

# **Inclusion of higher technical qualifications in the Office for Students' student outcome measures: Summary of consultation responses**

**A report by Pye Tait Consulting for the  
Office for Students**

Final report

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## Executive summary

This report presents a summary of the responses gathered through the Office for Students' consultation on the inclusion of higher technical qualifications in OfS student outcome measures.

### Background

Higher technical qualifications (HTQs) are new or existing Level 4 and 5 qualifications, such as higher national certificates (HNCs), higher national diplomas (HNDs) and foundation degrees. They sit between A levels or T levels and degrees.

The Institute for Apprenticeships and Technical Education (IfATE) has been approving new HTQs since they were introduced in 2020, when the first cycle opened. Courses have been rolled out gradually in the first four cycles of the approval process. The government's ambition is to establish these courses as a distinct type of higher education, and it is expected that the number of students on courses that are approved HTQs will grow steadily.

The anticipated growth in student numbers means that the OfS wants to consider whether it is appropriate to identify these courses separately from other Level 4 and 5 courses in its approach to regulating student outcomes. In order to protect the interests of students and taxpayers, the OfS believes that it should be able to understand performance on HTQs separately from other courses.

The OfS therefore sought views on its proposals through a public consultation on the introduction of HTQs as a split indicator and inclusion of HTQs in OfS student outcome measures.<sup>1</sup>

The consultation was open from 27 July to 9 November 2023. In total, 37 unique, valid responses were received.

### Key findings

#### Views on introducing HTQs as a split indicator

Twenty-seven respondents (75 per cent) agreed that the OfS should introduce a split indicator that would result in it publishing information and regulating the outcomes for students studying on HTQs, while six respondents (17 per cent) did not agree, and three respondents (8 per cent) were unsure.

Additional comments were provided by 31 respondents, with the following themes emerging.

#### Assessing student outcomes

Nine respondents (29 per cent) discussed the usefulness of introducing a split indicator for HTQs in assessing student outcomes. Reasons given include that:

- more granular data would be valuable and more informative for student choice (seven, 23 per cent), and
- more detailed data would be useful for anyone interested in assessing providers or courses (two, 6 per cent).

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<sup>1</sup> Available at: <https://www.officeforstudents.org.uk/publications/consultation-on-the-inclusion-of-higher-technical-qualifications-in-office-for-students-student-outcome-measures/>.

### **Consideration of provider burden**

Thirteen respondents (42 per cent) highlighted a desire for there not to be any additional burden placed upon providers, specifically in relation to data analysis and reporting (eight, 26 per cent), and regulatory and administrative burden (eight, 26 per cent).

### **Associated data issues**

Seven respondents (23 per cent) discussed data issues with regard to HTQs being introduced as a split indicator. Of these, three respondents (10 per cent) argued that HTQ data is likely to be unrepresentative due to small student numbers both currently and potentially in the near future. They further added that the grouping together of students studying Level 4 and 5 HTQs within the data may result in an inaccurate representation.

### **Suggestion to reconsider timeline**

Nine respondents (29 per cent) suggested it would be beneficial for the OfS to wait to implement its proposals until there is greater student uptake in HTQs, adding that this is in order for more accurate and useful data to be generated. Once there a larger student cohort has built up (potentially in a few years, no specific timeframe was noted), the data will be robust and stable and they will be able to decide whether viewing data as a split indicator or establishing HTQs aside from other Level 4 and 5 courses would have greater regulatory value.

### **Review of certain measures**

Six respondents (19 per cent) felt that certain measures need to be reviewed following the greater uptake of the HTQs, with two (6 per cent) each suggesting reviews of:

- the progression measure, to allow for some courses currently categorised as 'unskilled' to be added, and for skilled manual roles to be included, so that this is applied for all providers and qualification levels, and
- minimum numerical thresholds, to ease the reporting burden for providers in relation to HTQ rollout. No specific numerical threshold was mentioned, but respondents discussed considering how the HTQ minimum thresholds relate to other model and level thresholds set out.

### **Preferred approach for regulating outcomes for students studying HTQs**

Of the ten respondents who provided comments when asked about a preferred approach for regulating outcomes for students studying HTQs, four (40 per cent) stated a preference for HTQs to be introduced as an indicator, as this would enable performance of different demographic groups studying HTQs to be analysed in more detail, and will offer a longer-term approach.

Two respondents (20 per cent) discussed a preference for the OfS to consider wider ongoing higher education policy and context, such as:

- changes to university foundation year funding to allow for the delivery of more Level 4 programmes, with the aim of widening participation. Resultant data would allow for comparison of HTQ outcomes with other undergraduate qualifications by level (one, 10 per cent), and
- declining staff retention rates that may impact the delivery of HTQs for disadvantaged students (one, 10 per cent).

# 1. Introduction

## 1.1 Background

### 1.1.1 Higher technical qualifications

Higher technical qualifications (HTQs) are new or existing Level 4 and 5 qualifications, such as higher national certificates (HNCs), higher national diplomas (HNDs) and foundation degrees. They sit between A levels or T levels and degrees and can be taught at a further education college, an independent training provider or a university. They are developed to meet employer occupational standards and approved by the Institute for Apprenticeships and Technical Education (IfATE).

IfATE has been approving new HTQs since 2020. Courses have been rolled out gradually in the first four cycles of the approval process. The first cycle opened in 2020 and covered occupational standards in digital, and students could start on approved courses from 2022. Courses related to occupational standards in health and science, and construction, followed in the second cycle. Further courses were approved in the third cycle, relating to standards including business and administration, and engineering.<sup>2</sup> The fourth cycle opened in 2023 with courses relating to occupational standards from sectors such as creative and design, care services, and protective services. IfATE is now approving courses across all occupational standards.

The government has set out its plans to improve higher technical education and how HTQs can help people train or retrain for high-skilled jobs.<sup>3</sup> IfATE and the Department for Education (DfE) expect to see a steady growth in the number of students on courses that are approved HTQs. The government aims to establish HTQs as a distinct type of higher education. It is giving students on these courses early access to the lifelong learning entitlement (LLE),<sup>4</sup> and believes that they have the potential to attract considerable interest.

This growth in student numbers means that the OfS wants to consider whether it is appropriate to identify these courses separately from other Level 4 and 5 courses in its approach to regulating student outcomes. The OfS believes that it should be able to understand performance on HTQs separately from other courses so it can protect the interests of students and taxpayers. This means it could take HTQ student outcomes into account in the way it regulates student outcomes.

### 1.1.2 Approval and support of HTQs

Currently, there are 172 approved HTQs. Over 70 providers were able to offer these courses in 2022-23, and this number is expected to double in 2023-24.

The DfE is focused on expanding high-quality Level 4 and 5 HTQ provision, allocating £16 million in funding for the 2023-24 financial year. It has asked the OfS to provide additional

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<sup>2</sup> <https://www.instituteforapprenticeships.org/qualifications/higher-technical-qualifications/introduction-to-higher-technical-qualifications-and-scope-of-approval/> – accessed 5 December 2023

<sup>3</sup> DfE, 2020, Reforming Higher Technical Education: Government consultation response

<sup>4</sup> <https://www.gov.uk/government/publications/lifelong-learning-entitlement-lle-overview/lifelong-learning-entitlement-overview> – accessed 5 December 2023

funding for these courses through the public grant funding that supports strategic priorities.<sup>5, 6</sup>

Meanwhile, the DfE has amended criteria for funding access for full- and part-time learners on IfATE-approved Level 4 and 5 HTQ courses, allowing any student on an approved HTQ to access student finance.

Alongside this, IfATE approves each HTQ, requiring evidence from the awarding body of meeting approval criteria, alignment with standards, employer endorsement, comprehensive knowledge, skills, and behaviours coverage, and fair assessment methods.<sup>7</sup>

### 1.1.3 HTQs in the OfS's current approach to regulating student outcomes

The OfS uses three key measures in its approach to regulating student outcomes:

1. **Continuation measure** reports the proportion of students continuing in the study of a higher education qualification (or that have gained a qualification) one year and 15 days after they started their course (two years and 15 days for part-time students).
2. **Completion measure** reports the proportion of students that have gained a higher education qualification (or were continuing in the study of a qualification) four years and 15 days after they started their course (six years and 15 days for part-time students).
3. **Progression measure** uses the Graduate Outcomes survey to report on qualifiers' labour market and other destinations 15 months after leaving higher education.

The OfS sets minimum numerical thresholds for each measure through its regulatory condition B3, for each mode and level of study.<sup>8</sup>

Split indicators are used to analyse performance by time series, subject, student characteristics, course type, and teaching arrangements.

Currently, all HTQs are included in the OfS 'other undergraduate' (OUG) level of study. Within the OUG level of study, the OfS currently uses split indicators to distinguish between courses that are Level 4, and Level 5 and above. However, it does not publish split indicators that distinguish between courses in other ways, for example to show that they are HTQs or leading to a foundation degree.

### 1.1.4 OfS proposal

The OfS is proposing to change its outcome measures to have HTQs as a split indicator separately from other Level 4 or 5 qualifications. This is because:

- a. The government is seeking to establish HTQs as a distinct type of higher education with common characteristics.

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<sup>5</sup> Guidance to the Office for Students on the Higher Education Strategic Priorities Grant for the 2023-24 Financial Year: <https://www.officeforstudents.org.uk/media/8098/ofs-spg-guidance-2023-24.pdf>

<sup>6</sup> OfS, 2023, Recurrent funding for 2023-24: <https://www.officeforstudents.org.uk/media/7508e0ef-7c25-46d9-913e-79807965d586/recurrent-funding-for-2023-24.pdf>

<sup>7</sup> IfATE, Higher technical qualifications: <https://www.instituteforapprenticeships.org/qualifications/higher-technical-qualifications/>

<sup>8</sup> OfS condition B3: 'The provider must deliver positive outcomes for students on its higher education courses'

- b. Eligible students on HTQs will be granted early access to the LLE when it is introduced in 2025/26, indicating a need to understand and monitor performance for the protection of students and taxpayers.
- c. The government has asked the OfS to consider ensuring that Level 4 and 5 provision and technical qualifications are fully reflected in its quality assessment, necessitating the identification of HTQs in student outcomes data to avoid duplication in regulatory effort.
- d. With student numbers on HTQs expected to increase over time, different numerical thresholds may need to be applied to them. Publishing data on HTQs as a split indicator would allow the OfS to test the extent to which a different numerical threshold compared with other OUG courses may be appropriate.

To that end, the OfS sought views on its proposal through a public consultation.<sup>9</sup>

In Autumn 2023, the OfS commissioned Pye Tait Consulting, an independent research agency, to undertake an analysis of the responses received. This report presents a summary of the responses gathered through the consultation exercise.

## 1.2 Aim and objectives

The overarching aim of this research was to analyse all consultation responses and to report the outcomes to the OfS. Specific objectives were to:

- conduct an objective and comprehensive qualitative analysis of all responses to the consultation,
- identify and categorise themes, focus areas, or questions, and
- report on the findings.

## 1.3 Methodology

### 1.3.1 Consultation approach

The OfS developed the consultation questionnaire which comprised three questions:

- one closed question to understand the extent of agreement with the OfS proposal to introduce a split indicator that would result in it publishing information and regulating the outcomes for students studying on HTQs,
- one follow-up open question for additional comments, and
- one open question asking for any alternative views or preferred approaches that the OfS could take to regulating outcomes for students studying on HTQs.

The consultation questions are in Appendix 1, and the structure of this report aligns with the consultation.

The consultation window was open from 27 July to 9 November 2023. The main route to submit responses was through the OfS online 'smart survey' portal. In total, 39 responses were received.

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<sup>9</sup> OfS: <https://www.officeforstudents.org.uk/publications/consultation-on-the-inclusion-of-higher-technical-qualifications-in-office-for-students-student-outcome-measures/>

The OfS shared all responses with Pye Tait Consulting, having first removed any personal data from responses where consent had not been granted, in line with the OfS privacy policy and data sharing agreement. Pye Tait Consulting then undertook analysis of all responses.

### **1.3.2 Approach to the analysis**

Before detailed analysis, responses were first reviewed and cleaned. The review process involved checking for campaign responses, errors, blank, or duplicate responses. Two blank responses were found and removed, leaving 37 unique, valid responses for onward analysis.

Responses were analysed overall, and subsequent subgroup analysis was undertaken to explore any notable differences by:

- organisation type, and
- respondent type.

### **1.3.3 Approach to grouping of respondents**

Respondents were asked to select which category best described them from a list of pre-defined options.

- Student (higher education)
- Student representative or from a student organisation
- Teaching staff, professional services staff or leader at a higher education provider
- Higher education sector body
- Professional, Statutory and Regulatory Bodies (PSRBs)
- Other.

Respondents were also asked whether they were submitting a collective response on behalf of their organisation, or an individual response.

These two sets of categories were then used for cross-tabulation analysis – to identify any notable patterns or differences in responses between different groups of respondents. For this analysis, the groups are “type of respondents’ organisation” and “individual vs collective”.

Qualitative analysis of responses received to the open-ended questions was undertaken by Pye Tait Consulting in three successive stages:

1. High-level review of all responses to identify broad themes and sentiment.
2. Identification of key themes arising in response to each question. A coding framework was developed based on key themes by Pye Tait Consulting, with checks for inter- and intra-coding, and consistency. The coding framework was finalised in collaboration with the OfS.
3. A comprehensive review to align each response to the coding framework, and to identify frequency of themes overall and by respondent subgroup.

On completion of each stage, outcomes were discussed with the OfS before moving forward to the next phase.

Quantitative analysis of the closed questions was undertaken in Excel.



Responses were analysed at an overall level, and subsequently subgroup analysis was undertaken to explore any notable differences by:

- respondent type, and
- organisation type.

#### **1.3.4 Interpretations and limitations**

An open consultation of this nature does not seek to be a representative sample of the whole population. The implication of self-selection bias is that an assessment of views can be made only for the respondents who choose to participate and will not represent the entire target population, but rather a small subset. As such, the findings should be interpreted with that caveat in mind.

It should be noted that some responses were received from representative bodies reflecting the views of their community. Organisational responses, including those from representative bodies, have not been weighted in the analysis; in effect, this means each response has an equal weight, although trends by organisation type are drawn out in the report. The reader is advised to bear these points in mind when interpreting the report.

Each subsection outlines the number of respondents providing views in response to that question. The numbers and percentages quoted relate to each consultation question being discussed, not to the overall total number of consultation respondents.

Some respondents both agreed and disagreed with different aspects of the proposal. Common themes were identified among responses, and counts for each theme/code were tallied, meaning some responses were counted more than once per question as more than one theme/code was covered. The result is that numbers in the report may not add up to 100 per cent.

Themes arising among responses to each question are generally presented in order from most to least frequent themes, with the descriptors 'many', 'several', and 'some' being used in cascading order to represent relative weight of feeling for each subsection.

The final coding book containing all coded responses for each question, developed by Pye Tait Consulting, has been provided to the OfS.

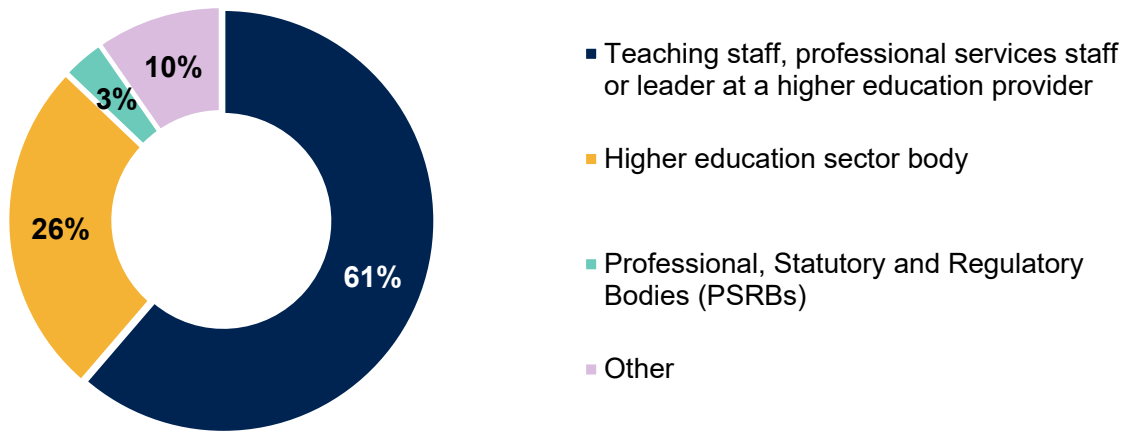
Note that some anonymised quotations from respondents are included in the report. These extracts are included to provide examples that reflect the most common points raised.

### **1.4 Respondent profile overview**

Of the 37 valid responses received, 29 (78 per cent) were submitted by organisations as a collective response, and two (5 per cent) were from individuals. The other six respondents did not consent to provide this information.

Respondents were presented with a pre-defined list of options and asked which best described them. Of the 31 who answered and consented to sharing such data, 19 (61 per cent) are teaching staff, professional services staff or leaders at a higher education provider, eight (26 per cent) are higher education sector bodies, and one a PSRB (3 per cent). Three (10 per cent) selected the 'other' category; these specified their organisation as a collaborative network of schools, colleges, universities and significant others; an awarding body; and government department (DfE).

**Figure 1: Breakdown of respondent type**



Base: 31 respondents. Source: OfS consultation 2023.

## 2. Key findings

Feedback received to the proposal to introduce a separate split indicator for HTQs, including the anticipated effects of that change, timings, and potential regulatory burden, are discussed in this section.

Section 2.1 presents findings on the level of agreement with the proposal and general views.

Section 2.2 outlines alternative suggestions put forward by respondents, particularly those who do not agree with the proposal.

### 2.1 Views on introducing HTQs as a split indicator

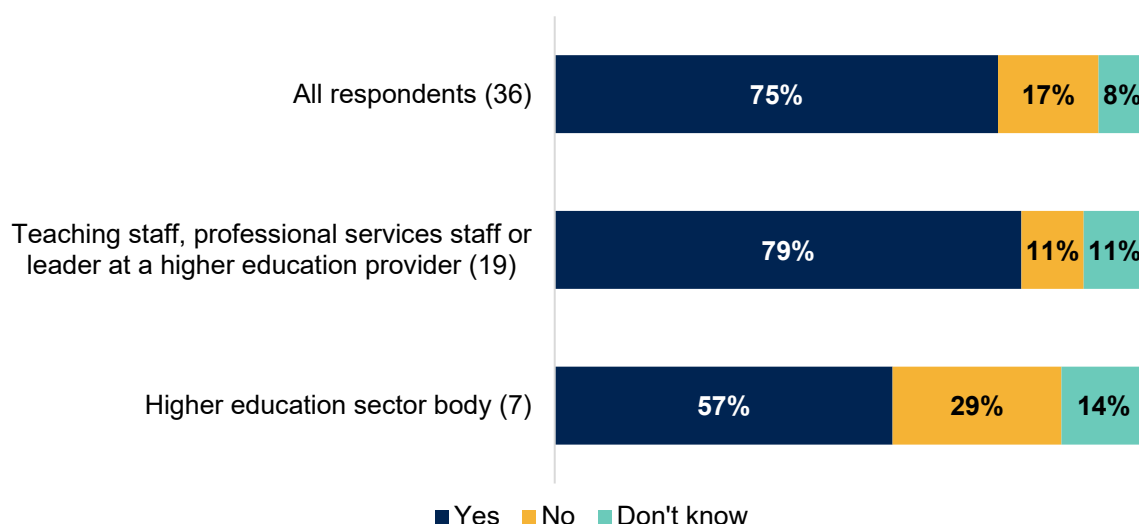
Respondents were asked whether they agree that the OfS should introduce a split indicator that would result in it publishing information and regulating the outcomes for students studying on HTQs.

Of the 36 respondents who answered this question:

- 27 respondents (75 per cent) agree,
- six (17 per cent) do not agree, and
- three (8 per cent) are unsure.

Teaching staff, professional services staff or leaders at a higher education provider show a higher level of agreement (79 per cent) and lower level of disagreement (11 per cent) compared with higher education sector bodies (57 per cent agree and 29 per cent disagree) (NB small sample sizes). Other respondent categories are not included in Figure 2 due to small sample sizes.

**Figure 2: Do you agree that the OfS should introduce a split indicator that would result in it publishing information and regulating the outcomes for students studying on HTQs (by respondent organisation type)?**



Source: OfS consultation 2023.

Most (31 respondents) took the opportunity to provide additional comments. Regardless of whether they agree with the proposal, disagree, or do not know, several common themes

arose among responses. Indeed, some of those who stated they 'agree' put forward considerations, and some of those who 'disagree' outlined positive aspects of the proposal.

### Assessing student outcomes

Nine respondents (29 per cent) discussed the usefulness of introducing a split indicator for HTQs in assessing student outcomes. Reasons given include that:

- enhanced granularity of data would be more valuable and informative for student choice (seven respondents, 23 per cent) – this was most commonly mentioned by teaching staff, professional services staff or leaders at higher education providers. One provider (3 per cent) welcomed the split indicator enabling deeper analysis of HTQ student outcomes as well as a specific quality assurance matrix.

'This separation can provide valuable insights, enabling more meaningful comparisons between HTQs and other undergraduate provision. It also promotes transparency and facilitates informed decision making for prospective students. For providers, this separation could help in strategic planning and resource allocation.' – Collective response, Teaching staff, professional services staff or leaders at higher education providers.

- HTQs as a split indicator would be valuable for the government and anyone else with an interest in assessing providers or courses (two respondents, 6 per cent). One provider (3 per cent) added that it will ensure that student and taxpayer investment is focused on providers and courses that deliver positive outcomes. Another teaching staff, professional services staff or leader at higher education provider (3 per cent) added that more granular data would allow the OfS to monitor take-up and awareness of HTQs and assess their overall effectiveness.

'This is important for the sector to understand the profile of learners, measure growth, and monitor performance in terms of access, continuation and completion.' – Collective response, A collaborative network of schools, colleges, universities and significant others

Four respondents (13 per cent) suggested alternative considerations relating to the reporting of outcomes, that might be useful for the regulator (and could minimise burden for providers), including:

- considering reporting outcomes at a national and/or subject level (three respondents, 10 per cent), and
- while outside the scope of this consultation, one respondent (3 per cent) suggested adopting criteria for success to recognise achievement for students who reach degree standard from a lower base of prior attainment.

### Consideration of provider burden

Thirteen respondents (42 per cent) highlighted a desire for there not to be any additional burden placed upon providers. This was in relation to regulatory and administrative burden (eight respondents, 26 per cent), as well as data analysis and reporting (eight respondents, 26 per cent). It was stressed, predominantly by providers, that providers already have extensive responsibilities and so minimising burden ought to be a priority. One respondent (3 per cent) added that there are already too many split indicators for providers to report on.

### Associated data issues

Seven respondents (23 per cent), predominantly teaching staff, professional services staff or leaders of higher education providers, highlighted considerations around data issues associated with introducing a HTQ split indicator.

Of these, two respondents (6 per cent) mentioned the volatility of HTQ data, and three (10 per cent) argued that HTQ data is likely to be unrepresentative. These respondents argued that there may be statistical uncertainty in HTQ data due to current and potential low student numbers in the near future, and further added that the grouping together of students studying Level 4 and 5 HTQs within the data may result in an inaccurate representation.

Further two respondents (6 per cent) explicitly stated that they think there will be a large number of suppressed cells in the HTQ data. It was a common view that more useful data will be achieved when there are fewer suppressed cells and unreportable fields within the HTQ data, allowing for meaningful comparisons both between HTQs and with other undergraduate provision.

‘Splitting out the OUG code further will make less of our data reportable and more of our data showing less confidence in statistical certainty.’ –  
Collective response, Higher education sector body

Finally, two respondents (6 per cent), both teaching staff, professional services staff or leaders at a higher education provider, added how low student numbers may mean data cannot be reported at a provider or at a course level. They suggested that, until numbers have increased, the OfS instead reports on sector-wide outcomes and compares Level 4 HTQ data with other Level 4 OUG data and Level 5 HTQ data with other Level 5 OUG.

### Suggestion to reconsider timelines

A total of nine respondents (29 per cent) suggested it would be beneficial for the OfS to wait to implement its proposals until there is greater student uptake in HTQs. Of these, eight respondents (26 per cent) added that this is in order for more accurate and useful data to be generated.

These respondents suggested waiting until these qualifications are fully embedded into institutions and have a larger student cohort so data are robust and stable to then be able to decide whether viewing data as a split indicator or establishing HTQs aside from other Level 4 and 5 courses would have greater regulatory value. These respondents are predominantly teaching staff, professional services staff or leaders at a higher education provider, and higher education sector bodies. They suggested that, until HTQs are fully embedded into institutions, they should remain within the Level 4 and 5 split, but not published. The data could then be modelled within an interim period where providers can review any data produced without publication or regulation.

Whilst no specific timelines are given, two respondents (6 per cent) suggested the OfS should wait a few years before reviewing whether to implement HTQ as a split indicator.

‘We are not confident that this is the right time to use those indicators to take punitive action against providers; this should be reserved for when HTQs are fully embedded and should therefore be subject to a phased introduction.’ – Individual response, Teaching staff, professional services staff or leader at a higher education provider

## Review of certain measures

Six respondents (19 per cent) argued that certain measures need to be reviewed by the OfS, which could be done following the increased uptake of HTQs.

‘We understand that initially the HTQ split indicator will sit under the OUG indicator and adhere to the same numerical thresholds. We would however ask that this is kept under review to ensure that it remains appropriate, as a miscellaneous category such as ‘other’ can be misleading and data may be skewed over time if HTQs become numerous. We note that this is one of the reasons given for the OfS proposing the split indicator approach and we welcome it.’ – Collective response, Teaching staff, professional services staff or leader at a higher education provider

Two respondents (6 per cent) voiced that the progression measure should be reviewed to allow for some courses currently categorised as ‘unskilled’ to be added.

Two respondents (6 per cent) suggested reviewing the minimum numerical threshold, to ease the reporting burden for providers in relation to HTQ rollout. Whilst no specific numerical threshold is mentioned, respondents discussed considering how the HTQ minimum thresholds relate to other model and level thresholds set out, to ascertain the appropriateness of retaining the current measures of success expected.

‘As the briefing mentioned that the split indicator would allow the OfS to “take regulatory action, where appropriate, in relation to the outcomes for students studying HTQs”, it would give the sector more confidence if the split indicator was introduced once the roll-out issues with HTQs have been fully resolved. There is a sense within the FE [further education] sector at least that we are not yet at this stage. Clearly providers should be accountable for the outcomes they deliver for students, but equally they should not be punished for issues outside of their control.’ – Individual response, Teaching staff, professional services staff or leader at a higher education provider

Two respondents (6 per cent) suggested reconsidering the progression measure, for example such that skilled manual roles are included and that this is applied to all providers and qualification levels. They explained that this would allow for greater recognition of students with lower educational achievement prior to studying on an HTQ and greater inclusion of HTQs directly leading to employment classified as ‘professional’.

## Other comments

Other themes present within the responses included:

- distinguishing, within the split indicator, by method of course delivery (three respondents, 10 per cent) or by course level (three respondents, 10 per cent), and
- considering how smaller cohorts (four respondents, 13 per cent) and mixed cohorts, where HTQ students are taught in groups with students on non-HTQ courses (one respondent, 3 per cent) will affect the value and accuracy of HTQ data generated for assessment and comparison between HTQs and against other undergraduate provision.

## 2.2 Preferred approach for regulating outcomes for students studying HTQs

Respondents were asked, if they do not agree with the OfS proposal, if they have a preference for the approach that the OfS should take to regulating outcomes for students studying on HTQs. Ten responses were received, including from one who agrees with the OfS proposal, six from those who disagree, and three from those who are unsure.

Four respondents (40 per cent) would prefer for HTQs to be introduced as an indicator, rather than a split indicator of OUG HTQs, as this would enable performance of different demographic groups studying HTQs to be analysed in more detail, and will offer a longer-term approach. One (10 per cent) noted that this will allow the understanding of performance for different demographic groups studying HTQs and will offer a logical long-term approach. One other respondent (10 per cent) referred to OfS B conditions of registration applied to HTQs, and that it is too soon to mirror B3 thresholds from other Level 4 and 5 qualifications due to a lack of comparative data to show how students have performed in assessments. They noted that this approach, using split indicators with individual B3 conditions, will work well in the future when the dataset is more robust.

‘We appreciate the approach taken to separate HTQs aside from other Level 4 and 5 courses, which we believe will have value, but it is not yet possible to determine what will have greater regulatory value – viewing this data by split indicator, or establishing HTQs as a level of study.’ –  
Collective response, Teaching staff, professional services staff or leader at a higher education provider

Two respondents (20 per cent) discussed a preference for the OfS to consider wider higher education policy, including:

- ongoing changes to university foundation year funding to deliver more Level 4 programmes to widen participation in the context of comparing HTQ outcomes with other undergraduate qualifications by level (one respondent, 10 per cent), and
- declining staff retention rates that may impact the delivery of HTQs for disadvantaged students (one respondent, 10 per cent).



### 3. Conclusions

This report has provided an overview of responses received to the OfS consultation relating to the inclusion of HTQs in the OfS student outcome measures.

Based on the analysis of the 37 unique responses received to the consultation, this section does not seek to cover the detail of all points raised in the consultation, but draws together the themes and considerations most commonly raised by respondents, acknowledging instances where there is a range of views on certain topics.

#### General agreement with the OfS's proposal

The majority (27 respondents, 75 per cent) agreed with the OfS proposal for introducing HTQs as a split indicator. Having more granular data, respondents believe, will be helpful for everyone involved in higher education, including for students researching available courses, providers, and regulators in the process of assessing providers and courses.

#### Potential burden for providers

Some respondents (13, 42 per cent) asserted that introducing HTQs as a split indicator could present a burden for providers, for example when it comes to collecting data for quality assurance purposes and for measuring student outcomes. Potential administrative, regulatory and data burdens are anticipated due to HTQs not being fully implemented yet and therefore likely not providing representative evidence. These points were raised in relation to the requirement for data collection and reporting, likely creating additional work for providers. There was an argument that too many split indicators already exist and this would add another layer of responsibility for providers.

#### Associated data issues

Respondents discussed potential issues around data collection and reporting, if HTQs were to be a split indicator. Some providers noted that the numbers of students at studying HTQs are still relatively low and therefore that data would either not be reliable or would lead to suppression. These points were most commonly raised by teaching staff, professional services staff or leaders of higher education providers.

#### Consideration on the proposal timeframes

It was suggested that the OfS reconsiders the timeframe for introducing HTQs as a split indicator. This could be done in a few years once HTQs have been fully implemented and student numbers are higher (no specific date was mentioned). Teaching staff, professional services staff or leaders at a higher education provider, and higher education sector bodies, predominantly suggested this, and noted that a delay would ensure more robust and stable data, because uptake of HTQs would be greater.

#### HTQs as an indicator

One alternative suggestion to the OfS proposal was to introduce HTQs as its own indicator, rather than as a split indicator of 'other undergraduate' HTQs. Respondents feel this will improve measuring student outcomes, through an increased understanding of performance for different demographic groups studying HTQs and could be a logical long-term approach.



## Appendix 1: Consultation questions

1. Do you agree that the OfS should introduce a split indicator that would result in it publishing information and regulating the outcomes for students studying on HTQs?
2. If you do not agree, do you have a preference for the approach that the OfS should take to regulating outcomes for students studying on HTQs?

The full consultation document explains the background of the OfS's proposal for introducing HTQs as a split indicator in student outcome measures, including the details of the proposal, its timings, and consequential changes it could bring.

[See the full consultation document.](#)

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