencies but also clarify overarching policy responsibilities and allow individual regulators to focus and specialise on their remits.
2. Proposed condition B1.3a introduces a new requirement that 'each higher education course is up-to-date'.² The Office for Students (OfS) needs to provide more clarity on what 'up-to-date' means. Universities delivering healthcare education continually update their programmes in partnership with health and social care providers in line with the latest evidence and teaching methodologies. For example, the move to blended learning and augmented reality simulated placements and focus on ICU nursing skills and therapeutic interventions to support patients with long Covid considering the lessons of the pandemic.

Healthcare professional regulators set standards of proficiency which can last for up to a decade. For example, the Nursing and Midwifery Council's (NMC) previous nurse education standards were set in 2010³ and updated in 2018.⁴ The OfS must consider that HEIs delivering healthcare education will be delivering education in accordance with standards set several years ago but are

¹ Department of Health, 2018, [Promoting professionalism, reforming regulation: A paper for consultation](#), p30

² Office for Students, 2021, [Consultation on quality and standards conditions](#), p42

³ Nursing and Midwifery Council, 2010, [Standards for pre-registration nursing education](#)

⁴ Ibid., 2018, [Future nurse: Standards of proficiency for registered nurses](#)

still current and valid. Healthcare professional regulators would not permit HEIs to provide programmes that were not up-to-date with current evidence and teaching methodologies. These regulators are best placed to determine if a programme is a risk to the public rather than the OfS due to their professional expertise.

3. Condition B4 sets standards in relation to assessment and awards and condition B5 sets standards in relation to sector-recognised standards. Condition B5.2 specifically requires that university awards are 'consistent with any applicable sector-recognised standards' and 'awards are only granted to students whose knowledge and skills are consistent with any applicable sector-recognised standards'.⁵ However, this is already assured by the existing external examiner system that benchmarks outcomes and standards across institutions. In relation to this new requirement the OfS must also have regard to the role of healthcare professional regulators, such as the NMC and the Health and Care Professions Council (HCPC) who set threshold standards and also have a role in determining consistency and outcomes. Their standards must take precedence over other regulatory bodies, as they control entry to professional registers for the benefit of public protection.
4. The OfS plans to set qualification descriptors for degree classifications at different levels⁶. The OfS should set high level regulatory principles rather than detailed guidance of this sort. This poses questions regarding the longstanding principle of institutional autonomy in UK higher education, which must be upheld.

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⁵ Office for Students, 2021, [Consultation on quality and standards conditions](#), p68

⁶ Ibid, p82