

Annex F: Alternative options considered

Introduction

1. In developing the proposals set out in this consultation, we considered a number of alternative approaches to assessing and recognising quality in higher education. This annex summarises the principal alternatives considered and the reasons why we are proposing a different approach.

Mandatory participation in TEF for all providers

2. Following the stage one consultation, our intention was that all registered providers would participate in TEF on a cyclical basis. Under this approach, all providers selected for assessment would be required to seek TEF ratings, and participation would be a requirement of condition B6.
3. Providers with sufficient data would receive ratings based on the full range of evidence used in TEF. Providers without sufficient data would not be assessed or receive ratings. In time we would develop alternative arrangements for providers without sufficient data to support a student experience rating.
4. In developing these proposals, we considered how best to integrate assessment against the minimum quality requirements with TEF, and how both should operate alongside our risk monitoring and investigation activity.
5. We concluded that all providers should be subject to periodic assessment against the minimum quality requirements. This provides assurance that providers continue to satisfy the relevant conditions of registration and creates a common assessment framework across the sector.
6. We considered whether participation in TEF should be mandatory for all providers, and concluded this was not necessary in circumstances where we would be assessing every provider for compliance. We expect that the majority of providers will choose to seek a TEF rating, because of the benefits associated with participation and the value of publicly recognised ratings. However, we do not consider it necessary to require participation in TEF in order to achieve the objectives of the quality system.
7. Through our continued engagement with the sector, including smaller and specialist providers, we have heard that some providers do not consider TEF to be appropriate for their circumstances or do not wish to seek a TEF rating.
8. We have therefore designed an approach in which all providers participate in a common assessment against the minimum quality requirements, while providers that meet the relevant requirements for TEF may choose whether to seek a rating.
9. As we gain experience of operating the integrated quality system and continue to develop our approach to TEF, including considering alternative approaches to generating ratings for different types of provider, we may wish to revisit this position in future.

Risk-based assurance for providers without sufficient data

10. We considered an alternative approach under which providers with sufficient data to support TEF ratings would be required to participate in TEF. Providers without sufficient data to support a student experience TEF rating would instead be subject to a risk-based assessment focused on identifying whether there were concerns about compliance with minimum requirements.
11. Under this approach:
 - providers with sufficient data would receive TEF ratings through a mandatory assessment process
 - providers without sufficient data would undergo a light-touch review of available information
 - where that review identified no significant concerns, no assessment outcome would be published
 - where concerns were identified, we could undertake further assessment activity and reach conclusions about compliance with the minimum quality requirements.
12. This approach would allow us to rule out concerns without undertaking a fuller assessment.
13. We concluded that this approach would not provide an appropriate or consistent level of assurance that all providers continue to meet minimum requirements. Under this alternative model, some providers would only receive an outcome where concerns were identified. It would also rely on the absence of concerns for assurance that requirements continued to be met.
14. We considered that this would create a different regulatory approach for a subset of providers and would weaken the principle that all providers should be assessed through a common quality framework.
15. The approach would also create a distinction between providers receiving published quality outcomes and providers for which no equivalent outcome was available, making it more difficult for students and other stakeholders to understand how quality had been assessed across the sector.

Separate assessment routes for compliance and TEF

16. We considered proposing separate and distinct assessment routes for compliance with the minimum quality requirements and for TEF. Under this approach, providers seeking only to demonstrate compliance with the relevant conditions of registration would participate in a compliance assessment, operating through separate guidance and processes. Providers seeking a TEF rating would participate in a separate assessment process designed specifically for the purposes of TEF.
17. This would have some potential advantages, with a clear separation of compliance from TEF. As we considered this approach we found there would be operational complexities and it

would not provide an integrated approach to quality assessment, which has been a fundamental aim of the reform of the quality assessment system.