

# Setting numerical thresholds for condition B3

## Purpose of this document

1. The purpose of this document is to provide information about how we have set our proposed numerical threshold levels and the data we have used. It also includes the levels for each proposed numerical threshold. It is part of the proposals we have set out in our consultation<sup>1</sup> and should be considered in conjunction with that document.
2. This document uses student outcome measures that have been produced in line with the proposals included in our consultation on outcomes and experience data.<sup>2</sup>
3. This document includes:
  - a. A summary of the process we have followed to set out proposed numerical thresholds and information on the data used to support this process.
  - b. A summary table of proposed numerical thresholds.
  - c. Details of our analysis and reasoning for identifying the proposed level for each proposed numerical threshold – by indicator, level and mode of study.

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<sup>1</sup> See [www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/student-outcomes/](http://www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/student-outcomes/).

<sup>2</sup> See [www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/outcome-and-experience-data/](http://www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/outcome-and-experience-data/).

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## Introduction

4. Our main consultation document includes proposals for how we will set numerical thresholds (in Proposal 3 and in Annex F).
5. Our proposed approach which we have implemented in this document to produce proposed numerical threshold levels has three parts:
  - a. Identification of the starting point for a numerical threshold using analysis of sector performance.
  - b. Consideration of policy and contextual factors.
  - c. Setting final numerical threshold.
6. We have set out in the sections below the data analysis that supports each of these steps. We have set out in Annex B how these steps have been taken for each of the proposed numerical indicators.

## Identification of starting point

7. The purpose of this stage is to make a judgement about the point at which we consider there be to minimal risk that a higher education provider is not delivering positive outcomes. We refer to this as the 'starting point value'.
8. We have reviewed the following data analyses when considering where the appropriate starting point value should be for each proposed numerical threshold.

### **Anonymised sector distributions for the indicator**

We use graphs that show the point estimate indicator values for every registered higher education provider. These are not weighted by the size of the provider, or the student population informing calculation of the indicator (its denominator). This means that the student outcomes delivered by each provider carry equal value for this purpose. These charts are available in interactive format on our website [link] but are also shown in Annex B of this document.

### **The sector overall rate**

This is the rate at which students in the sector overall achieve each outcome that we measure, for each level and mode of study. This value is not calculated from provider-level indicator values. It expresses the total number of students who achieve each positive student outcomes, as a proportion of the total number of students for whom we are measuring that outcome.

### **The median performance of providers in the sector**

We are proposing to use two different types of median value when setting the starting point value:

- Unweighted sector median performance – these medians are not influenced by the number of students in each provider’s student population which inform calculation of the indicator value.
- Weighted sector median performance – these medians are weighted to reflect each provider’s student population which inform calculation of the indicator value;

Weighted and unweighted medians have been calculated for each combination of level and mode of study. In addition, medians have also been calculated from distributions of split indicators.<sup>3</sup> All of these medians are available through the summary statistic tab in our published data dashboard.<sup>4</sup>

### Data used to support this step

9. All of the data described above is available through a series of interactive charts which we have published on our website.<sup>5</sup>
10. We have set out below the parameters we have applied to these charts when identifying the starting point values. This information is provided to enable readers to recreate the information in this document should they wish to.
11. For all analyses, we have reported indicators calculated for the taught or registered view of a provider’s student population (as defined in the outcome and experience data consultation) capturing all students either taught or registered by a provider.<sup>6</sup>
12. We have only used indicators where there is a denominator of greater than 23 students for all analyses. This means that we have only included data where there are more than 23 students included in the indicator for an individual provider. We have used this approach to align with the minimum reporting requirement that we define in the indicator consultation, which is designed to ensure that we are not considering data where individual students could potentially be identified.
13. For graduate outcomes data, we have included indicators for providers where the response rates are both above and below 50 per cent. We have used all responses because for this analysis we are considering data to support a judgement about performance at a sector level, rather than at provider level, and therefore think it is prudent to include all available data to allow a more complete understanding of sector performance.

<sup>3</sup> See Proposal 9 in [www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/outcome-and-experience-data/](http://www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/outcome-and-experience-data/).

<sup>4</sup> See <https://www.officeforstudents.org.uk/data-and-analysis/student-outcomes-and-experiences-data-dashboards/>.

<sup>5</sup> [www.officeforstudents.org.uk/data-and-analysis/student-outcomes-and-experiences-data-dashboards/sector-distributions-of-student-outcomes-dashboard/](http://www.officeforstudents.org.uk/data-and-analysis/student-outcomes-and-experiences-data-dashboards/sector-distributions-of-student-outcomes-dashboard/).

<sup>6</sup> See Proposal 2 in [www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/outcome-and-experience-data/](http://www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/outcome-and-experience-data/).

14. All analysis has been conducted without identification of individual providers.

## **Consideration of context and policy factors**

15. The purpose of this step is to account for the impact that different relevant contextual factors may have had on student outcomes in the past four years of data that contribute to the indicators.
16. Our proposed approach to setting numerical thresholds takes account of historic variation in performance for students with different characteristics, including combinations of characteristics by making a downward adjustment if this data shows a marked difference in the outcomes of different groups of students.
17. We will use information from our Exploring Student Outcomes Analysis to understand the general impact that different student and course characteristics currently tend to have for all providers in England. This analysis uses statistical modelling to identify the extent to which gaps between the outcomes of different student groups can be explained by other factors. We will use this analysis to inform our view of whether a downward adjustment from the starting point value is necessary for each indicator.

## **Our use of Exploring Student Outcomes**

18. Analysis developed by the Office for Students (OfS) uses statistical modelling to account for a range of student characteristics.<sup>7</sup> These correlate with the student outcomes we are proposing using to assess condition B3. This analysis uses the same underlying data as we propose using in our outcomes and experience data consultation.<sup>8</sup> It seeks to identify the marginal effects associated with different characteristics on in continuation, completion and progression outcomes.
19. We have proposed using this analysis to consider the maximum size of the observed marginal effects of different characteristics and whether it is appropriate to make a downward adjustment that would account for the impact this gap may have on providers in general. We expect to make a sufficiently large adjustment to allow for the typical variation between individual provider populations and the impact of multiple different characteristics. We do not expect to make an adjustment for observed gaps where the population of students covered by those gaps is so small as to make it unlikely that any one provider would recruit such a significant proportion of those students that it would affect its overall performance – we expect that this will mean that we would be less likely to make a downward adjustment for smaller populations of students in the analysis.
20. Annex A sets out how we have done this in practice and what we consider to be an appropriate adjustment for the following indicators relating to full- or part-time courses.

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<sup>7</sup> See [www.officeforstudents.org.uk/publications/exploring-student-outcomes/](http://www.officeforstudents.org.uk/publications/exploring-student-outcomes/).

<sup>8</sup> See Proposal 1 in [www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/outcome-and-experience-data/](http://www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/outcome-and-experience-data/).

21. As a result of our analysis, we are proposing that a 5 percentage point downward adjustment would be appropriate when setting each numerical threshold. We have described the effect of this downward adjustment for each of the numerical thresholds proposed in Annex B.

22. We have noted the following data constraints in the use of this analysis:

- a. The data used in this analysis is not disaggregated to the same detailed levels of study as the indicators we are proposing to set numerical thresholds for. We are only able to consider the data at undergraduate and postgraduate level. We have taken this into account when setting numerical thresholds and considered whether any further adjustment is needed for sector-wide contextual factors.
- b. The data used in this analysis is separated into UK-domiciled students and non-UK-domiciled students. We have considered the data on UK-domiciled students and non-UK-domiciled students separately in making our adjustments. We have done this because data on certain characteristics, for example Index of Multiple Deprivation (IMD) or Participation of Local Areas (POLAR) quintiles, free school meals eligibility and ethnicity as a measure of underrepresentation are not directly applicable to the data for non-UK-domiciled students and so do not effectively inform our analysis.
- c. We note that this analysis can only account for factors which we can observe in the data. It is possible that there remain unobserved factors correlated both with the student characteristic of interest and with the outcomes itself. Any unobserved factors could introduce statistical bias within the analysis.

### Consideration of other contextual and policy factors

23. We have set out in the main consultation document<sup>9</sup> the other contextual and policy factors that we will consider where to set a numerical threshold to ensure that it represents the point at which we consider we may need to intervene to protect students. Annex B sets out how we have taken these other factors into account in our proposed numerical thresholds.

### Final proposed numerical threshold

24. We have set out our proposed numerical threshold levels for each indicator in Annex B of this document.

25. The numerical threshold levels shown represent the percentage of students achieving positive outcomes for each measure.

**Table 1: Summary of proposed numerical threshold levels**

Level and mode of study	Continuation	Completion (cohort tracking)	Completion (compound indicator)	Progression
FT Other UG	75%	65%	65%	45%
FT First degree	80%	75%	75%	60%

<sup>9</sup> See [www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/student-outcomes/](http://www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/student-outcomes/).

FT UG with PG components	85%	85%	80%	80%
FT PGCE	85%	85%	85%	85%
FT PG taught masters	80%	80%	80%	70%
FT PG Other	80%	80%	80%	85%
FT PG research	90%	75%	75%	85%
PT Other UG	55%	55%	55%	65%
PT First degree	60%	55%	55%	75%
PT UG with PG components	60%	60%	60%	80%
PT PGCE	75%	75%	75%	85%
PT PG taught masters	65%	65%	65%	85%
PT PG Other	65%	60%	65%	85%
PT PG research	70%	60%	60%	85%
Apprenticeship – UG	70%	55%	55%	75%
Apprenticeship – PG	80%	80%	80%	80%

Note: 'FT' = 'full-time'; 'PT' = 'part-time'; 'UG' = 'undergraduate'; 'PG' = 'postgraduate'.

## Annex A: Use of Exploring Student Outcomes analysis and setting numerical thresholds

1. The OfS has conducted regression analysis, which we have called 'Exploring Student Outcomes', to identify factors associated with differences in continuation, completion and progression outcomes, and to better understand the extent to which these differences can be accounted for by other underlying differences in student characteristics. Details of this analysis, the student characteristics included and the methodology we have used are available.<sup>10</sup>
2. We propose to control for all factors considered within this analysis except for higher education provider when identifying the material effects of different characteristics. We do not consider it appropriate to control for 'provider' in these circumstances because the purpose of setting numerical thresholds is to identify providers where performance is below minimum expectations. If we included provider as a factor in analysis, we would be making an adjustment for the factor that we are seeking to regulate.
3. This analysis is conducted at 'undergraduate' and 'postgraduate' levels. As set out in our consultation document, we propose that we determine a downward adjustment that will normally be made to the disaggregated levels of study that are within these levels where we propose to set numerical thresholds.
4. This means that when we set proposals for numerical thresholds for first degree, other undergraduate and undergraduate courses with postgraduate components we would use the downward adjustment identified from our 'undergraduate' analysis.
5. We propose that downward adjustments should generally be determined with reference to the largest estimated differences. However, where the largest differences relate to student groups with relatively small populations in the higher education sector, we may choose not to account for the whole of the estimated difference in setting the downward adjustments for different modes and levels of study. We think this is appropriate because where the total student population is small it is unlikely that any single provider will have a student body with enough of these students for it to materially affect their performance against the proposed numerical threshold. However, we recognise that there may be a handful of providers where this is the case. We expect that our proposal for considering the context in which individual providers operate, including understanding their individual provider benchmark, when taking regulatory decisions will enable us to take account of this.<sup>11</sup>
6. This annex sets out our proposed downward adjustment for undergraduate and postgraduate provision. The data underpinning this section can be found on our published data dashboard.<sup>12</sup> All estimated differences and rates are rounded to one decimal place, while the number of

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<sup>10</sup> See [www.officeforstudents.org.uk/publications/exploring-student-outcomes/](http://www.officeforstudents.org.uk/publications/exploring-student-outcomes/).

<sup>11</sup> See Proposal 5 in [www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/student-outcomes/](http://www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/student-outcomes/).

<sup>12</sup> See <https://www.officeforstudents.org.uk/data-and-analysis/student-outcomes-and-experiences-data-dashboards/>.

students within each category is rounded to the nearest five. Student numbers are suppressed when there are fewer than 25 students (after rounding) in the chosen category.

- In accordance with our policy intentions set out in Proposal 3 of the consultation document, we have chosen not to take a formulaic approach to determining the level of each numerical threshold and instead will use our regulatory judgement to balance our policy aims.

## Undergraduate courses

### Continuation outcomes for full-time students

- We propose using a downward adjustment of **5 percentage points** when setting numerical thresholds for indicators for continuation outcomes for full-time undergraduate students.
- We are making this proposal because we consider that an adjustment at this level will enable us to take account of the impact that different student and course characteristics have had in the past on student outcomes.
- We note that making this adjustment would mean that there would be five groups of students where we have observed an estimated difference of more than our proposed adjustment after controlling for all factors apart from provider. These are set out in Table A1.
- We consider that, because of relatively low numbers of students and the small proportion within the overall population that these students represent, the possible impact of students in these groups is not likely to be material to any one provider's performance. Where we identify providers with performance below our numerical thresholds, we expect that our proposed approach to consideration of context through our engagement and formal decision making will provide adequate opportunity to address instances where a provider has a disproportionately large number of students from these groups compared with other providers in the sector.

**Table A1: Student groups with estimated difference greater than proposed adjustment**

Group	Upper confidence threshold (% points)	Estimated difference (% points)	Lower confidence threshold (% points)	Population	% of total population
<b>UK-domiciled</b>					
Gypsy or Traveller	-2.4	-6.0	-9.0	375	0.0
Other sex	-4.5	-6.5	-8.4	875	0.0
<b>Non-UK-domiciled</b>					
31 to 40 years	-5.5	-6.3	-7.1	3,580	0.2
41 to 50 years	-6.0	-7.8	-9.3	765	0.0
51 years and over	-14.0	-17.3	-19.9	190	0.0

## Completion outcomes for full-time students

12. We propose a downward adjustment of **5 percentage points** when setting numerical thresholds for completion outcomes for full-time undergraduate students.
13. We are making this proposal because we consider that an adjustment at this level will enable us to take account of the impact that different student and course characteristics have had in the past on student outcomes.
14. We note that making this adjustment would mean that there would be seven groups of students where we have observed an estimated difference of more than our proposed adjustment after controlling for all factors apart from provider. These are set out in Table A2.
15. We consider that, because of relatively low numbers of students and the small proportion within the overall population for this disaggregated level that these students represent, the possible impact of students in these groups is not likely to be material to any one provider's performance. Where we identify providers with performance below our numerical thresholds, we expect that our proposed approach to consideration of context through our engagement and formal decision making will provide adequate opportunity to address instances where a provider has a disproportionately large number of students from these groups compared with other providers in the sector.

**Table A2: Student groups with estimated difference greater than proposed adjustment**

Group	Upper confidence threshold (% points)	Estimated difference (% points)	Lower confidence threshold (% points)	Population	% of total population
<b>UK-domiciled</b>					
Mental health condition	-7.7	-8.1	-8.4	22,980	1.4
Other sex	-25.6	-30.0	-33.9	290	0.0
<b>Non-UK-domiciled</b>					
Mental health condition	-9.5	-10.8	-11.9	1,185	0.1
31 to 40 years	-4.2	-5.1	-5.9	3,435	0.2
41 to 50 years	-3.4	-5.5	-7.4	630	0.0
51 years and over	-6.6	-11.4	-14.9	130	0.0
Other sex	-21.7	-28.2	-32.2	45	0.0

## Progression outcomes for full-time students

16. We propose a downward adjustment of **5 percentage points** when setting numerical thresholds for progression outcomes for full-time undergraduate students.

17. We are making this proposal because we consider that an adjustment at this level will enable us to take account of the impact that different student and course characteristics have had in the past on student outcomes.
18. We note that making this adjustment would mean that there would be one group of students where we have observed an estimated difference of more than our proposed adjustment after controlling for all factors apart from provider, although we note that this analysis is not available for the progression indicator for non-UK-domiciled students. This is set out in Table A3.
19. We consider that, because of relatively low numbers of students and the small proportion within the overall population for this disaggregated level that these students represent, the possible impact of students in this group is not likely to be material to any one provider's performance. Where we identify providers with performance below our numerical thresholds, we expect that our proposed approach to consideration of context through our engagement and formal decision making will provide adequate opportunity to address instances where a provider has a disproportionately large number of students from this group compared with other providers in the sector.

**Table A3: Student groups with estimated difference greater than proposed adjustment**

Group	Upper confidence threshold (% points)	Estimated difference (% points)	Lower confidence threshold (% points)	Population	% of total population
<b>UK-domiciled</b>					
Social or communication impairment	-6.2	-7.9	-9.6	2,575	0.8

### Continuation outcomes for part-time students

20. We propose a downward adjustment of **5 percentage points** when setting numerical thresholds for continuation outcomes for part-time undergraduate students.
21. We are making this proposal because we consider that an adjustment at this level will enable us to take account of the impact that different student and course characteristics have had in the past on student outcomes.
22. We note that making this adjustment would mean that there would be eight groups of students where we have observed an estimated difference of more than our proposed adjustment after controlling for all factors apart from provider. These are set out in Table A4.
23. We consider that, because of relatively low numbers of students and the small proportion within the overall population for this disaggregated level that these students represent, the possible impact of students in this group is not likely to be material to any one provider's performance. Where we identify providers with performance below our numerical thresholds, we expect that our proposed approach to consideration of context through our engagement and formal decision making will provide adequate opportunity to address instances where a provider has a disproportionately large number of students from these groups compared with other providers in the sector.

**Table A4: Student groups with estimated difference greater than proposed adjustment**

Group	Upper confidence threshold (% points)	Estimated difference (% points)	Lower confidence threshold (% points)	Population	% of total population
<b>UK-domiciled</b>					
Mental health condition	-6.7	-7.9	-9.0	7,220	2.2
Asian or Asian British – Bangladeshi	-3.5	-5.7	-8.0	1,590	0.5
Black or black British – Caribbean	-4.4	-5.6	-6.9	5,585	1.7
Black or black British	-3.7	-6.2	-8.6	1,365	0.4
Mixed – white and black Caribbean	-4.6	-6.3	-8.0	2,820	0.9
<b>Non-UK-domiciled</b>					
Mental health condition	12.5	-7.6	-25.2	<25	0.0
Under 21 years	-2.3	-6.0	-9.6	725	0.3
51 years and over	2.2	-6.9	-15.7	115	0.1

### Completion outcomes for part-time students

24. We propose a downward adjustment of **5 percentage points** when setting numerical thresholds for completion outcomes for part-time undergraduate students.
25. We are making this proposal because we consider that an adjustment at this level will enable us to take account of the impact that different student and course characteristics have had in the past on student outcomes.
26. We note that making this adjustment would mean that there would be 15 groups of students where we have observed an estimated difference of more than our proposed adjustment after controlling for all factors apart from provider. These are set out in Table A5.
27. We consider that, because of relatively low numbers of students and the small proportion within the overall population that these students represent, the possible impact of students in these groups may not be material to any one provider's performance. Of the differences set out in the table, the performance difference for the largest group (UK-domiciled students aged 51 or over) is estimated to lie between -5.1 and -6.1 percentage points. However, this group comprises only 8.4 per cent of the overall population for this indicator. We therefore consider it unlikely that the impact of students in this group will have a material effect on any one provider's performance.

28. We consider this to be a balanced judgment as the proportion of students in groups where the estimated difference may be above the downward adjustment recommended is higher than for other outcomes. We consider that it is still reasonable to make this downward adjustment and, where we identify providers with performance below our numerical thresholds, we expect that our proposed approach to consideration of context through our engagement and formal decision making will provide adequate opportunity to address instances where a provider has a disproportionately large number of students from these groups compared with other providers in the sector.

**Table A5: Student groups with estimated difference greater than proposed adjustment**

Group	Upper confidence threshold (% points)	Estimated difference (% points)	Lower confidence threshold (% points)	Population	% of total population
<b>UK-domiciled</b>					
51 years and over	-5.1	-5.6	-6.1	39,160	8.4
Mixed – white and black Caribbean	-3.5	-5.1	-6.7	3,030	0.6
Asian or Asian British – Indian	-4.3	-5.2	-6.1	9,300	2.0
Gypsy or traveller	6.8	-5.2	-16.9	55	0.0
Multiple or other impairments	-4.7	-5.5	-6.3	14,615	3.1
Mental health condition	-4.9	-6.4	-7.9	4,015	0.9
Other sex	0.3	-51.9	-99.7	<25	0.0
<b>Non-UK-domiciled</b>					
Mental health condition	8.4	-11.3	-31.0	<25	0.0
Multiple or other impairments	-2.1	-11.9	-20.7	70	0.0
Social or communication impairment	19.7	-18.6	-49.2	<25	0.0
Under 21 years	-4.4	-5.7	-6.9	2,810	0.6
26 to 30 years	-5.4	-7.4	-9.2	2,385	0.6
31 to 40 years	-14.0	-16.1	-18.0	2,435	0.6
41 to 50 years	-16.8	-19.5	-22.1	995	0.2
51 years and over	-26.0	-30.2	-34.1	355	0.1

## Progression outcomes for part-time students

29. We propose a downward adjustment of **5 percentage points** when setting numerical thresholds for progression outcomes for part-time undergraduate students.
30. We are making this proposal because we consider that an adjustment at this level will enable us to take account of the impact that different student and course characteristics have had in the past on student outcomes.
31. We note that making this adjustment would mean that there would be six groups of students where we have observed an estimated difference of more than our proposed adjustment after controlling for all factors apart from provider, although we note that this analysis is not available for the progression indicator for non-UK-domiciled students. These are set out in Table A6.
32. We consider that, because of relatively low numbers of students and the small proportion within the overall population for this disaggregated level that these students represent, the possible impact of students in this group is not likely to be material to any one provider's performance. Where we identify providers with performance below our numerical thresholds, we expect that our proposed approach to consideration of context through our engagement and formal decision making will provide adequate opportunity to address instances where a provider has a disproportionately large number of students from these groups compared with other providers in the sector.

**Table A6: Student groups with estimated difference greater than proposed adjustment**

Group	Upper confidence threshold (% points)	Estimated difference (% points)	Lower confidence threshold (% points)	Population	% of total population
<b>UK-domiciled</b>					
Social or communication impairment	3.4	-5.1	-11.8	90	0.3
Mental health condition	-5.3	-8.5	-11.3	605	1.9
Asian or Asian British – Pakistani	-0.5	-5.1	-9.2	460	1.5
Asian or Asian British – other	-1.5	-5.3	-8.6	335	1.1
Black or black British – African	-4.0	-6.2	-8.2	975	3.1
Black or black British – other	-1.0	-7.6	-12.9	130	0.4

## Postgraduate courses

### Continuation outcomes for full-time students

33. We propose a downward adjustment of **5 percentage points** when setting numerical thresholds for continuation outcomes for full-time postgraduate students.
34. We are making this proposal because we consider that an adjustment at this level will enable us to take account of the impact that different student and course characteristics have had in the past on student outcomes.
35. We note that making this adjustment would mean that there would be nine groups of students where we have observed an estimated difference of more than our proposed adjustment after controlling for all factors apart from provider. These are set out in Table A7.
36. We consider that, because of relatively low numbers of students and the small proportion within the overall population for non-UK-domiciled students within this disaggregated level that these students represent, the possible impact of students in this group may not be material to any one provider's performance. Of the differences identified above, the performance difference for the largest group of UK-domiciled students (those aged 31 to 40) is estimated to lie between -5.0 and -5.4 percentage points. However, this group comprises only 5.4 per cent of the overall population for this indicator. We therefore consider it unlikely that the impact of students in this group will have a material effect on any one provider's performance and expect a downward adjustment of 5 percentage points to be sufficient for most providers.
37. We consider this to be a balanced judgment as the proportion of students in groups where the estimated difference may be above the downward adjustment recommended is higher than for other outcomes. We consider that it is still reasonable to make this downward adjustment and, where we identify providers with performance below our numerical thresholds, we expect that our proposed approach to consideration of context through our engagement and formal decision making will provide adequate opportunity to address instances where a provider has a disproportionately large number of students from these groups compared with other providers in the sector.

**Table A7: Student groups with estimated difference greater than proposed adjustment**

Group	Upper confidence threshold (% points)	Estimated difference (% points)	Lower confidence threshold (% points)	Population	% of total population
<b>UK-domiciled</b>					
31 to 40 years	-5.0	-5.2	-5.4	43,885	5.4
41 to 50 years	-8.2	-8.5	-8.8	22,695	2.8
51 years and over	-11.4	-11.9	-12.3	8,780	1.1
Social or communication impairment	-4.3	-5.5	-6.5	1,515	0.2

Mental health condition	-6.0	-6.4	-6.8	12,535	1.5
Black or black British – African	-5.1	-5.6	-6.0	25,760	3.1
Black or black British – Caribbean	-5.4	-6.1	-6.7	5,525	0.7
Black or black British – other	-4.7	-6.1	-7.3	1,445	0.2
<b>Non-UK-domiciled</b>					
51 years and over	-7.3	-8.2	-8.9	1,070	0.1

### Completion outcomes for full-time students

38. We propose a downward adjustment of **5 percentage points** when setting numerical thresholds for completion outcomes for full-time postgraduate students.
39. We are making this proposal because we consider that an adjustment at this level will enable us to take account of the impact that different student and course characteristics have had in the past on student outcomes.
40. We note that making this adjustment would mean that there would be seven groups of students where we have observed an estimated difference of more than our proposed adjustment after controlling for all factors apart from provider. These are set out in Table A8.
41. We consider that, because of relatively low numbers of students and the small proportion within the overall population for this disaggregated level that these students represent, the possible impact of students in this group is not likely to be material to any one provider's performance. Where we identify providers with performance below our numerical thresholds, we expect that our proposed approach to consideration of context through our engagement and formal decision making will provide adequate opportunity to address instances where a provider has a disproportionately large number of students from these groups compared with other providers in the sector.

**Table A8: Student groups with estimated difference greater than proposed adjustment**

Group	Upper confidence threshold (% points)	Estimated difference (% points)	Lower confidence threshold (% points)	Population	% of total population
<b>UK-domiciled</b>					
Black or black British – other	-4.0	-5.5	-6.9	905	0.1
Mental health condition	-7.1	-7.7	-8.2	4,120	0.6

41 to 50 years	-8.3	-8.6	-8.9	17,065	2.5
51 years and over	-12.1	-12.6	-13.0	5,115	0.7
<b>Non-UK-domiciled</b>					
Mental health condition	-4.3	-5.1	-5.8	1,565	0.2
41 to 50 years	-4.7	-5.2	-5.7	5,375	0.8
51 years and over	-9.6	-10.6	-11.5	1,010	0.1

### Progression outcomes for full-time students

42. We propose a downward adjustment of **5 percentage points** when setting numerical thresholds for progression outcomes for full-time postgraduate students.
43. We are making this proposal because we consider that an adjustment at this level will enable us to take account of the impact that different student and course characteristics have had in the past on student outcomes.
44. We note that making this adjustment would mean that there would be three groups of students where we have observed an estimated difference of more than our proposed adjustment after controlling for all factors apart from provider, although we note that this analysis is not available for the progression indicator for non-UK-domiciled students. These are set out in Table A9.
45. We consider that, because of relatively low numbers of students and the small proportion within the overall population for this disaggregated level that these students represent, the possible impact of students in this group is not likely to be material to any one provider's performance. Where we identify providers with performance below our numerical thresholds, we expect that our proposed approach to consideration of context through our engagement and formal decision making will provide adequate opportunity to address instances where a provider has a disproportionately large number of students from these groups compared with other providers in the sector.

**Table A9: Student groups with estimated difference greater than proposed adjustment**

Group	Upper confidence threshold (% points)	Estimated difference (% points)	Lower confidence threshold (% points)	Population	% of total population
<b>UK-domiciled</b>					
Asian or Asian British	-4.3	-5.8	-7.1	1,630	1.8
Black or black British – other	-6.6	-7.5	-8.3	5,575	6.1

Social or communication impairment	-10.4	-13.3	-15.9	380	0.4
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### Continuation outcomes for part-time students

46. We propose a downward adjustment of **5 percentage points** when setting numerical thresholds for continuation outcomes for part-time postgraduate students.
47. We are making this proposal because we consider that an adjustment at this level will enable us to take account of the impact that different student and course characteristics have had in the past on student outcomes.
48. We note that making this adjustment would mean that there would be 10 groups of students where we have observed an estimated difference of more than our proposed adjustment after controlling for all factors apart from provider. These are set out in Table A10.
49. We consider that, because of relatively low numbers of students and the small proportion within the overall population for non-UK-domiciled students within this disaggregated level that these students represent, the possible impact of students in this group is not likely to be material to any one provider's performance. Of the differences identified above, the performance difference for the largest group of UK-domiciled students (students aged 51 or over) is estimated to lie between -5.5 and -6.6 percentage points. However, this group comprises only 8.6 per cent of the overall population for this indicator. We therefore consider it unlikely that the impact of students in this group will have a material effect on any one provider's performance.
50. We consider this to be a balanced judgment as the proportion of students in groups where the estimated difference may be above the downward adjustment recommended is higher than for other outcomes. We consider that it is still reasonable to make this downward adjustment and, where we identify providers with performance below our numerical thresholds, we expect that our proposed approach to consideration of context through our engagement and formal decision making will provide adequate opportunity to address instances where a provider has a disproportionately large number of students from these groups compared with other providers in the sector.

**Table A10: Student groups with estimated difference greater than proposed adjustment**

Group	Upper confidence threshold (% points)	Estimated difference (% points)	Lower confidence threshold (% points)	Population	% of total population
<b>UK-domiciled</b>					
Mixed – white and black African	-2.9	-5.4	-7.6	1,015	0.3
Asian or Asian British – Bangladeshi	-3.9	-5.7	-7.5	1,625	0.5

Asian or Asian British – Pakistani	-4.7	-5.7	-6.6	5,845	2.0
Black or black British – African	-7.9	-8.7	-9.4	12,330	4.1
Black or black British – Caribbean	-7.1	-8.3	-9.5	4,110	1.4
Black or black British – other	-8.1	-10.7	-13.1	890	0.3
51 years and over	-5.4	-6.0	-6.6	25,350	8.5
Mental health condition	-8.3	-9.5	-10.6	4,165	1.4
<b>Non-UK-domiciled</b>					
Mental health condition	-2.0	-8.4	-13.7	140	0.0
Sensory, medical or physical impairments	-4.5	-9.8	-14.4	200	0.1

### Completion outcomes for part-time students

51. We propose a downward adjustment of **5 percentage points** when setting numerical thresholds for completion outcomes for part-time postgraduate students.
52. We are making this proposal because we consider that an adjustment at this level will enable us to take account of the impact that different student and course characteristics have had in the past on student outcomes.
53. We note that making this adjustment would mean that there would be 10 groups of students where we have observed an estimated difference of more than our proposed adjustment after controlling for all factors apart from provider. These are set out in Table A11.
54. We consider that, because of relatively low numbers of students and the small proportion within the overall population for non-UK-domiciled students within this disaggregated level that these students represent, the possible impact of students in this group is not likely to be material to any one provider's performance. Of the differences identified above, the performance difference for the largest group of UK-domiciled students (students aged 51 and over) is estimated to lie between -9.1 and -10.3 percentage points. However, this group comprises only 8.7 per cent of the overall population for this indicator. We consider this performance difference and population size is sufficiently small that it is unlikely that the impact of students in this group will have a material effect on any one provider's performance, especially when data is further disaggregated by level of postgraduate study.
55. We consider this to be a balanced judgment as the proportion of students in groups where the estimated difference may be above the downward adjustment recommended is higher than for other outcomes. We consider that it is still reasonable to make this downward adjustment and,

where we identify providers with performance below our numerical thresholds, we expect that our proposed approach to consideration of context through our engagement and formal decision making will provide adequate opportunity to address instances where a provider has a disproportionately large number of students from these groups compared with other providers in the sector.

**Table A11: Student groups with estimated difference greater than proposed adjustment**

Group	Upper confidence threshold (% points)	Estimated difference (% points)	Lower confidence threshold (% points)	Population	% of total population
<b>UK-domiciled</b>					
Mixed – white and black African	-2.8	-5.6	-8.2	815	0.3
Asian or Asian British – Pakistani	-5.3	-6.4	-7.5	4,960	1.6
Asian or Asian British – Bangladeshi	-4.9	-7.0	-9.0	1,265	0.4
Black or black British – Caribbean	-6.3	-7.5	-8.8	4,235	1.3
Black or black British – other	-6.0	-8.7	-11.3	870	0.3
Multiple or other impairments	-3.9	-5.2	-6.5	4,000	1.3
Mental health condition	-6.4	-8.3	-10.0	1,630	0.5
51 years and over	-9.1	-9.7	-10.3	27,295	8.7
<b>Non-UK-domiciled</b>					
Cognitive or learning difficulties	-2.6	-8.4	-13.4	195	0.1
Mental health condition	-10.7	-20.5	-28.0	60	0.0

### Progression outcomes for part-time students

56. We propose a downward adjustment of **5 percentage points** when setting numerical thresholds for progression outcomes for part-time postgraduate students.

57. We are making this proposal because we consider that an adjustment at this level will enable us to take account of the impact that different student and course characteristics have had in the past on student outcomes.
58. We note that making this adjustment would mean that there would be five groups of students where we have observed an estimated difference of more than our proposed adjustment after controlling for all factors apart from provider, although we note that this analysis is not available for the progression indicator for non-UK-domiciled students. These are set out in Table A12.
59. We consider that, because of relatively low numbers of students and the small proportion within the overall population for this disaggregated level that these students represent, the possible impact of students in this group is not likely to be material to any one provider's performance. Where we identify providers with performance below our numerical thresholds, we expect that our proposed approach to consideration of context through our engagement and formal decision making will provide adequate opportunity to address instances where a provider has a disproportionately large number of students from these groups compared with other providers in the sector.

**Table A12: Student groups with estimated difference greater than proposed adjustment**

Group	Upper confidence threshold (% points)	Estimated difference (% points)	Lower confidence threshold (% points)	Population	% of total population
<b>UK-domiciled</b>					
Multiple or other impairments	-4.5	-5.9	-7.0	960	2.0
Mental health condition	-6.6	-8.2	-9.6	735	1.5
Social or communication impairment	-10.1	-14.4	-17.4	95	0.2
Black or black British – other	-4.3	-7.6	-9.8	140	0.3
Gypsy or traveller	16.6	-10.9	-16.0	<25	0.0

# Annex B: Proposed numerical threshold levels – detailed tables

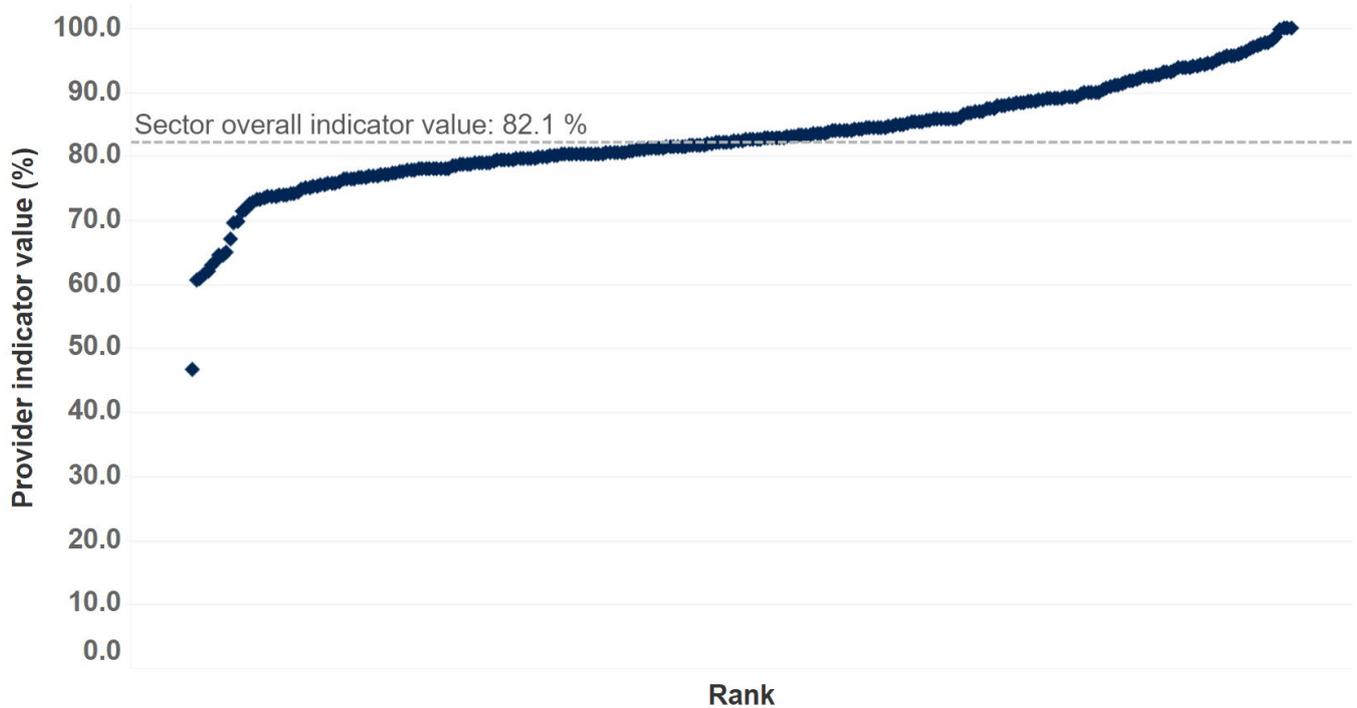
## Numerical thresholds for continuation: Full-time undergraduate

### 1. Numerical threshold for: Continuation

**Mode of study:** Full-time

**Level of study:** Other undergraduate

Figure B1: Sector overall rate = 82.1%



**Sector median (unweighted):** 82.4%

**Sector weighted median:** 81.7%

**Recommended starting point before adjustment:** 80%

#### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this measure, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).

- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this measure, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points (ppt) for full-time undergraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 75 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 75 per cent would result in 10.6 per cent of providers with point estimates below the numerical threshold. Thus, 8.7 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have further tested a 75 per cent threshold by considering the distribution of individual benchmarks. There would be five providers (2 per cent) with point estimates and individual benchmarks below the numerical threshold. We would consider the context of these providers when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for full-time undergraduate provision may not be sufficient in the case. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.
- We have also had regard to the effect that a numerical threshold set at 75 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified a risk that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for 'Ethnicity – Black' would be below the numerical threshold for 52 providers (47.7 per cent).
  - The point estimate for 'Ethnicity – Mixed' would be below the numerical threshold for 31 providers (43.1 per cent).

- The point estimate for ‘Disability type – Mental Health condition’ would be below the numerical threshold for 21 providers (41.2 per cent).

However, we have noted the relatively small populations for these student groups in comparison with the overall population for this indicator and have balanced this with our consideration of sector-wide contextual factors and our Exploring Student Outcomes analysis. We consider that the combined analysis we have undertaken suggests that the proposed downward adjustment for this indicator is likely to be sufficient for most providers. We would consider the context of any providers where the characteristics of their student population would be more likely to have a material impact on their compliance.

- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

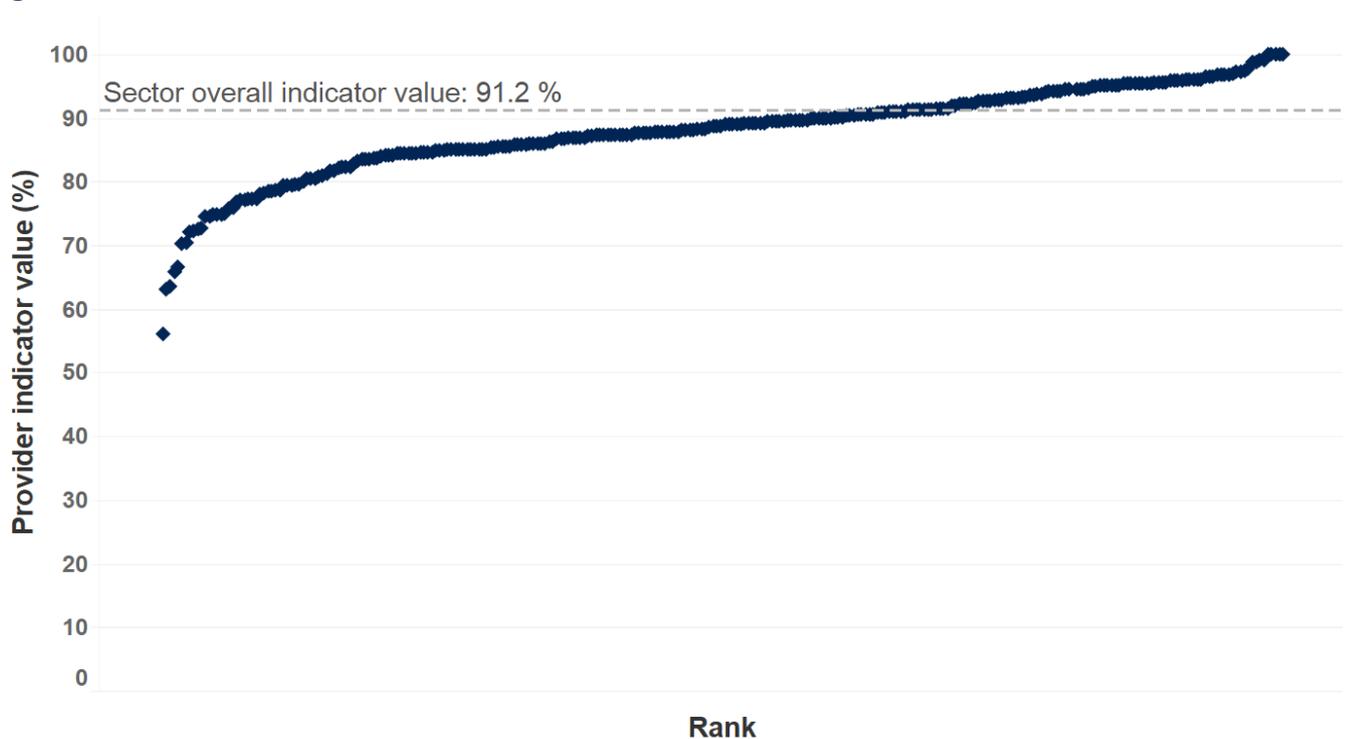
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below recommended threshold level</b>	31 (10.6%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	16,340 (8.7%)
<b>Recommended threshold level</b>	75%

## 2. Numerical threshold for: Continuation

**Mode of study:** Full-time

**Level of study:** First degree

**Figure B2: Sector overall rate = 91.2%**



**Sector median (unweighted):** 88.9%

**Sector weighted median:** 91.4%

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time undergraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 85 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 85 per cent would result in 25 per cent of providers with point estimates below the numerical threshold. The majority of these are smaller providers with fewer than 500 students. Thus, 6.9 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for 'Q1 ABCS (continuation)' would be below the numerical threshold for 147 providers (58 per cent). We would generally expect indicators for Q1 ABCS (continuation) to be lower than for other quintiles because the construction of the ABCS quintiles is such that students identified in Q1 would have the lowest historical performance across the sector.

- The point estimate for ‘first degree with foundation year’ would be below the numerical threshold for 69 providers (62 per cent).
- In addition, we have further tested an 85 per cent threshold by considering the distribution of individual benchmarks. There would be 45 providers (15 per cent) with point estimates and individual benchmarks below the numerical threshold. We noted that only one of these providers had a point estimate that was above its benchmark. We would consider the context of these providers when making any decision about compliance, but we nonetheless consider that this represents a sufficiently large proportion to suggest that the proposed downward adjustment for full-time undergraduate provision may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

We therefore considered an alternative numerical threshold of 80 per cent. We considered that a threshold at this level would be more appropriate.

- 12.5 per cent of providers have a point estimate below a numerical threshold of 80 per cent. 3.0 per cent of students would be studying at providers with point estimates below a numerical threshold set at 80 per cent. There is a risk that a numerical threshold of 80 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 80 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 20 per cent of students not continuing on their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not continuing with their courses and that a threshold below this level may not afford an appropriate level of protection to students.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below recommended threshold level</b>	36 (12.5%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	46,520 (3.0%)
<b>Recommended threshold level</b>	80%

### 3. Numerical threshold for: Continuation

**Mode of study:** Full-time

**Level of study:** Undergraduate with postgraduate components

**Figure B4: Sector overall rate = 96.2%**



**Sector median (unweighted):** 93.8%

**Sector weighted median:** 96.7%

**Recommended starting point before adjustment:** 90%

#### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Considers the starting point used for other numerical thresholds at postgraduate level as well as for high performing undergraduate indicators.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time undergraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in 7.5 per cent of providers with point estimates below the numerical threshold. Thus, 1.5 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have further tested an 85 per cent threshold by considering the distribution of individual benchmarks. There would be one provider with a point estimate and individual benchmark below the numerical threshold. We would consider the context of this provider when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for full-time undergraduate provision may not be sufficient for this level of study. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 85 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- We have had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for 'Q1 ABCS (continuation)' would be below the numerical threshold for 15 providers (23.4 per cent). We would generally expect indicators for Q1 ABCS (continuation) to be lower than for other quintiles because the construction of the ABCS quintiles is such that students identified in Q1 would have the lowest historical performance across the sector.
  - The point estimate for 'Age on entry – 31 years and over' would be below the numerical threshold for 12 providers (40 per cent).

We note that the population for these groups are relatively small compared with the overall population for this indicator. We have already considered these characteristics in our use of sector performance data and Exploring Student Outcomes analysis, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for postgraduate provision may not be sufficient for this level of study. However, we have set out our mechanisms for considering the context for any provider when making a decision about compliance. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

Having considered all factors, on balance we propose that a threshold at 85 per cent remains appropriate.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	7 (7.5%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	1,810 (1.5%)
<b>Recommended numerical threshold level</b>	85%

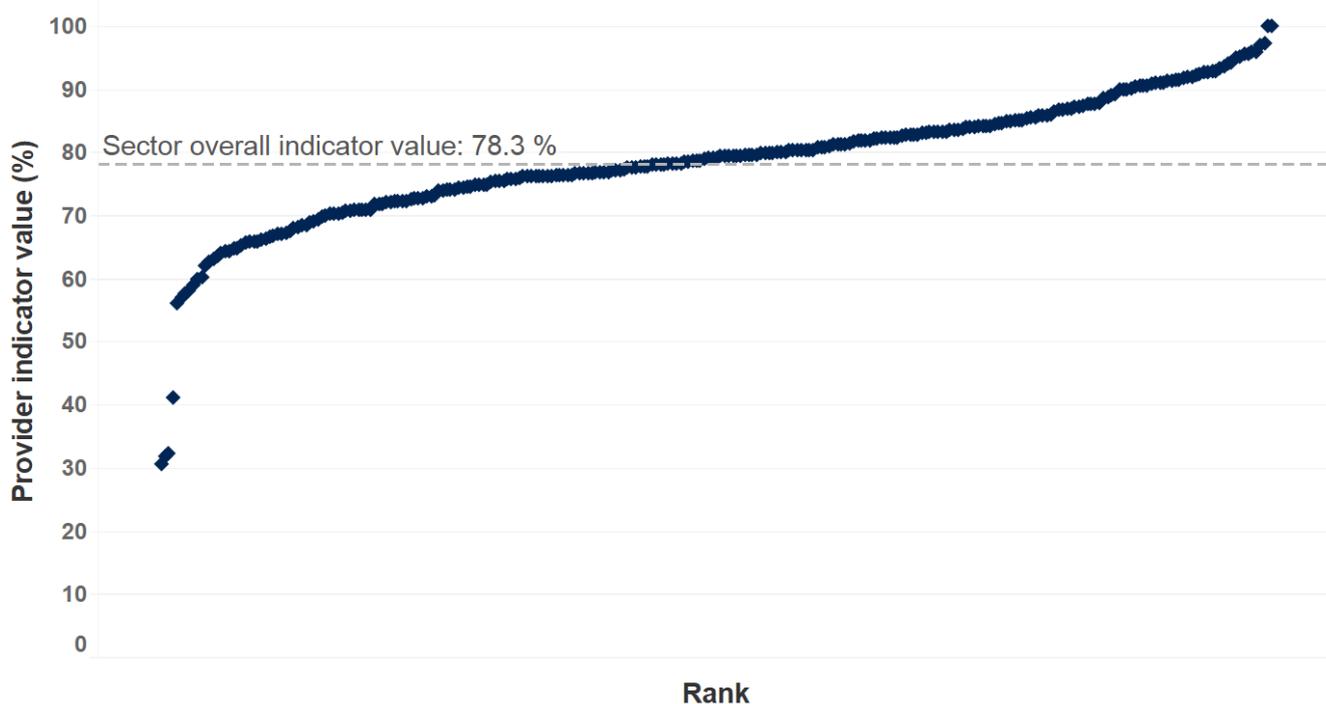
# Numerical thresholds for completion – cohort tracking: Full-time undergraduate

## 4. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Full-time

**Level of study:** Other undergraduate

**Figure B4: Sector overall rate = 78.3%**



**Sector median (unweighted):** 79.3%

**Sector weighted median:** 79.3%

**Recommended starting point before adjustment:** 75%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time undergraduate courses and have not identified any larger sector-wide performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 70 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 70 per cent would result in 14.8 per cent of providers with point estimates below the numerical threshold. Thus, 10.9 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have further tested a 70 per cent threshold by considering the distribution of individual benchmarks. There would be eight providers (3 per cent) with point estimates and individual benchmarks below the numerical threshold. We would consider the context of these providers when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for full-time undergraduate provision may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 70 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- We have had regard to the effect that a numerical threshold set at 70 per cent would have on the proportion of providers where point estimates for split indicators would be below the

numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Age on entry – 21 to 30 years’ would be below the numerical threshold for 65 providers (25 per cent).
- The point estimate for ‘IMD quintile – Q1 or Q2’ would be below the numerical threshold for 58 providers (22.9 per cent).
- The point estimate for ‘Ethnicity – other’ (to include ethnicities other than white) would be below the numerical threshold for 56 providers (28.7 per cent).
- The point estimate for ‘Eligible for free school meals’ would be below the numerical threshold for 51 providers (32.9 per cent).

We therefore considered an alternative numerical threshold of 65 per cent. We considered that a threshold at this level would be more appropriate.

- 7.2 per cent of providers have a point estimate below a numerical threshold of 65 per cent. 3.9 per cent of students would be studying at providers with point estimates below a numerical threshold set at 65 per cent. There is a risk that a numerical threshold of 65 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 65 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 35 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

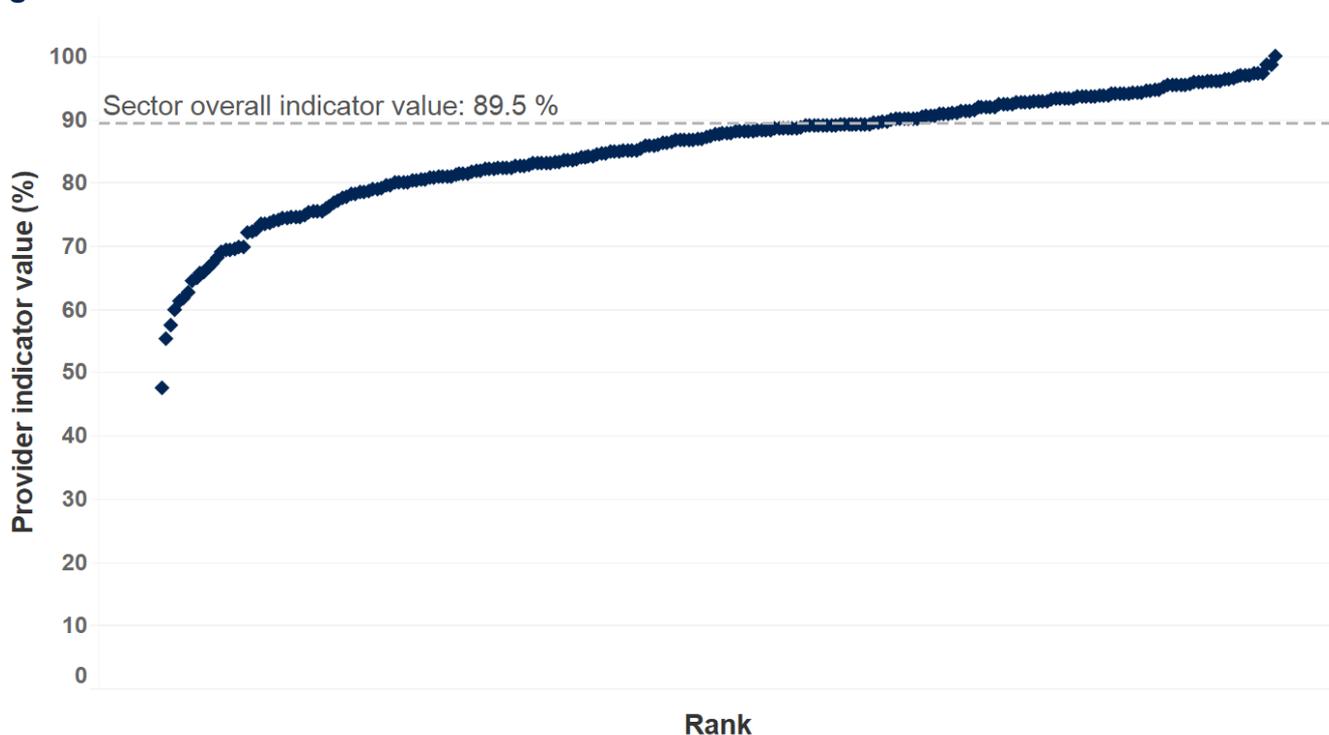
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	20 (7.2%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	7,730 (3.9%)
<b>Recommended numerical threshold level</b>	65%

## 5. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Full-time

**Level of study:** First degree

**Figure B5: Sector overall rate = 89.5%**



**Sector median (unweighted): 87.8%**

**Sector weighted median: 89.6 %**

**Recommended starting point before adjustment: 85%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time undergraduate courses and have identified that students reporting a mental health disability have completion outcomes 7.5 percentage points lower than the overall weighted sector median (82.1 per cent compared with 89.6 per cent). Our Exploring Student Outcomes analysis (see Annex A) further suggests that the difference in performance, after adjustment for all factors other than provider, could be between 7.7 and 8.4 percentage points when compared with students who have not reported a disability (noting that this analysis includes all full-time undergraduate students domiciled in the UK). The proportion of full-time first degree students reporting a mental health condition is 1.5 per cent of the overall population for this indicator.

Analysis suggests a numerical threshold of 80 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have further tested an 80 per cent threshold by considering the distribution of individual benchmarks. There would be three providers (1 per cent) with point estimates and individual benchmarks below the numerical threshold. We would consider the context of these providers when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for full-time undergraduate provision may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 80 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 80 per cent would result in 20.8 per cent of providers with point estimates below the numerical threshold. Thus, 3.8 per cent of students

would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.

- We have also had regard to the effect that a numerical threshold set at 80 per cent would have the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 56 providers (32.6 per cent).
  - The point estimate of ‘IMD quintile – Q1 or Q2’ would be below the numerical threshold for 68 providers (30.9 per cent)
  - The point estimate of ‘Disability – Mental Health Condition’ would be below the numerical threshold for 52 providers (44.8 per cent)
  - The point estimate for ‘first degree with foundation year’ would be below the numerical threshold for 62 providers (70.5 per cent).

We therefore considered an alternative numerical threshold of 75 per cent. We considered that a threshold at this level would be more appropriate.

- 13.1 per cent of providers have a point estimate below a numerical threshold of 75 per cent. 2.4 per cent of students would be studying at providers with point estimates below a numerical threshold set at 75 per cent. We consider that this is a more proportionate threshold which has regard to our general duty to ensure our regulatory focus is targeted only at cases where action is needed.
- There is, however, a risk that a numerical threshold of 75 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 75 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 25 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

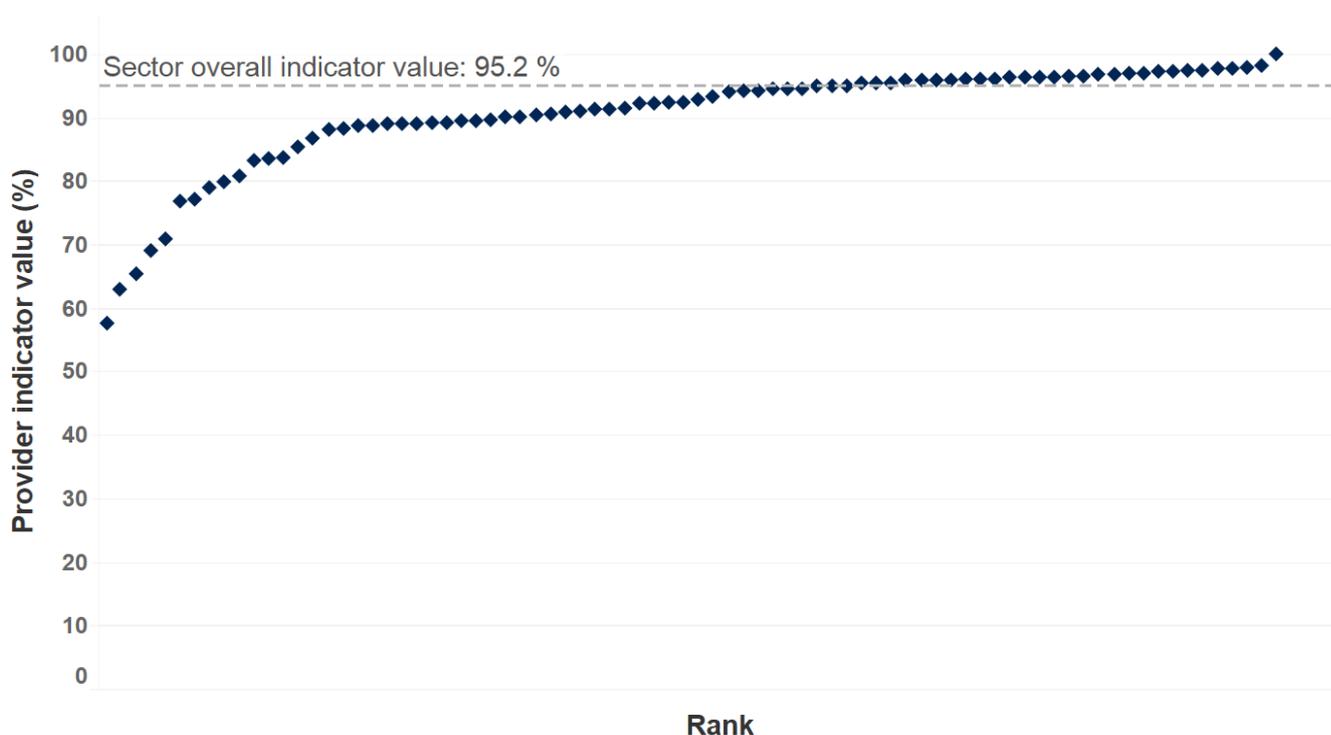
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below recommended threshold level</b>	34 (13.1%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	33,520 (2.4%)
<b>Recommended threshold level threshold</b>	75%

## 6. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Full-time

**Level of study:** Undergraduate with postgraduate components

**Figure B6: Sector overall rate = 95.2%**



**Sector median (unweighted):** 92.9%

**Sector weighted median:** 96.0 %

**Recommended starting point before adjustment:** 90%

### Reason for recommendation

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as set out in our policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Consistent with recommended starting point for other indicators for this mode and level of study.
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time undergraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in 16.3 per cent of providers with point estimates below the numerical threshold. The majority of these are smaller providers with fewer than 500 students. Thus, 1.8 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 13 providers (48.1 per cent).
  - The point estimate for ‘Disability type – mental health condition’ would be below the numerical threshold for 10 providers (58.8 per cent).

We note that the population for these groups are relatively small compared with the overall population for this indicator. We have already considered these characteristics in our use of sector performance data and Exploring Student Outcomes analysis, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for full-time undergraduate provision may not be sufficient for this mode and level of study. However, we have set out our mechanisms for considering the context for any provider when making a decision about compliance. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

- We have further tested an 85 per cent threshold by considering the distribution of individual benchmarks. There would be three providers (3.8 per cent) with point estimates and individual benchmarks below the numerical threshold. We would consider the context of these providers

when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for full-time undergraduate provision may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.
- We recognise that the proposed numerical threshold for this measure of completion (cohort tracking indicator) is not consistent with the proposed level for the compound measure of completion. The different methods for constructing these measures have resulted in different outcomes for sector performance, leading us to recommend different numerical threshold levels. We think it is reasonable to set out the effects on thresholds of both indicators for the purpose of consultation.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	13 (16.3%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	1,990 (1.8%)
<b>Recommended numerical threshold level</b>	85%

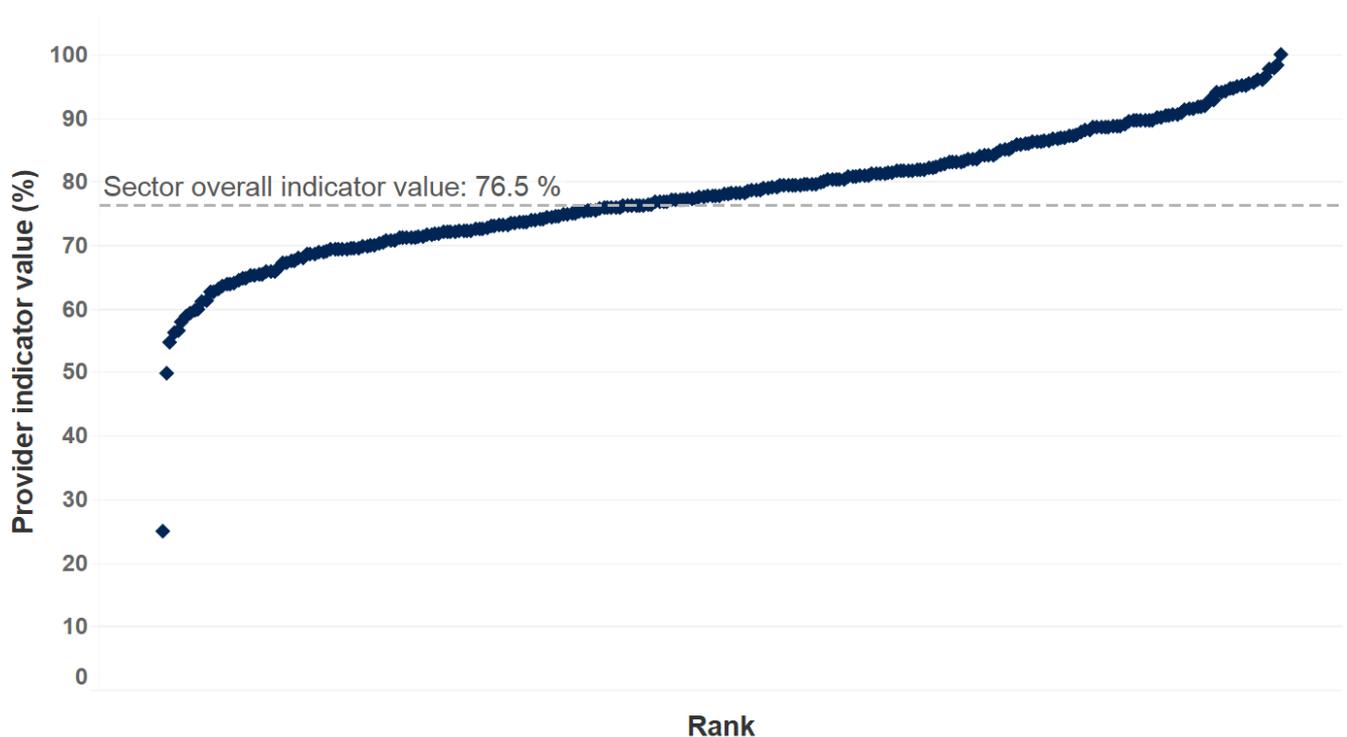
# Numerical thresholds for completion – compound indicator: Full-time undergraduate

## 7. Numerical threshold for: Completion – compound indicator

**Mode of study:** Full-time

**Level of study:** Other undergraduate

**Figure B7: Sector overall rate = 76.5%**



**Sector median (unweighted): 78.1%**

**Sector weighted median: 77.0%**

**Recommended starting point before adjustment: 75%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time undergraduate courses and for most factors have not identified any larger sector-wide performance gaps that indicate that a larger adjustment would be recommended for this indicator.
- However, our analysis suggests there is some evidence of a larger performance gap for students reporting a mental health condition. The weighted median for these students is 68.2 per cent, compared with the overall sector weighted median of 77 per cent. Our Exploring Student Outcomes analysis (see Annex A) suggests that, when controlling for all factors except provider for all UK-domiciled full-time undergraduate students, there may be a difference of between 7.7 and 8.4 percentage points compared with students who do not report a disability, slightly larger than the 5 percentage points proposed downward adjustment. However, we note that the number of students reporting a mental health condition represents less than 1 per cent of the overall population for this indicator, limiting the likely impact on an individual provider's performance.
- There is also some evidence suggesting a larger performance gap for black students. The weighted median for these students is 68.2 per cent, compared with the overall sector median of 77 per cent. Our Exploring Student Outcomes analysis (see Annex A) suggests, however, that the effect of this characteristic is reduced when controlling for all factors except provider for all full-time UK-domiciled undergraduate students when compared with white students, with the largest estimated gap being within the 5 percentage points proposed downward adjustment for full-time undergraduate courses.

Analysis suggests a numerical threshold of 70 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have further tested a 70 per cent threshold by considering the distribution of individual benchmarks. There would be eight providers (3 per cent) with point estimates and individual benchmarks below the numerical threshold. We would consider the context of these providers when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for full-time undergraduate courses may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.

- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 70 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 70 per cent would result in 18.6 per cent of providers with point estimates below the numerical threshold. Thus, 22.1 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 70 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘Age on entry – 21 to 30 years’ would be below the numerical threshold for 65 providers (26.9 per cent).
  - The point estimate for ‘IMD quintile – Q1 or Q2’ would be below the numerical threshold for 67 providers (27.6 per cent).
  - The point estimate for ‘Ethnicity – Other’ (to include ethnicities other than white) would be below the numerical threshold for 76 providers (43.2 per cent).
  - The point estimate for ‘Disability reported’ would be below the numerical threshold for 57 providers (29.1 per cent).
  - The point estimate for ‘Eligible for free school meals’ would be below the numerical threshold for 83 providers (54.6 per cent).

We therefore considered an alternative numerical threshold of 65 per cent. We considered that a threshold at this level would be more appropriate.

- 7.9 per cent of providers have a point estimate below a numerical threshold of 65 per cent. 11.9 per cent of students would be studying at providers with point estimates below a numerical threshold set at 65 per cent. There is a risk that a numerical threshold of 65 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 65 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.

- The OfS's view is that 35 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

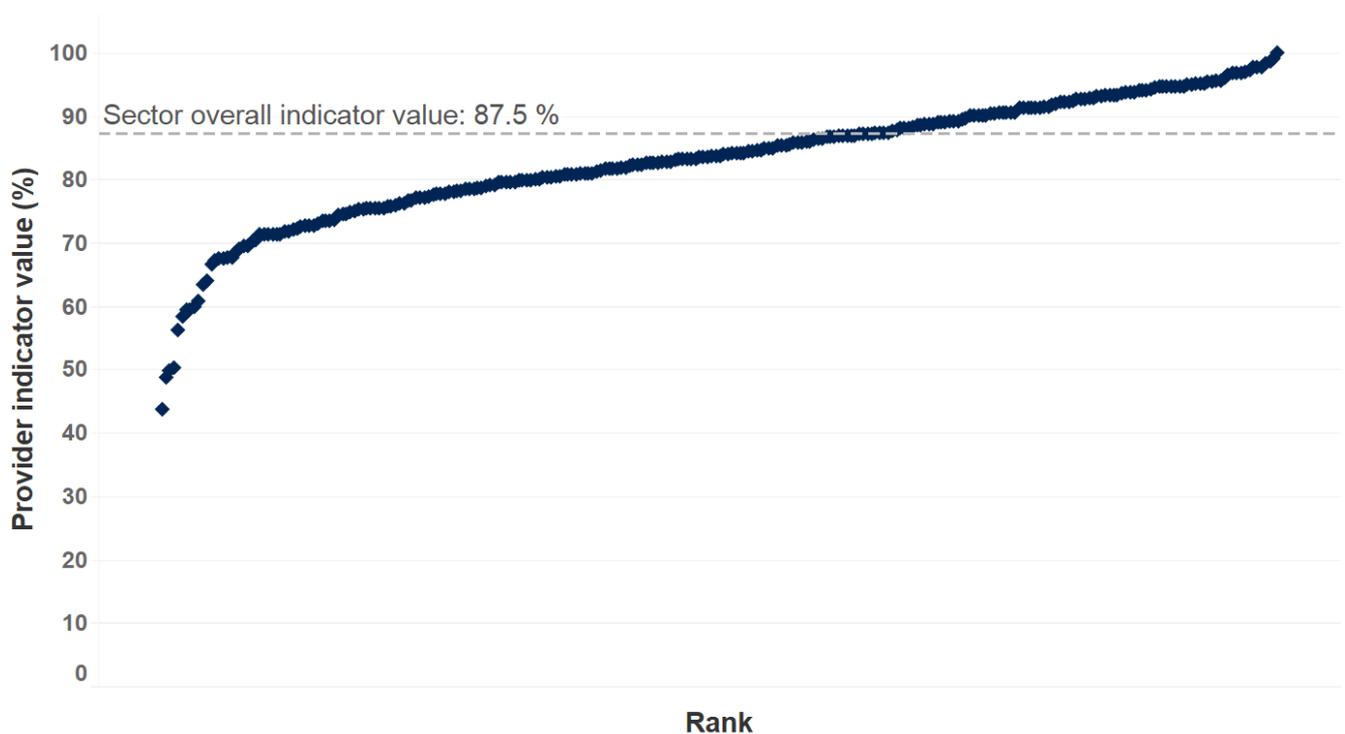
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	22 (7.9%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	22,020 (11.9%)
<b>Recommended numerical threshold level</b>	65%

## 8. Numerical threshold for: Completion – compound indicator

**Mode of study:** Full-time

**Level of study:** First degree

**Figure B8: Sector overall rate = 87.5%**



**Sector median (unweighted): 83.9%**

**Sector weighted median: 87.8%**

**Recommended starting point before adjustment: 85%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time undergraduate courses and for most factors have not identified any larger sector-wide performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 80 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have further tested an 80 per cent threshold by considering the distribution of individual benchmarks. There would be eight providers (3 per cent) with point estimates and individual benchmarks below the numerical threshold. We would consider the context of these providers when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for full-time undergraduate provision may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 80 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- The effect of setting the numerical threshold at 80 per cent would result in 32.6 per cent of providers with point estimates below the numerical threshold. Thus, 11.0 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.

- We have also had regard to the effect that a numerical threshold set at 80 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 75 providers (41.0 per cent).
  - The point estimate of ‘IMD quintile – Q1 or Q2’ would be below the numerical threshold for 104 providers (43.5 per cent)
  - The point estimate of ‘Disability – Mental Health Condition’ would be below the numerical threshold for 64 providers (48.9 per cent)
  - The point estimate of ‘Ethnicity – Black’ would be below the numerical threshold for 61 providers (43.0 per cent)
  - The point estimate for ‘first degree with foundation year’ would be below the numerical threshold for 74 providers (75.5 per cent).

We therefore considered an alternative numerical threshold of 75 per cent. We considered that a threshold at this level would be more appropriate.

- 16.8 per cent of providers have a point estimate below a numerical threshold of 75 per cent. 3.3 per cent of students would be studying at providers with point estimates below a numerical threshold set at 75 per cent. We consider that this is a more proportionate threshold which has regard to our general duty to ensure our regulatory focus is targeted only at cases where action is needed.
- There would be no providers with individual benchmarks below the numerical threshold.
- There is, however, a risk that a numerical threshold of 75 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 75 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 25 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

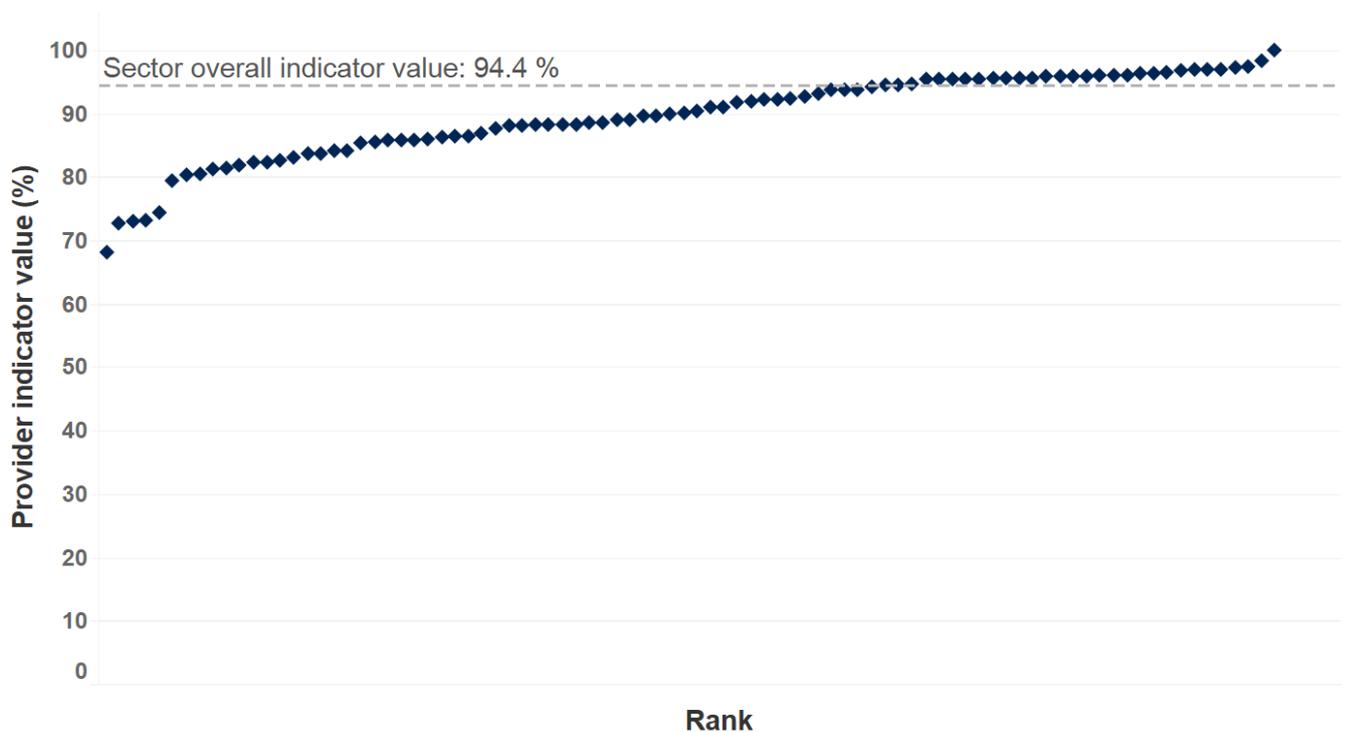
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below recommended numerical threshold level</b>	46 (16.8%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	51,310 (3.3%)
<b>Recommended numerical threshold level</b>	75%

## 9. Numerical threshold for: Completion – compound indicator

**Mode of study:** Full-time

**Level of study:** Undergraduate with postgraduate components

**Figure B5: Sector overall rate = 94.4%**



**Sector median (unweighted):** 90.3%

**Sector weighted median:** 95.9%

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as set out in our policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Consistent with recommended starting point for other indicators for this mode and level of study.
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time undergraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have further tested an 85 per cent threshold by considering the distribution of individual benchmarks. There would be five providers (6 per cent) with point estimates and individual benchmarks below the numerical threshold. We would consider the context of these providers when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for full-time undergraduate provision may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 85 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 85 per cent would result in 21.6 per cent of providers with point estimates below the numerical threshold. Thus, 5.2 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the

numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 10 providers (43.5 per cent).

We therefore considered an alternative numerical threshold of 80 per cent. We considered that a threshold at this level would be more appropriate.

- 6.8 per cent of providers have a point estimate below a numerical threshold of 80 per cent. 1.7 per cent of students would be studying at providers with point estimates below a numerical threshold set at 80 per cent. There is a risk that a numerical threshold of 80 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 80 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 20 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing with their courses and that a threshold below this level may not afford an appropriate level of protection to students.
- We recognise that the proposed numerical threshold for this measure of completion (composite indicator) is not consistent with the proposed level for the cohort tracking measure of completion. The different methods for constructing these measures have resulted in different outcomes for sector performance, leading us to recommend different numerical threshold levels. We think it is reasonable to set out the effects on thresholds of both indicators for the purpose of consultation.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	6 (6.8%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	2,090 (1.7%)
<b>Recommended numerical threshold level</b>	80%

# Numerical thresholds for progression: Full-time undergraduate

## 10. Numerical threshold for: Progression

**Mode of study:** Full-time

**Level of study:** Other undergraduate

**Figure B10: Sector overall rate = 59.4%**



**Sector median (unweighted):** 58.0%

**Sector weighted median:** 57.2%

**Recommended starting point before adjustment:** 55%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time undergraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator. The overall population for this indicator is smaller than for others, with 25,280 students represented, which limits our statistical confidence in making greater adjustments based on small numbers of students.
- We have, however, noted that some subject areas have weighted median rates that are below the proposed numerical threshold, namely:
  - Agriculture (35.8 per cent)
  - Business and Management (40.7 per cent)
  - Politics (weighted median figure suppressed based on low number of providers)

The total student population for these subject areas accounts for 17 per cent of the student population for this indicator.

- We propose to include subject of study as a factor in benchmarking data, to take account of the impact that differences in subject area may have on a provider's performance, depending on the subjects it offers. Where there are identified sector-wide differences, we also propose to include a provider's subject offering in contextual considerations of their individual performance where a provider specialises in a particular subject.

Analysis suggests a numerical threshold of 50 per cent may have been reasonable because:

- It would reflect the average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points. We have identified some observable difference as a result of subject area, but we consider this adjustment is sufficient to take account of the likely impact of that difference on an individual provider's performance for a provider offering a range of subjects. We have noted the mechanisms we will use to consider the context of individual providers with a more specialised subject offering.
- We have further tested a 50 per cent threshold by considering the distribution of individual benchmarks. There would be 9 providers (11 per cent) with point estimates and individual benchmarks below the numerical threshold. We note that, of these providers, only three are performing above individual benchmarks. We would consider the context of these providers when making any decision about compliance, and we consider that this does not represent a

sufficiently large proportion to suggest that the proposed downward adjustment for undergraduate provision may not be sufficient for other undergraduate provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- We have noted that the use of survey data for this indicator results in a greater degree of statistical uncertainty around the data for individual providers, especially for smaller providers. We have considered mechanisms for taking account of greater statistical uncertainty in the data in Proposal 6 of the consultation, and do not propose to make additional adjustments to the numerical threshold to take further account of this at a sector level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 50 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 50 per cent would result in 27.9 per cent of providers with point estimates below the numerical threshold. Thus, 31.7 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 50 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘Age on entry – under 21 years’ would be below the numerical threshold for 69 providers (46.6 per cent).
  - The point estimate for ‘Ethnicity – Asian’ would be below the numerical threshold for 18 providers (60.0 per cent).
  - The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for 12 providers (46.2 per cent).
  - The point estimate for ‘Disability type – cognitive or learning difficulties’ would be below the numerical threshold for seven providers (38.9 per cent).
  - The point estimate for ‘Eligibility for free school meals – eligible’ would be below the numerical threshold for nine providers (69.2 per cent).

- The point estimate for ‘Other undergraduate level – level 4’ would be below the numerical threshold for 22 providers (44.9 per cent).

We therefore considered an alternative numerical threshold of 45 per cent. We considered that a threshold at this level would be more appropriate.

- 12.2 per cent of providers have a point estimate below a numerical threshold of 45 per cent. 12.7 per cent of students would be studying at providers with point estimates below a numerical threshold set at 45 per cent. There is a risk that a numerical threshold of 45 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 45 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 55 per cent of students not progressing to positive outcomes from their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not progressing to positive outcomes and that a threshold below this level may not afford an appropriate level of protection to students.

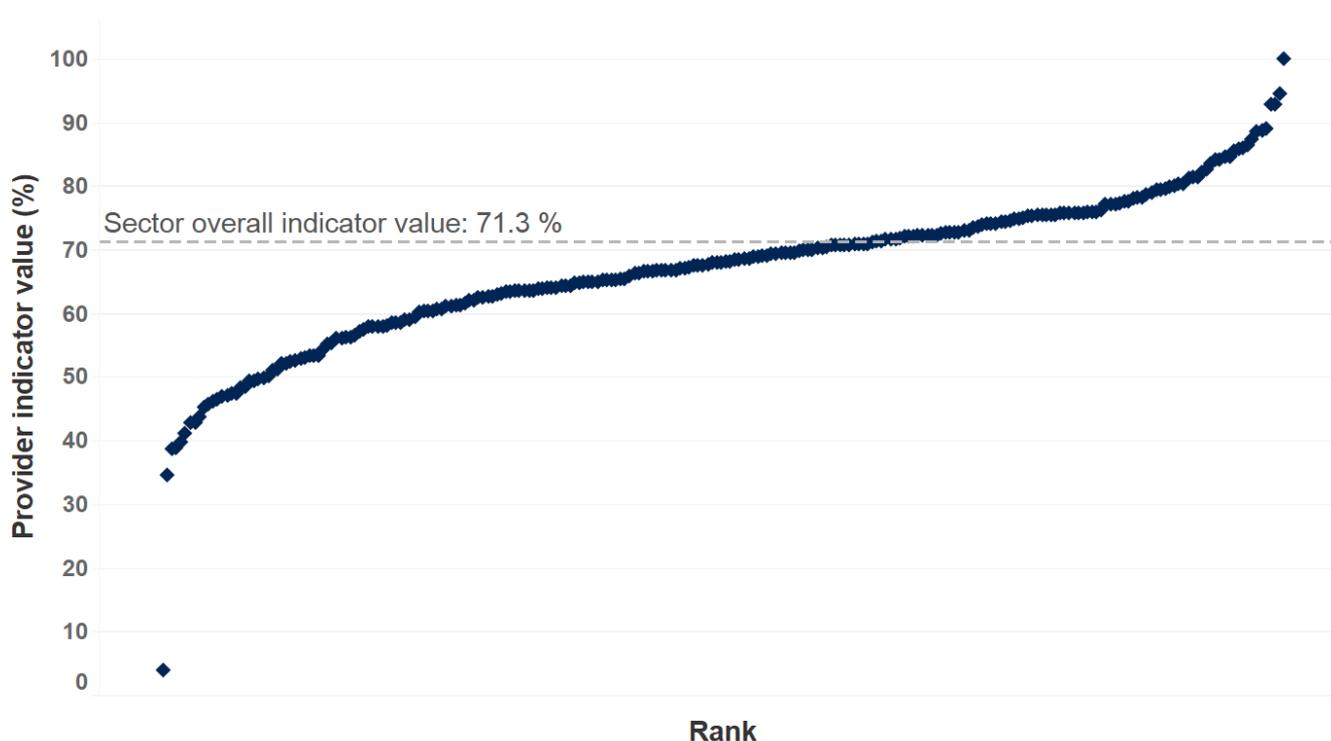
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	27 (12.2%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	3,200 (12.7%)
<b>Recommended numerical threshold level</b>	45%

## 11. Numerical threshold for: Progression

**Mode of study:** Full-time

**Level of study:** First degree

**Figure B11: Sector overall rate = 71.3%**



**Sector median (unweighted):** 68.1%

**Sector weighted median:** 71.9%

**Recommended starting point before adjustment:** 70%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time undergraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.
- We have, however, noted that some subject areas have weighted median rates that are below the proposed numerical threshold, namely:
  - History and Archaeology (67.9 per cent)
  - Agriculture (57.2 per cent)
  - Media, journalism and communications (64.1 per cent)
  - Psychology (59.9 per cent)
  - Sociology, social policy and anthropology (56.8 per cent)

The total student population for these subject areas account for 17.0 per cent of the student population for this indicator.

- We propose to include subject of study as a factor in benchmarking data, to take account of the impact that differences in subject area may have on a provider's performance, depending on the subjects it offers. Where there are identified sector-wide difference, we also propose to include a provider's subject offering in contextual considerations of their individual performance where a provider specialises in a particular subject.

Analysis suggests a numerical threshold of 65 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have noted that the use of survey data for this indicator results in a greater degree of statistical uncertainty around the data for individual providers, especially for smaller providers. We have considered mechanisms for taking account of greater statistical uncertainty in the data in Proposal 6 of the consultation, and do not propose to make additional adjustments to the numerical threshold to take further account of this at a sector level.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.

- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 65 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 65 per cent would result in 38 per cent of providers with point estimates below the numerical threshold. Thus, 11.4 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 65 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘Age on entry – under 21 years’ would be below the numerical threshold for 78 providers (42.9 per cent).
  - The point estimate of ‘IMD quintile – Q1 or Q2’ would be below the numerical threshold for 76 providers (42.9 per cent).
  - The point estimate of ‘Ethnicity – Asian’ would be below the numerical threshold for 49 providers (45.4 per cent).
  - The point estimate of ‘Disability – Social or communication impairment’ would be below the numerical threshold for 20 providers (69.0 per cent)
- In addition, we have further tested a 65 per cent threshold by considering the distribution of individual benchmarks. There would be 18 providers (10.7 per cent) with point estimates and individual benchmarks below the numerical threshold. We noted that only one of these providers had a point estimate that was above its benchmark. We would consider the context of these providers when making any decision about compliance, however we nonetheless consider that this represents a sufficiently large proportion to suggest that the proposed downward adjustment for undergraduate provision may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

We therefore considered an alternative numerical threshold of 60 per cent. We considered that a threshold at this level would be more appropriate.

- 22.8 per cent of providers have a point estimate below a numerical threshold of 60 per cent. 2.3 per cent of students would be studying at providers with point estimates below a numerical

threshold set at 60 per cent. There is a risk that a numerical threshold of 60 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 60 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.

- There are 5 providers with an individual benchmark below a numerical threshold of 60 per cent. We consider that this represents a sufficiently small proportion to suggest that this further adjustment is sufficient for first degree provision
- The OfS’s view is that 40 per cent of students not progressing to positive outcomes from their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not progressing to positive outcomes and that a threshold below this level may not afford an appropriate level of protection to students.

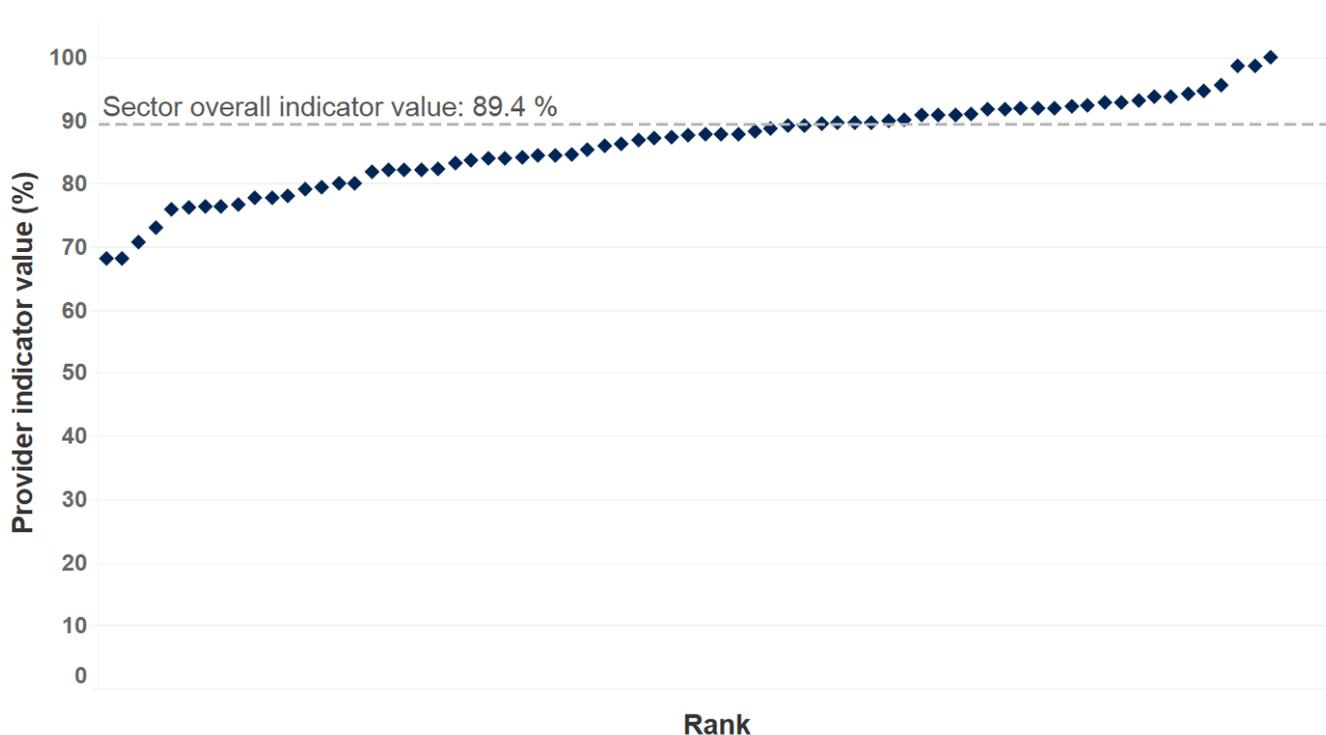
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	56 (22.8%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	6,850 (2.3%)
<b>Recommended numerical threshold level</b>	60%

## 12. Numerical threshold for: Progression

**Mode of study:** Full-time

**Level of study:** Undergraduate with postgraduate components

**Figure B12: Sector overall rate = 89.4%**



**Sector median (unweighted): 87.7%**

**Sector weighted median: 89.9%**

**Recommended starting point before adjustment: 85%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Consistent with recommended starting point for other indicators for this mode and level of study.
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time undergraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.
- We have, however, noted that some subject areas have weighted median rates that are below the proposed numerical threshold, namely:
  - Creative arts and design (weighted median figure suppressed based on low number of providers)
  - Languages and area studies (weighted median figure suppressed based on low number of providers)
  - Politics (weighted median figure suppressed based on low number of providers)
  - Psychology (66.2 per cent)

The total student population for these subject areas account for less than 1 per cent of the student population for this indicator.

- We propose to include subject of study as a factor in benchmarking data, to take account of the impact that differences in subject area may have on a provider's performance, depending on the subjects it offers. Where there are identified sector-wide differences, we also propose to include a provider's subject offering in contextual considerations of their individual performance where a provider specialises in a particular subject.

Analysis suggests a numerical threshold of 80 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 80 per cent would result in 19.7 per cent of providers with point estimates below the numerical threshold. The majority of these are smaller providers with fewer than 500 students. Thus, 4.6 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.

- We have had regard to the effect that a numerical threshold set at 80 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis has not identified examples where a disproportionately large number of providers would have split indicators where this was the case.
- We have further tested an 80 per cent threshold by considering the distribution of individual benchmarks. There would be five providers (7 per cent) with point estimates and individual benchmarks below the numerical threshold. We would consider the context of these providers when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for full-time undergraduate provision may not be sufficient for this mode and level of study. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.
- We have also noted that the use of survey data for this indicator results in a greater degree of statistical uncertainty around the data for individual providers, especially for smaller providers. We have considered mechanisms for taking account of greater statistical uncertainty in the data in Proposal 6 of the consultation, and do not propose to make additional adjustments to the numerical threshold to take further account of this at a sector level.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	14 (19.7%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	1,330 (4.6%)
<b>Recommended numerical threshold level</b>	80%

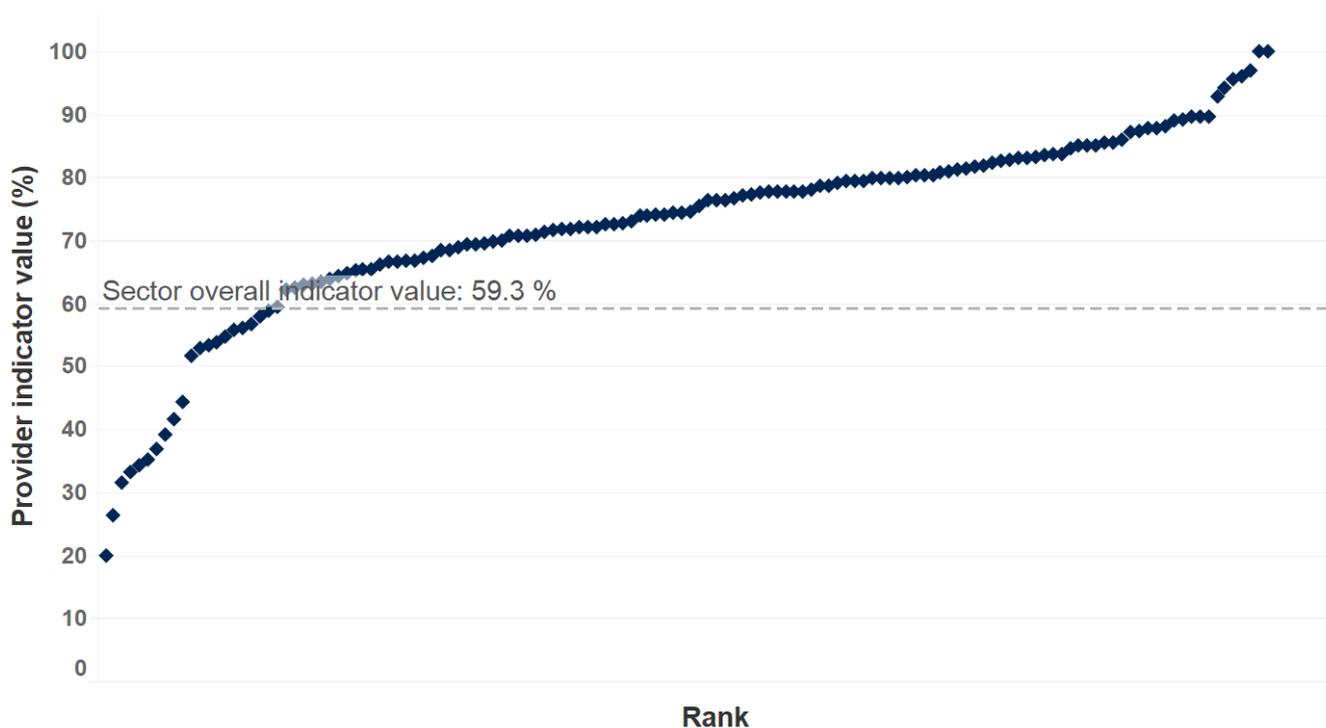
# Numerical thresholds for continuation: Part-time undergraduate

## 13. Numerical threshold for: Continuation

**Mode of study:** Part-time

**Level of study:** First degree

**Figure B13: Sector overall rate = 59.3%**



**Sector median (unweighted):** 74.6%

**Sector weighted median:** 54.7%

**Recommended starting point before adjustment:** 70%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- For this indicator, there is one very large provider that accounts for just over two-thirds of all part-time first degree students. The sector overall rate performance without this provider is 69.4 per cent, and we have given weight to this level when recommending a starting point as we think that including data from this provider would result in a starting point that is not representative of general performance in the sector.

- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time undergraduate courses and have identified some observable difference in sector-wide contextual factors with larger performance differences that indicate that a larger adjustment may be recommended for this indicator. We have considered the unweighted sector data for this indicator to reduce the influence of a single large provider on our recommended adjustments.
- We have noted that there is some indication that black students have lower rates of continuation compared with other students. The unweighted median continuation for these students is 64.9 per cent, greater than 5 percentage points below the recommended starting point. Our Exploring Student Outcomes analysis (see Annex A) suggests that there are different performance gaps for the three groups of Black students we use. The largest gaps after controlling for all factors except provider are for 'Black or black British - other' (between 8.6 and 3.7 percentage points). However, the unweighted median remains above the proposed numerical threshold for this indicator, and we note that these students represent less than 5 per cent of students in this indicator, which limits the likely impact on an individual provider's performance.

Analysis suggests a numerical threshold of 60 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement. Only making the proposed downward adjustment for part-time undergraduate provision of 5 percentage points would result in a numerical threshold of 65 per cent. This may not reflect our general policy position that performance at, or close to, the sector average is unlikely to be identified as requiring improvement, as 65 per cent is too close to sector average performance.
- The effect of setting the numerical threshold at 60 per cent would result in 15.4 per cent of providers with point estimates below the numerical threshold. The majority of these are smaller providers with fewer than 500 students. However, although the majority of these are smaller providers with fewer than 500 students, the large provider in this indicator is also below this threshold, resulting in 73.7 per cent of students being covered by indicators below the recommended threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.

- Consideration of sector performance through Exploring Student Outcomes shows some observable difference as a result of particular student characteristics, but this adjustment is sufficient to take account of the likely impact of that difference on an individual provider's performance. There is a risk using the proposed downward adjustment for part-time undergraduate provision to propose a numerical threshold of 65 per cent would not be sufficient to take account of observable differences in performance.
- We have also had regard to the effect that a numerical threshold set at 60 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. We have noted that the point estimate for 'Q1 ABCS (continuation)' would be below the numerical threshold for 11 providers (35.5 per cent). We would generally expect indicators for Q1 ABCS (continuation) to be lower than for other quintiles because the construction of the ABCS quintiles is such that students identified in Q1 would have the lowest historical performance across the sector. For other split indicators where there appears to be a larger proportion of indicators below a numerical threshold of 60 per cent, we have noted that these indicators have a low number of data points (fewer than five), and we do not consider that there is sufficient data to demonstrate disproportionality for this indicator.
- We have further tested a 60 per cent threshold by considering the distribution of individual benchmarks. There would be three providers (2 per cent) with point estimates and individual benchmarks below the numerical threshold. We would consider the context of these providers when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that this additional downward adjustment for undergraduate provision may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

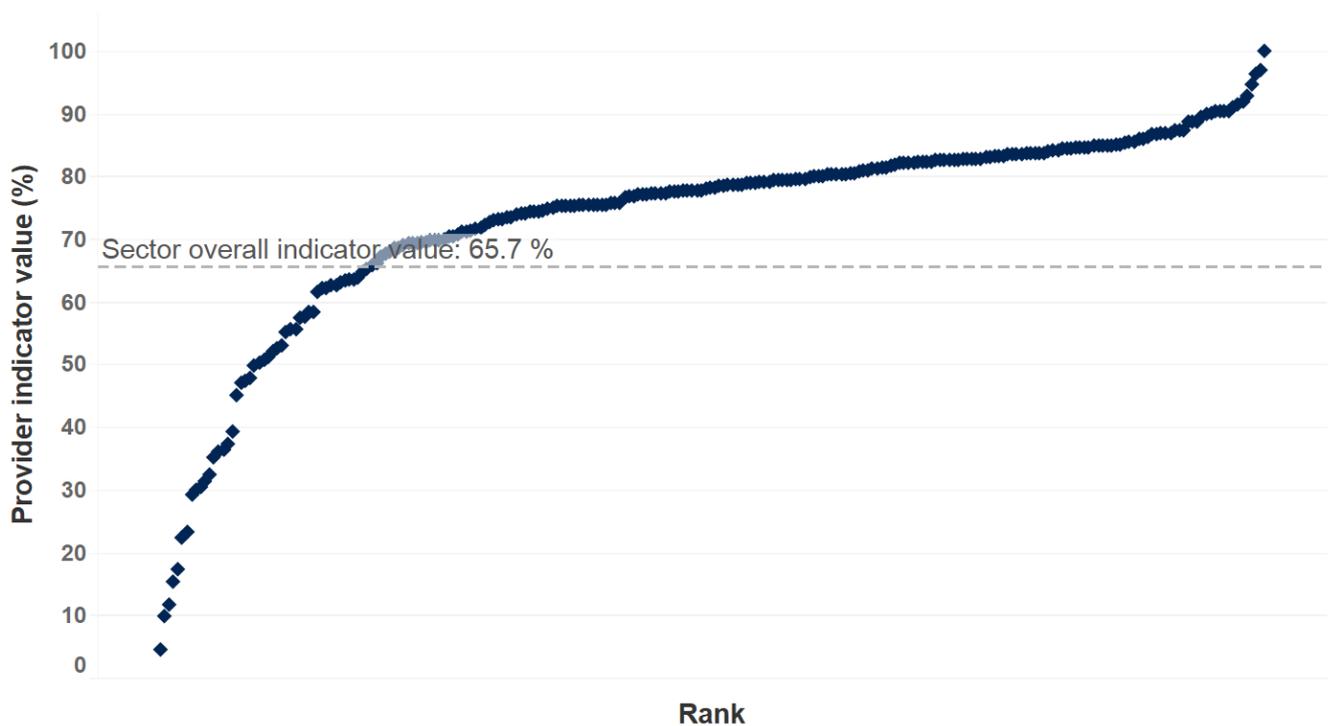
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below recommended numerical threshold level</b>	21 (15.4%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	110,450 (73.7%)
<b>Recommended numerical threshold level</b>	60%

## 14. Numerical threshold for: Continuation

**Mode of study:** Part-time

**Level of study:** Other undergraduate

**Figure B14: Sector overall rate = 65.7%**



**Sector median (unweighted):** 78.4%

**Sector weighted median:** 74.7%

**Recommended starting point before adjustment:** 70%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- We have taken account of the weighted median level for this indicator because of performance in the unweighted lower quartile by some larger providers in this indicator. We have given weight to this level as we think that this results in a starting point that is more representative of general performance in the sector.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).

- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time undergraduate courses and have identified that most sector-wide contextual factors do not demonstrate larger performance differences that indicate that a larger adjustment would be recommended for this indicator.
- However, there is some evidence of a larger performance difference based on ethnicity. The weighted median performance for Black students is 65.0 per cent and for mixed ethnicity students is 61.7 per cent. The difference between both and sector weighted median are greater than the proposed downward adjustment of 5 percentage points for part-time undergraduate provision. Our Exploring Student Outcomes analysis (see Annex A) suggests that the largest performance difference may be larger than the proposed downward adjustment of 5 percentage points when compared with white students, although this is based on all undergraduate students rather than specifically those studying other undergraduate programmes. For this indicator, these students represent 6 per cent of the student population which has a limiting effect on the likely impact on an individual provider's performance.

Analysis suggests a numerical threshold of 60 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 60 per cent would result in 14 per cent of providers with point estimates below the numerical threshold. There are some larger providers below this numerical threshold and, thus, 30.1 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.

- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 60 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- We have had regard to the effect that a numerical threshold set at 60 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for 'Q1 ABCS (continuation)' would be below the numerical threshold for 25 providers (40.3 per cent). We would generally expect indicators for Q1 ABCS (continuation) to be lower than for other quintiles because the construction of the ABCS quintiles is such that students identified in Q1 would have the lowest historical performance across the sector.
  - The point estimate for 'Ethnicity – other' (to include other than white) would be below the numerical threshold for 37 providers (26.6 per cent).
  - The point estimate for 'Disability type – sensory, medical or physical impairments' would be below the numerical threshold for 13 providers (30.2 per cent).
  - The point estimate for 'Disability type – other or multiple impairments' would be below the numerical threshold for six providers (42.9 per cent).
- In addition, we have further tested a 60 per cent threshold by considering the distribution of individual benchmarks. There would be 17 providers (7 per cent) with point estimates and individual benchmarks below the numerical threshold. We noted that only one of these providers had a point estimate that was above its benchmark. We would consider the context of these providers when making any decision about compliance, but we nonetheless consider that this represents a sufficiently large proportion to suggest that the proposed downward adjustment for part-time undergraduate provision may not be sufficient for this mode and level of study. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

We therefore considered an alternative numerical threshold of 55 per cent. We considered that a threshold at this level would be more appropriate.

- 11.4 per cent of providers have a point estimate below a numerical threshold of 55 per cent. 27.5 per cent of students would be studying at providers with point estimates below a numerical threshold set at 55 per cent. There is a risk that a numerical threshold of 55 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 55 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS's view is that 45 per cent of students not continuing on their higher education course represents a significant proportion of students. We would have concerns about this proportion

of students not continuing with their courses and that a threshold below this level may not afford an appropriate level of protection to students.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	15 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	28 (11.4%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	47,430 (27.5%)
<b>Recommended numerical threshold level</b>	55%

## 15. Numerical threshold for: Continuation

**Mode of study:** Part-time

**Level of study:** Undergraduate with postgraduate components

**Figure B15: Sector overall rate = 66.3%**



**Sector median (unweighted): 75.9%**

**Sector weighted median: 57.6%**

**Recommended starting point before adjustment: 65%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time undergraduate courses and have identified that most sector-wide contextual factors do not demonstrate larger performance differences that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 60 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also considered the limited availability of data for this mode and level of study. There are fewer than 25 providers with point estimates for graduate outcomes data, which impacts the level of further analysis. We have therefore, in this instance, given weight to our policy intention of setting thresholds consistently, and have proposed a numerical threshold in line with the proposed numerical threshold for completion indicators for this mode and level of study. This also takes account of the observed differences between full and part-time students for other undergraduate levels of study.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

<b>Data issues</b>	Limited data set
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	1 (14.3%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	650 (56.4%)
<b>Recommended numerical threshold level</b>	60%

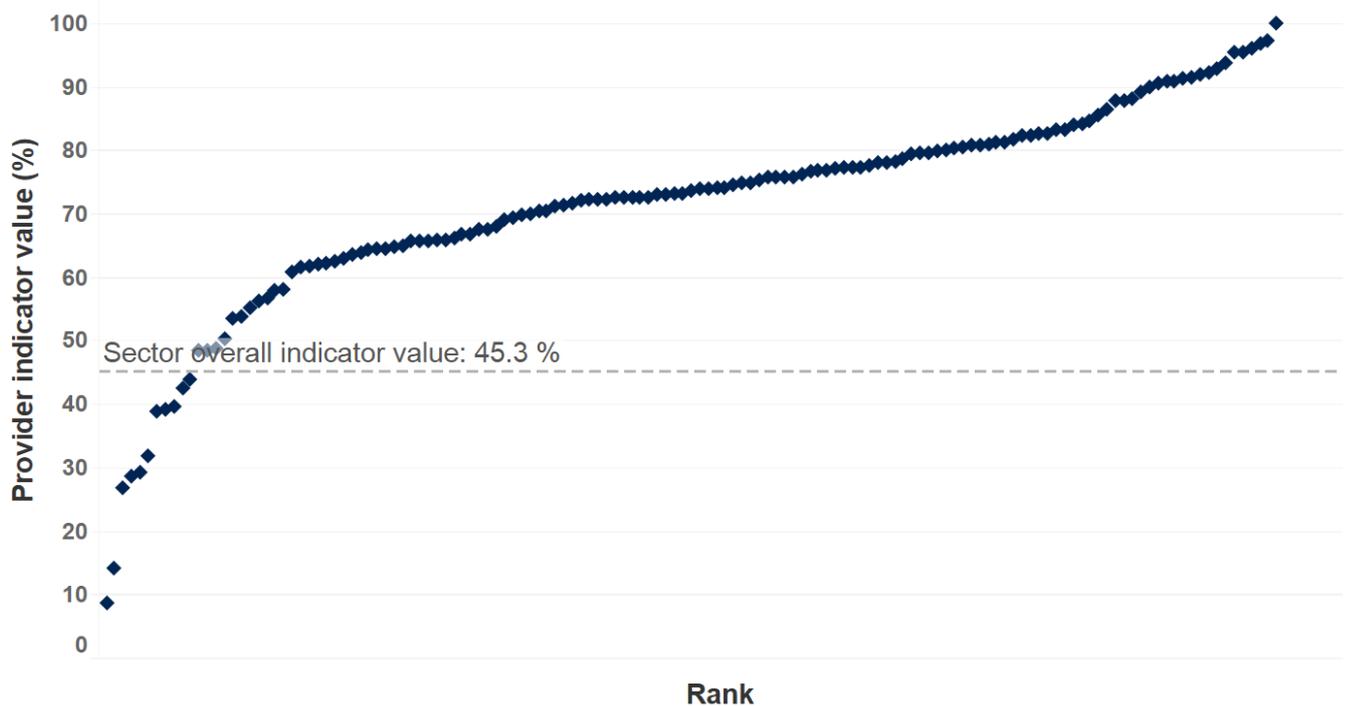
# Numerical thresholds for completion – cohort tracking: Part-time undergraduate

## 16. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Part-time

**Level of study:** First degree

**Figure B16: Sector overall rate = 45.3%**



**Sector median (unweighted):** 73.7%

**Sector weighted median:** 31.8%

**Recommended starting point before adjustment:** 70%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as set out in our stated policy intention. For this indicator, there is one very large provider that accounts for just over two-thirds of all part-time first degree students. The sector overall rate performance without this provider is 71.4 per cent, and we have given weight to this level when recommending a starting point as we think that including data from this provider would result in a starting point that is not representative of general performance in the sector.
- This is consistent with our approach for other part-time first degree indicators.

- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time undergraduate courses and have not identified any sector-wide contextual factors with larger performance differences that indicate that a larger adjustment would be recommended for this indicator.
- We have considered the unweighted sector data for this indicator to reduce the influence of a single large provider on our recommended adjustments.
- We have noted that there is some indication that students reporting a mental health condition have lower rates of completion compared with other students. The unweighted median completion for these students is 36.7 per cent compared with 73.7 per cent overall. Our Exploring Student Outcomes analysis (see Annex A) suggests that this performance difference after controlling for all factors except provider is between 4.9 and 7.9 percentage points. However, we note that there are only three providers with data points for this characteristic. 93 per cent of part-time first degree students reporting a mental health condition studied at the large provider for this indicator, and data shows that the performance difference for these students within this provider is fewer than three percentage points compared with the provider's overall performance.

Analysis suggests a numerical threshold of 60 per cent may have been reasonable because:

- It would reflect the average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 60 per cent would result in 15.8 per cent of providers with point estimates below the numerical threshold. However, this includes the large provider in this indicator, resulting in 71.8 per cent of students being covered by indicators below the recommended threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes shows some observable difference as a result of particular student characteristics, but this adjustment is sufficient to take account of the likely impact of that difference on an individual provider's performance.

- We have further tested a 60 per cent threshold by considering the distribution of individual benchmarks. There would be 18 providers (12.9 per cent) with point estimates and individual benchmarks below the numerical threshold. We would consider the context of these providers when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that this additional downward adjustment for undergraduate provision may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 60 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- We have had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for 'Ethnicity – Asian' would be below the numerical threshold for 14 providers (35.9 per cent).
  - The point estimate of 'Ethnicity– Black' would be below the numerical threshold for 15 providers (33.3 per cent)
  - The point estimate of 'Disability reported' would be below the numerical threshold for 22 providers (34.4 per cent)

We have therefore considered an alternative numerical threshold of 55 per cent. We considered that a threshold at this level would be more appropriate.

- 12.2 per cent of providers have a point estimate below a numerical threshold of 55 per cent. 68.8 per cent of students would be studying at providers with point estimates below a numerical threshold set at 55 per cent, as this the large provider in this indicator is below a numerical threshold of 55 per cent. We consider that this is a more proportionate threshold which has regard to our general duty to ensure our regulatory focus is targeted only at cases where action is needed.
- There would be 11 providers (7.9 per cent) with individual benchmarks below the numerical threshold

- There is, however, a risk that a numerical threshold of 55 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 55 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS's view is that 45 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

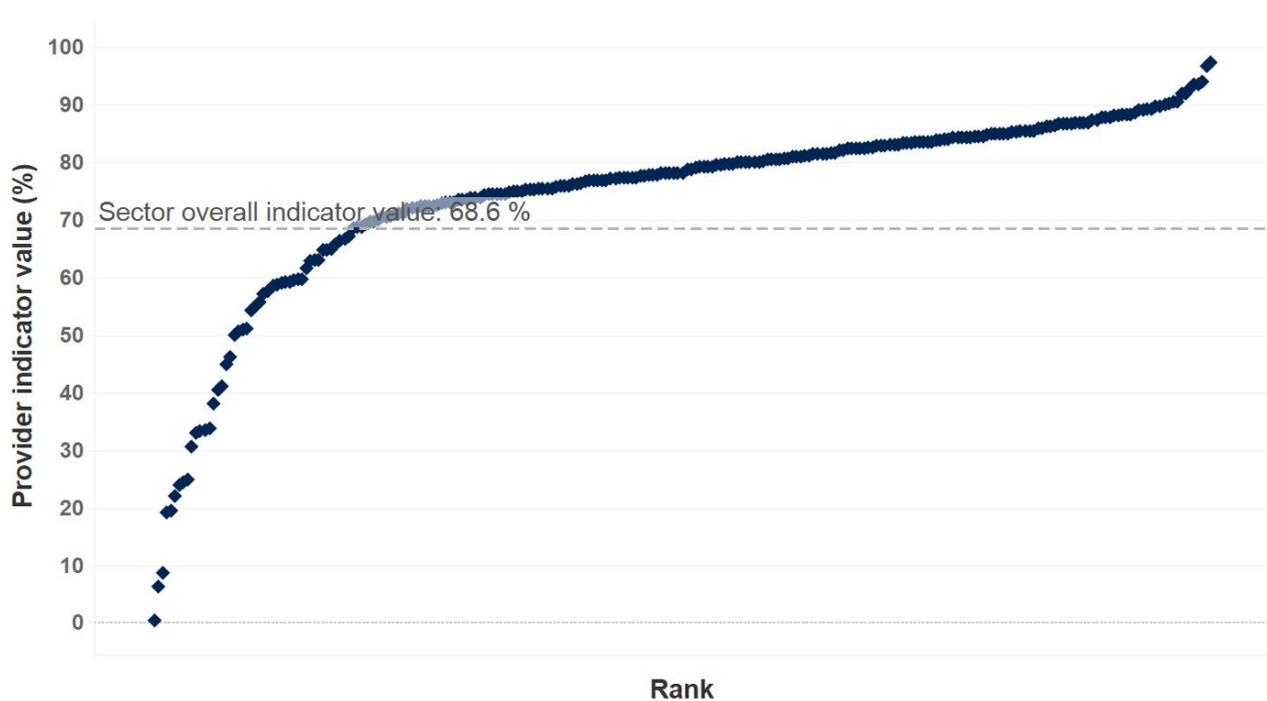
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	15 ppt below starting point
<b>Providers with point estimates below recommended numerical threshold level</b>	17 (12.2%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	129,240 (68.8%)
<b>Recommended numerical threshold level</b>	55%

## 17. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Part-time

**Level of study:** Other undergraduate

**Figure B17: Sector overall rate = 68.6%**



**Sector median (unweighted): 78.3%**

**Sector weighted median: 75.6%**

**Recommended starting point before adjustment: 70%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Consistent with the starting point for other indicators at this level and mode of study.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time undergraduate courses and have not identified sector-wide contextual factors that demonstrate larger performance gaps that would indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 60 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 60 per cent would result in 14.3 per cent of providers with point estimates below the numerical threshold. This includes several larger providers for this indicator. Thus, 28.5 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also had regard to the effect that a numerical threshold set at 60 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for 'Ethnicity – Black' would be below the numerical threshold for 31 providers (32.6 per cent).
  - The point estimate for 'Ethnicity – Other' would be below the numerical threshold for 12 providers (44.4 per cent).

We note that the population for these groups are relatively small compared with the overall population for this indicator. We have already considered these characteristics in our use of sector performance data and Exploring Student Outcomes analysis, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for part-time postgraduate provision may not be sufficient for this mode and level of study. However, we have set out our mechanisms for considering the context for any provider when making a decision about compliance. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

- We have further tested a 60 per cent threshold by considering the distribution of individual benchmarks. There would be 10 providers (4 per cent) with point estimates and individual

benchmarks below the numerical threshold. We would consider the context of these providers when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for part-time undergraduate provision may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we have also considered the consistency of this proposed numerical threshold with other proposed thresholds for this mode and level of study. We note that we have proposed a numerical threshold level of 55 per cent for both the continuation and completion (compound) indicators. We consider there is a risk of inconsistency in proposing a numerical threshold of 55 per cent for this indicator as we do not think that takes sufficient account of the likelihood of students leaving their studies at a later stage.

On balance, we therefore consider that a numerical threshold of 55 per cent would be most appropriate in this instance.

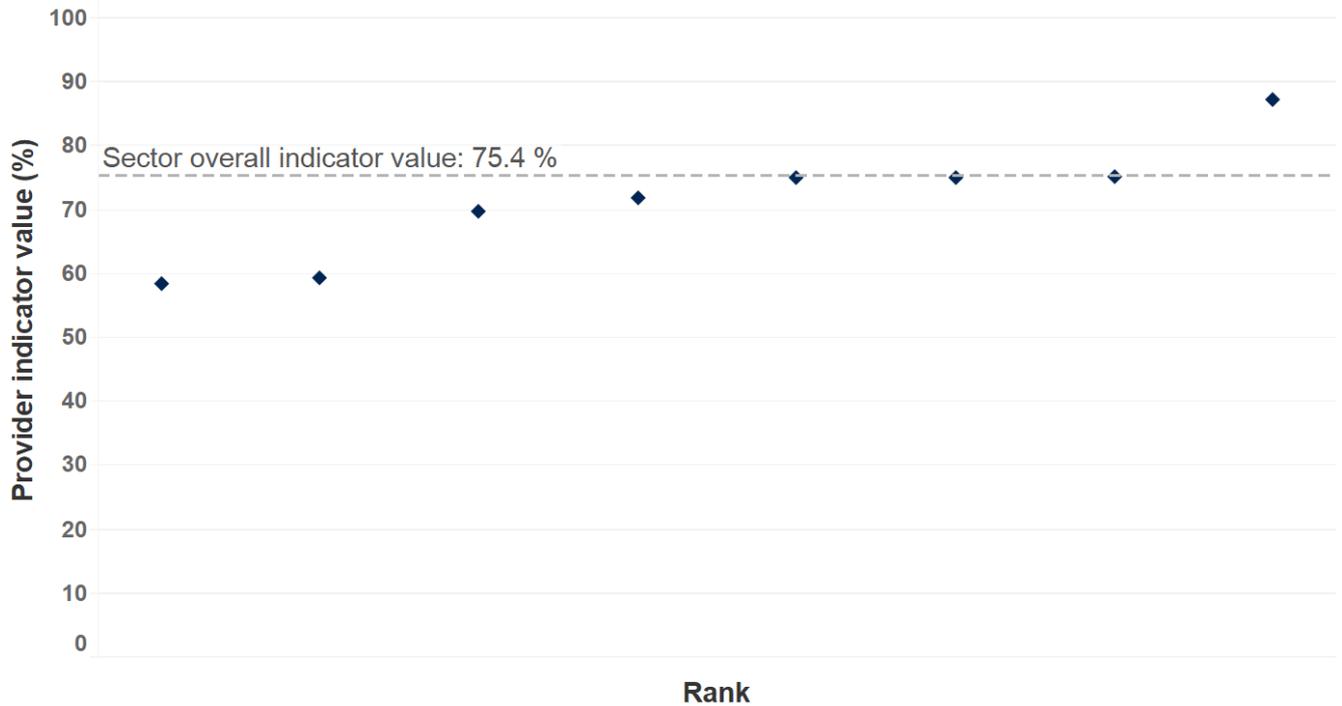
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	15 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	24 (9.6%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	70,040 (23.8%)
<b>Recommended numerical threshold level</b>	55%

## 18. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Part-time

**Level of study:** Undergraduate with postgraduate components

**Figure B18: Sector overall rate = 75.4%**



**Sector median (unweighted):** 73.4%

**Sector weighted median:** 75.0%

**Recommended starting point before adjustment:** 70%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Consistent with the starting point for other indicators at this level and mode of study.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time undergraduate courses and have not identified sector-wide contextual factors that demonstrate larger performance gaps that would indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 60 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also considered the limited availability of data for this mode and level of study. There are fewer than 25 providers with point estimates for graduate outcomes data, which impacts the level of further analysis. We have therefore, in this instance, given weight to our policy intention of setting thresholds consistently, and have proposed a numerical threshold in line with the proposed numerical threshold for continuation and completion (compound) indicators for this indicator. This is also consistent with the observed difference between full and part-time students for other undergraduate indicators.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

<b>Data issues</b>	Limited data set
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	2 (25.0%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	80 (17.3%)
<b>Recommended numerical threshold level</b>	60%

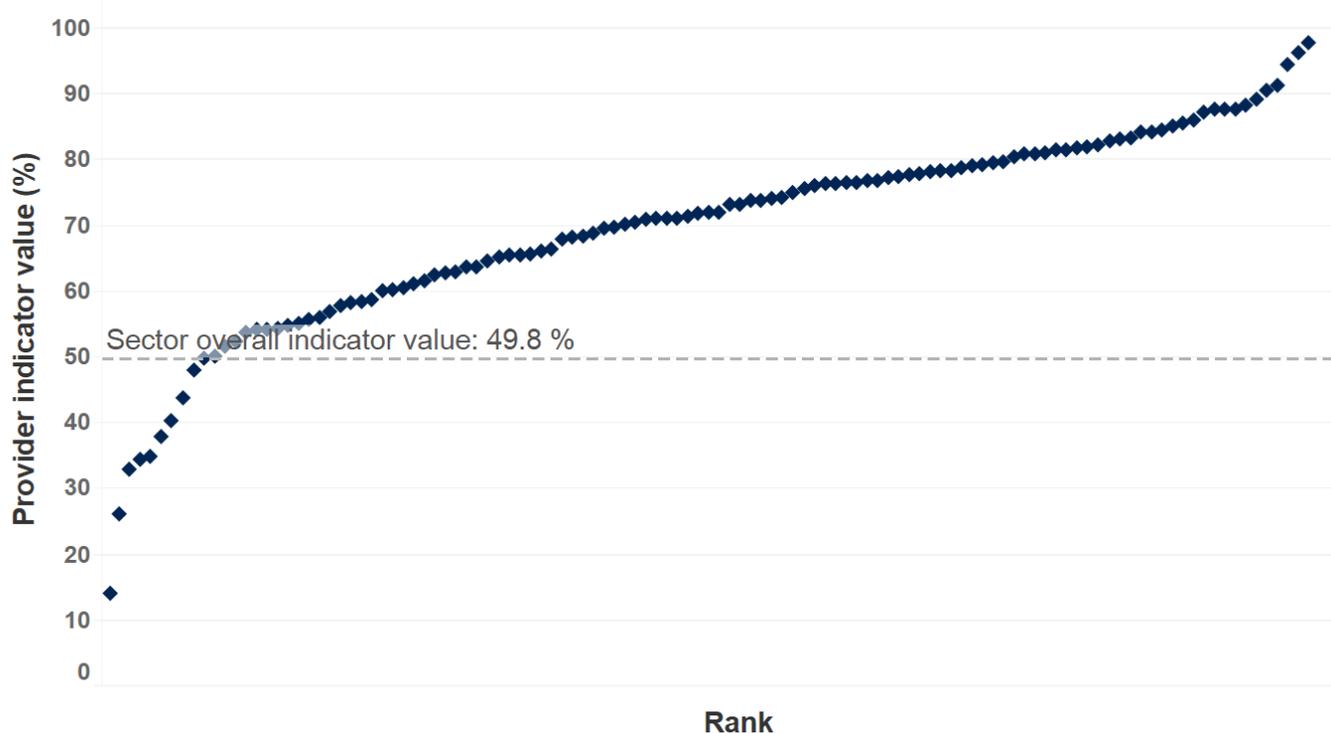
# Numerical thresholds for completion – compound indicator: Part-time undergraduate

## 19. Numerical threshold for: Completion – compound indicator

**Mode of study:** Part-time

**Level of study:** First degree

**Figure B19: Sector overall rate = 49.8%**



**Sector median (unweighted): 72.0%**

**Sector weighted median: 40.3%**

**Recommended starting point before adjustment: 65%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator. For this indicator, there is one very large provider that accounts for approximately 70 per cent of all part-time first degree students in this indicator. The sector overall rate performance without this provider is 67.8 per cent, and we have given weight to this level when recommending a starting point as we think that including data from this provider would result in a starting point that is not representative of general performance in the sector.

- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time undergraduate courses and have not identified any larger sector-wide performance differences that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 60 per cent may have been reasonable because:

- It would reflect the average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes shows some observable difference as a result of particular student characteristics, but this adjustment is sufficient to take account of the likely impact of that difference on an individual provider's performance.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 60 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 60 per cent would result in 23.5 per cent of providers with point estimates below the numerical threshold. Thus, 77.8 per cent of students would study at providers with a point estimate below the numerical threshold, including those studying at the large provider in this indicator. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.

- We have also had regard to the effect that a numerical threshold set at 60 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 27 providers (30.0 per cent).
  - The point estimate of ‘Ethnicity – Black’ would be below the numerical threshold for 12 providers (46.2 per cent).
  - The point estimate of ‘Ethnicity – Mixed’ would be below the numerical threshold for eight providers (57.1 per cent).
  - The point estimate of ‘Disability reported’ would be below the numerical threshold for 20 providers (37.7 per cent).
- In addition, we have further tested a 60 per cent threshold by considering the distribution of individual benchmarks. There would be 18 providers (15.7 per cent) with point estimates and individual benchmarks below the numerical threshold. We would consider the context of these providers when making any decision about compliance, but we nonetheless consider that this represents a sufficiently large proportion to suggest that the proposed downward adjustment for part-time undergraduate provision may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

We have therefore considered an alternative numerical threshold of 55 per cent. We considered that a threshold at this level would be more appropriate.

- 15.7 per cent of providers have a point estimate below a numerical threshold of 55 per cent. 75.7 per cent of students would be studying at providers with point estimates below a numerical threshold set at 55 per cent, as this the large provider in this indicator is below a numerical threshold of 55 per cent. We consider that this is a more proportionate threshold which has regard to our general duty to ensure our regulatory focus is targeted only at cases where action is needed.
- There would be six providers with individual benchmarks below the numerical threshold.
- There is, however, a risk that a numerical threshold of 55 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 55 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 45 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

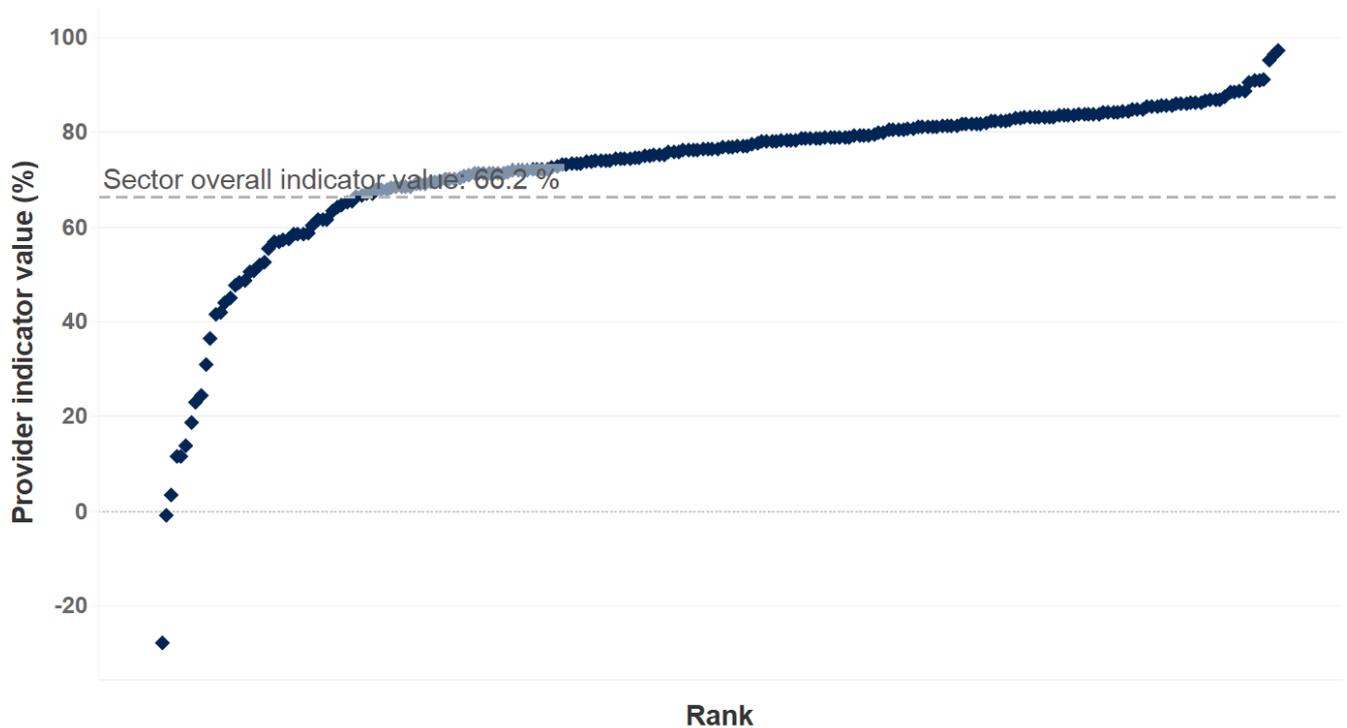
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below recommended threshold level</b>	18 (15.7%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	116,310 (75.7%)
<b>Recommended numerical threshold level</b>	55%

## 20. Numerical threshold for: Completion – compound indicator

**Mode of study:** Part-time

**Level of study:** Other undergraduate

**Figure B20: Sector overall rate = 66.2%**



**Sector median (unweighted): 76.8%**

**Sector weighted median: 73.8%**

**Recommended starting point before adjustment: 70%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Consistent with the starting point for other indicators at this level and mode of study.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time undergraduate courses and for most sector-wide contextual factors have not identified larger performance differences that would indicate that a larger adjustment would be recommended for this indicator.
- However, there is some evidence that there may be a larger performance difference for black students, and for students of unknown ethnicity. The sector weighted median for black students is 58.4 per cent and for students of unknown ethnicity 38.9 per cent, larger differences by comparison with the overall sector-weighted median than the proposed five percentage point downward adjustment for part-time undergraduate provision. Our Exploring Student Outcomes analysis (see Annex A) suggests that this difference is closer to five percentage points once other factors are controlled for, compared with white students.
- There is also some evidence of a larger performance difference for students reporting some types of disability. The sector weighted median for students reporting a mental health condition is 32.5 per cent and for students reporting social or communication impairments 36.8 per cent, larger than the proposed 5 percentage points downward adjustment for part-time undergraduate provision. Our Exploring Student Outcomes analysis for all UK-domiciled part-time undergraduate students suggests that the performance difference for students reporting a mental health condition may be between 7.9 and 4.9 percentage points when other factors are controlled for compared with students not reporting a disability, although the difference for students with social or communication impairments reduces. We note, however, that students reporting these disability types represent less than 1 per cent of the population for this indicator, limiting the likely impact on an individual provider's performance.

Analysis suggests a numerical threshold of 60 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 60 per cent would result in 13.5 per cent of providers with point estimates below the numerical threshold. Thus, 28.3 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have further tested a 60 per cent threshold by considering the distribution of individual benchmarks. There would be 13 providers (6 per cent) with point estimates and individual

benchmarks below the numerical threshold. We would consider the context of these providers when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for part-time undergraduate provision may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 60 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- We have also had regard to the effect that a numerical threshold set at 60 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for 'Ethnicity – Asian' would be below the numerical threshold for 20 providers (29.4 per cent).
  - The point estimate for 'Ethnicity – Black' would be below the numerical threshold for 20 providers (40.8 per cent).
  - The point estimate for 'Ethnicity – Mixed' would be below the numerical threshold for eight providers (32.0 per cent).
  - The point estimate for 'Domicile – other EU or international' would be below the numerical threshold for seven providers (46.7 per cent).
  - The point estimate for 'Eligible for free school meals' would be below the numerical threshold for six providers (37.5 per cent).

We therefore considered an alternative numerical threshold of 55 per cent. We considered that a threshold at this level would be more appropriate.

- 9.6 per cent of providers have a point estimate below a numerical threshold of 55 per cent. 26.4 per cent of students would be studying at providers with point estimates below a numerical threshold set at 55 per cent. There is a risk that a numerical threshold of 55 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 55 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.

- The OfS's view is that 45 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	15 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	22 (9.6%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	39,640 (26.4%)
<b>Recommended numerical threshold level</b>	55%

## 21. Numerical threshold for: Completion – compound indicator

**Mode of study:** Part-time

**Level of study:** Undergraduate with postgraduate components

**Figure B21: Sector overall rate = 65.4%**



**Sector median (unweighted):** 75.5%

**Sector weighted median:** 43.1%

**Recommended starting point before adjustment:** 65%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Consistent with the starting point for other indicators at this level and mode of study.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time undergraduate courses and for most sector-wide contextual factors have not identified larger performance differences that would indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 60 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also considered the limited availability of data for this mode and level of study. There are fewer than 25 providers with point estimates for graduate outcomes data, which impacts the level of further analysis. We have therefore, in this instance, given weight to our policy intention of setting thresholds consistently, and have proposed a numerical threshold in line with the proposed numerical threshold for continuation and completion (cohort tracking) indicators. We have also taken account of the difference in outcomes between full and part-time students for other undergraduate levels of study in reaching this proposal.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

<b>Data issues</b>	Limited data set
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	1 (25.0%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	690 (62.7%)
<b>Recommended numerical threshold level</b>	60%

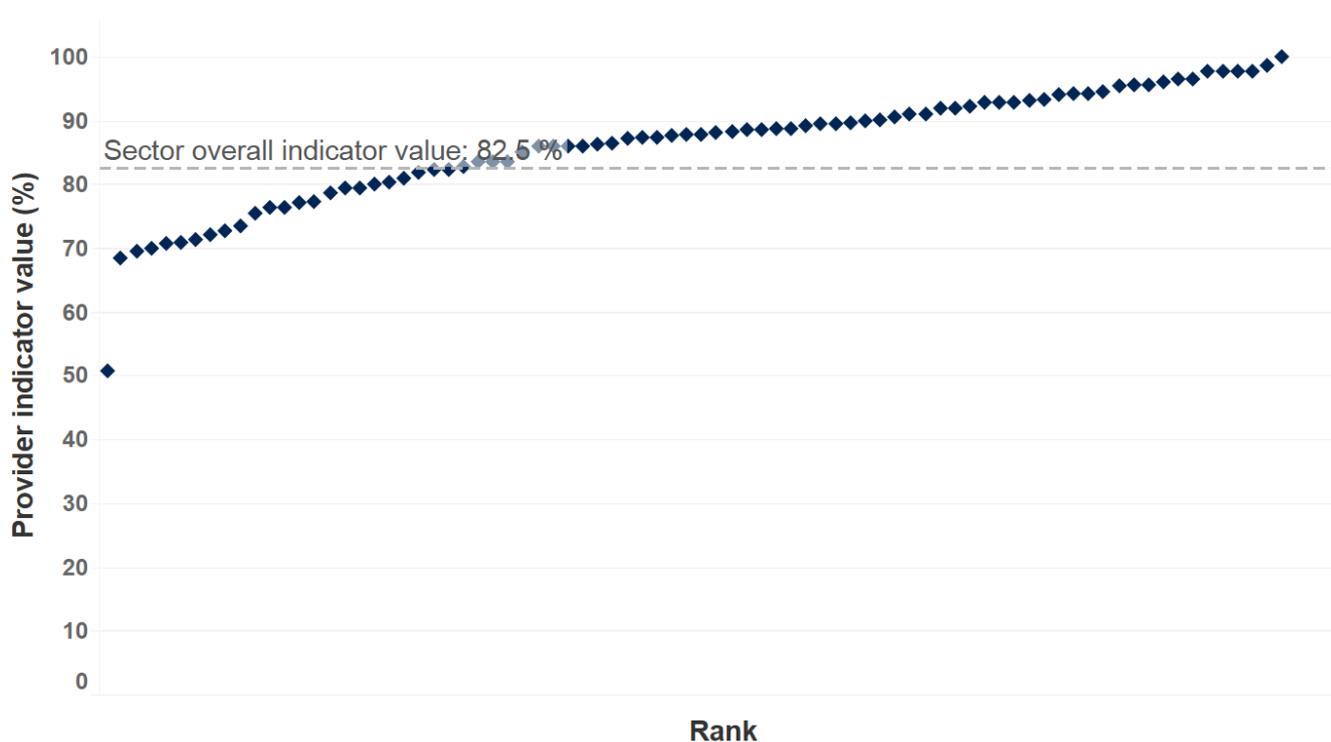
# Numerical thresholds for progression: Part-time undergraduate

## 22. Numerical threshold for: Progression

**Mode of study:** Part-time

**Level of study:** First degree

**Figure B22: Sector overall rate = 82.5%**



**Sector median (unweighted):** 88.0%

**Sector weighted median:** 76.5%

**Recommended starting point before adjustment:** 85%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as set out in our policy intention. For this mode and level of study, there is one very large provider and sector overall rate performance without this provider is 86.8 per cent. We have given weight to this level when recommending a starting point as we think that including data from this provider would result in a starting point that is not representative of general performance in the sector. This is consistent with our approach for other indicators for this mode and level of study.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).

- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time undergraduate courses and have not identified any sector-wide contextual factors based on student characteristics with larger performance differences that indicate that a larger adjustment would be recommended for this indicator.
- The population for this indicator is smaller than for other indicators, consisting of 16,810 students from 80 providers. There are therefore limitations in the statistical validity of considering further breakdowns of the data.
- We have considered the unweighted sector data for this indicator to reduce the influence of a single large provider on our recommended adjustments.
- We have, however, noted that some subject areas have weighted median rates that are below the proposed numerical threshold, namely:
  - Combined and general studies (weighted median figure suppressed based on low number of providers)
  - Creative Arts and Design (76.5)
  - Economics (weighted median figure suppressed based on low number of providers)
  - Education and teaching (75.5 per cent)
  - English Studies (weighted median figure suppressed based on low number of providers)
  - History and Archaeology (weighted median figure suppressed based on low number of providers)
  - Psychology (72.4 per cent)

The student population for these subject areas account for 23 per cent of the total student population for this indicator.

- We propose to include subject of study as a factor in benchmarking data, to take account of the impact that differences in subject area may have on a provider's performance, depending on the subjects it offers. Where there are identified sector-wide differences, we also propose to include a provider's subject offering in contextual considerations of their individual performance where a provider specialises in a particular subject.

Analysis suggests a numerical threshold of 80 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points. We have noted the mechanisms we will use to consider the context of individual providers with a more specialised subject offering.
- We have further tested an 80 per cent threshold by considering the distribution of individual benchmarks. There would be six providers (9 per cent) with point estimates and individual benchmarks below the numerical threshold. We noted that none of these providers had a point estimate that was above its benchmark. We would consider the context of these providers when making any decision about compliance, but we nonetheless consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for part-time undergraduate provision may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.
- We have noted that the use of survey data for this indicator results in a greater degree of statistical uncertainty around the data for individual providers, especially for smaller providers. We have considered mechanisms for taking account of greater statistical uncertainty in the data in Proposal 6 of the consultation, and do not propose to make additional adjustments to the numerical threshold to take further account of this at a sector level.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 80 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 80 per cent would result in 22.5 per cent of providers with point estimates below the numerical threshold. However, although the majority of these are smaller providers with fewer than 500 students, the large provider in this indicator is also below this threshold, resulting in 53.3 per cent of students being covered by indicators below the recommended numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the

numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Age on entry – under 21 years’ would be below the numerical threshold for four providers (30.8 per cent).
- The point estimate for ‘IMD Quintile – Q1 or Q2’ would be below the numerical threshold for 18 providers (39.1 per cent).
- The point estimate for ‘Disability reported’ would be below the numerical threshold for five providers (35.7 per cent).
- The point estimate for ‘Ethnicity – other’ (i.e. other than white) would be below the numerical threshold for 13 providers (50.0 per cent).

We therefore considered an alternative numerical threshold of 75 per cent. We considered that a threshold at this level would be more appropriate.

- 12.5 per cent of providers have a point estimate below a numerical threshold of 75 per cent. 5.7 per cent of students would be studying at providers with point estimates below a numerical threshold set at 75 per cent. There is a risk that a numerical threshold of 75 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 75 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 25 per cent of students not progressing to positive outcomes from their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not progressing to positive outcomes and that a threshold below this level may not afford an appropriate level of protection to students.

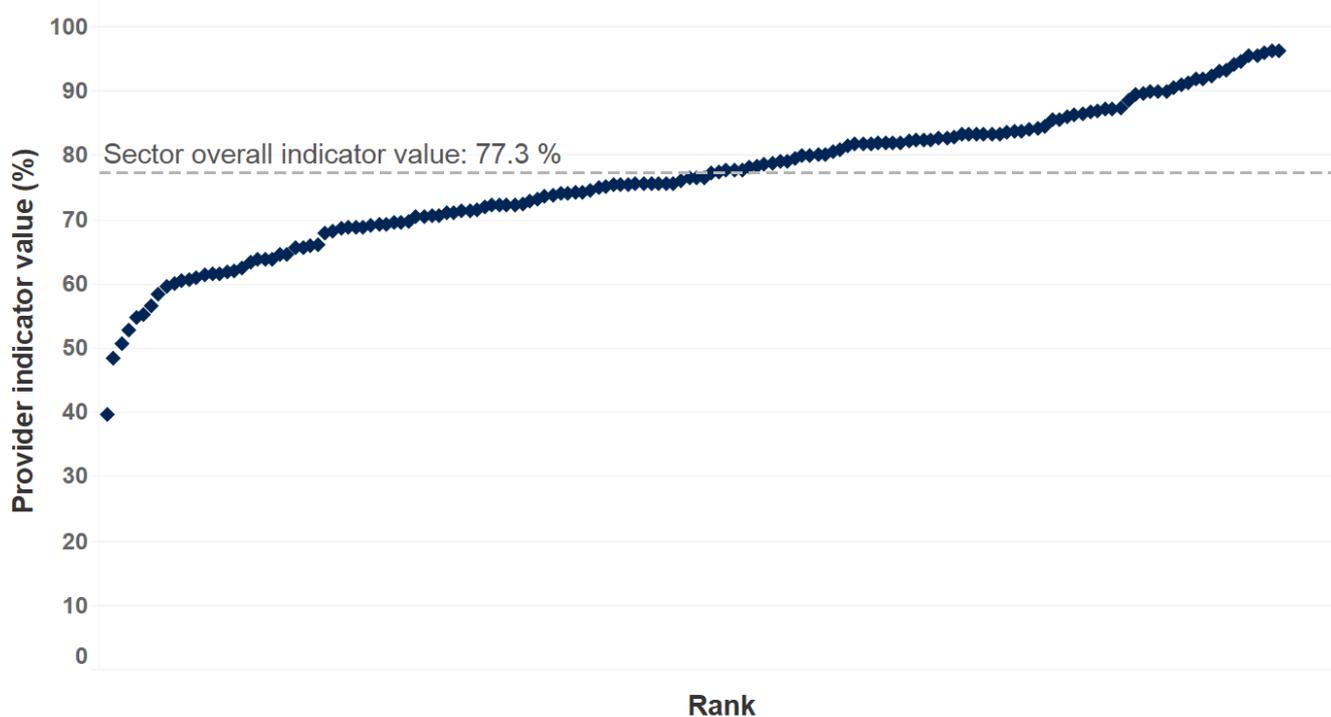
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below recommended threshold level</b>	10 (12.5%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	950 (5.7%)
<b>Recommended threshold level</b>	75%

## 23. Numerical threshold for: Progression

**Mode of study:** Part-time

**Level of study:** Other undergraduate

**Figure B23: Sector overall rate = 77.3%**



**Sector median (unweighted):** 76.5%

**Sector weighted median:** 75.8%

**Recommended starting point before adjustment:** 75%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time undergraduate courses and have not identified sector-wide contextual factors that demonstrate larger performance gaps that would indicate that a larger adjustment would be recommended for this indicator.
- We have noted the smaller population for this indicator with 15,980 students and consider that we would be less statistically confident in further disaggregation of this data.

Analysis suggests a numerical threshold of 65 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 65 per cent would result in 16 per cent of providers with point estimates below the numerical threshold. Thus, 12.1 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have had regard to the effect that a numerical threshold set at 65 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators for the point estimate for 'Age on entry – under 21 years', where point estimates would be below the numerical threshold for 13 providers (31.7 per cent). We have already noted the relatively small population for this indicator as a whole. We have also already considered student characteristics in our use of sector performance data and Exploring Student Outcomes analysis, and we consider that this example does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for part-time undergraduate provision may not be sufficient for this mode and level of study. However, we have set out our mechanisms for considering the context for any provider when making a decision about compliance. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.
- We have further tested a 65 per cent threshold by considering the distribution of individual benchmarks. There would be no providers with point estimates and individual benchmarks below the numerical threshold. We would consider the context of these providers when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for part-time

undergraduate provision may not be sufficient for first degree provision. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

- We have noted that the use of survey data for this indicator results in a greater degree of statistical uncertainty around the data for individual providers, especially for smaller providers. We have considered mechanisms for taking account of greater statistical uncertainty in the data in Proposal 6 of the consultation, and do not propose to make additional adjustments to the numerical threshold to take further account of this at a sector level.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	25 (16.0%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	1,960 (12.1%)
<b>Recommended numerical threshold level</b>	65%

## 24. Numerical threshold for: Progression

**Mode of study:** Part-time

**Level of study:** Undergraduate with postgraduate components

- This mode and level of study has a particularly small population and, given the relatively recent introduction of the graduate outcomes survey, we do not have data that enables us to consider sector performance in the same way that we have for other indicators.
- We think it is reasonable to set a numerical threshold for this indicator at this point in time, as we expect data to become available that will enable us to consider performance before the next planned review of numerical threshold levels.

We consider that a numerical threshold of 80 per cent may be reasonable because:

- It is consistent with the proposed numerical threshold level for progression for full-time students at this level of study. Our analysis of other levels of study suggests that it is reasonable to propose levels for numerical thresholds with this consistency, especially for progression indicators where there is a much-reduced difference between the outcomes for full and part-time students than for continuation and completion indicators. We have given weight to this factor in making this proposal.
- We have also noted the relationship with existing employment for students at this mode and level of study, which we think further suggests that a threshold at this level would be proportionate.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

<b>Data issues</b>	No data available
<b>Recommended adjustment</b>	N/A
<b>Providers with point estimates below adjusted threshold</b>	N/A
<b>Students studying at providers with point estimates below recommended threshold level</b>	N/A
<b>Recommended threshold level</b>	80%

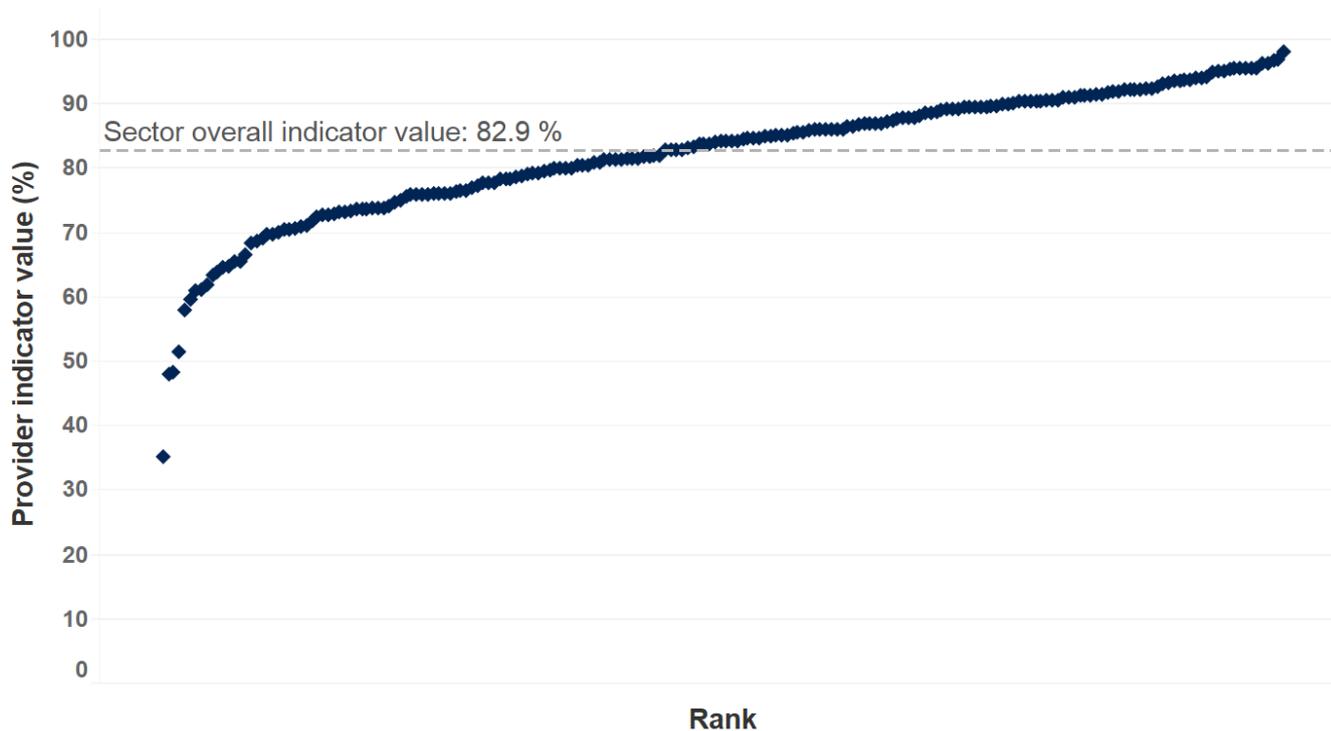
# Numerical thresholds for apprenticeship: Undergraduate

## 25. Numerical threshold for: Continuation

**Mode of study:** Apprenticeship

**Level of study:** Undergraduate

**Figure B25: Sector overall rate = 82.9%**



**Sector median (unweighted):** 84.3%

**Sector weighted median:** 86.1%

**Recommended starting point before adjustment:** 80%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for undergraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 75 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have further tested a 75 per cent threshold by considering the distribution of individual benchmarks. There would be one provider with a point estimate and individual benchmark below the numerical threshold. We would consider the context of this provider when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for apprenticeship undergraduate provision may not be sufficient. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 75 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 75 per cent would result in 21.6 per cent of providers with point estimates below the numerical threshold. The majority of these are smaller providers with fewer than 500 students. Thus, 18.5 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.

- We have also had regard to the effect that a numerical threshold set at 75 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 56 providers (37.3 per cent).
  - There are other split indicators where there is an indication of a higher proportion of indicators that would be below the numerical threshold, but there are fewer than 10 data points available and we do not consider that is sufficient data to influence our judgement.

We therefore considered an alternative numerical threshold of 70 per cent. We considered that a threshold at this level would be more appropriate.

- 10.3 per cent of providers have a point estimate below a numerical threshold of 70 per cent. 10.3 per cent of students would be studying at providers with point estimates below a numerical threshold set at 70 per cent. There is a risk that a numerical threshold of 70 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 70 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 30 per cent of students not continuing on their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not continuing with their courses and that a threshold below this level may not afford an appropriate level of protection to students.

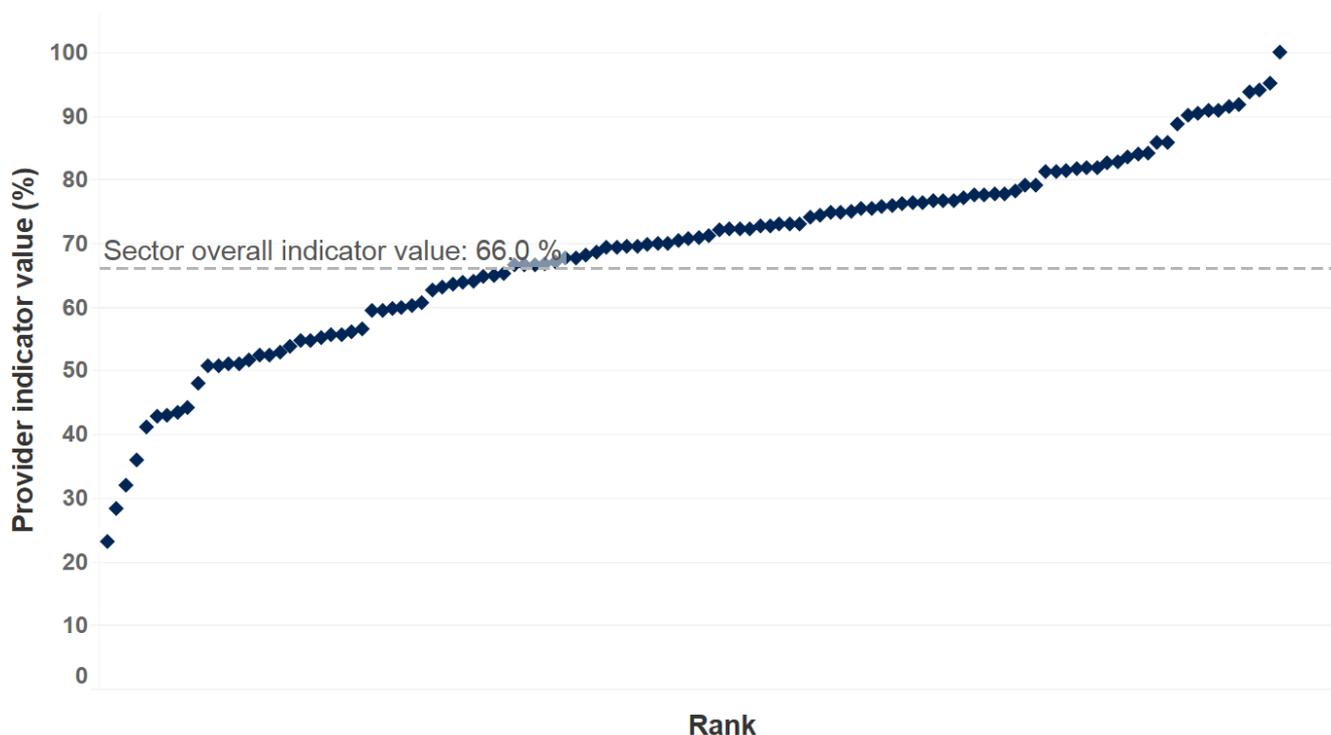
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted threshold</b>	21 (10.3%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	4,530 (10.3%)
<b>Recommended threshold level</b>	70%

## 26. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Apprenticeship

**Level of study:** Undergraduate

**Figure B26: Sector overall rate = 66.0%**



**Sector median (unweighted):** 70.9

**Sector weighted median:** 67.2 %

**Recommended starting point before adjustment:** 65%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for undergraduate courses and have not identified any larger sector-wide performance gaps that indicate that a larger adjustment would be recommended for this indicator.
- We have noted a difference in performance for this indicator for students reporting a disability, with a sector weighted median of 32.0 per cent. However, disabled students represent 3.7 per cent of students for this indicator, and we consider that this contextual factor is likely to have a limited impact on an individual provider's performance.

Analysis suggests a numerical threshold of 60 per cent may have been reasonable because:

- It would reflect the average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have further tested a 60 per cent threshold by considering the distribution of individual benchmarks. There would be no provider with a point estimate and individual benchmark below the numerical threshold.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 60 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 60 per cent would result in 25.9 per cent of providers with point estimates below the numerical threshold. Thus, 29.7 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.

- We have also had regard to the effect that a numerical threshold set at 60 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘Age on entry – 21 to 30 years’ would be below the numerical threshold for 20 providers (37.7 per cent).
  - The point estimate for ‘Ethnicity – other’ (to include ethnicities other than white) would be below the numerical threshold for seven providers (41.2 per cent).
  - The point estimate for ‘POLAR quintile – Q1 or Q2’ would be below the numerical threshold for 25 providers (33.8 per cent).
  - The point estimate for ‘Sex – male’ would be below the numerical threshold for 22 providers (31.9 per cent).

We therefore considered an alternative numerical threshold of 55 per cent. We considered that a threshold at this level would be more appropriate.

- 18.1 per cent of providers have a point estimate below a numerical threshold of 55 per cent. 22.0 per cent of students would be studying at providers with point estimates below a numerical threshold set at 55 per cent. There is a risk that a numerical threshold of 55 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 55 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 45 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

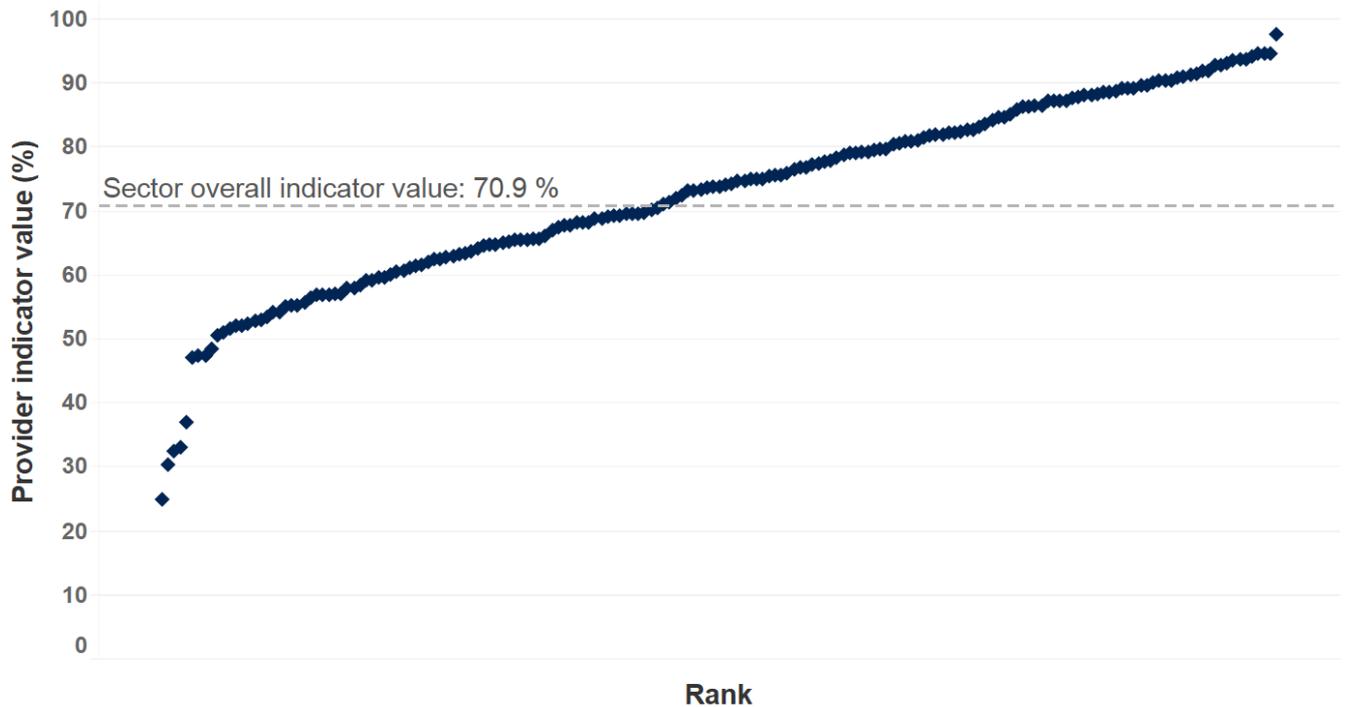
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted threshold</b>	21 (18.1%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	2,960 (22.0%)
<b>Recommended threshold level</b>	55%

## 27. Numerical threshold for: Completion – compound indicator

**Mode of study:** Apprenticeship

**Level of study:** Undergraduate

**Figure B27: Sector overall rate = 70.9%**



**Sector median (unweighted): 73.8%**

**Sector weighted median: 76.8 %**

**Recommended starting point before adjustment: 70%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for undergraduate courses and have not identified any larger sector-wide performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 60 per cent may have been reasonable because:

- It would reflect the average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have further tested a 60 per cent threshold by considering the distribution of individual benchmarks. There would be one provider with a point estimate and individual benchmark below the numerical threshold. We would consider the context of this provider when making any decision about compliance, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for apprenticeship undergraduate provision may not be sufficient. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 60 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 60 per cent would result in 20.4 per cent of providers with point estimates below the numerical threshold. Thus, 18.2 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 60 per cent would have on the proportion of providers where point estimates for split indicators would be below the

numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 36 providers (30 per cent).
- The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for three providers (33.3 per cent).

We therefore considered an alternative numerical threshold of 55 per cent. We considered that a threshold at this level would be more appropriate.

- 11.6 per cent of providers have a point estimate below a numerical threshold of 55 per cent. 10.1 per cent of students would be studying at providers with point estimates below a numerical threshold set at 55 per cent. There is a risk that a numerical threshold of 55 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 55 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 45 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

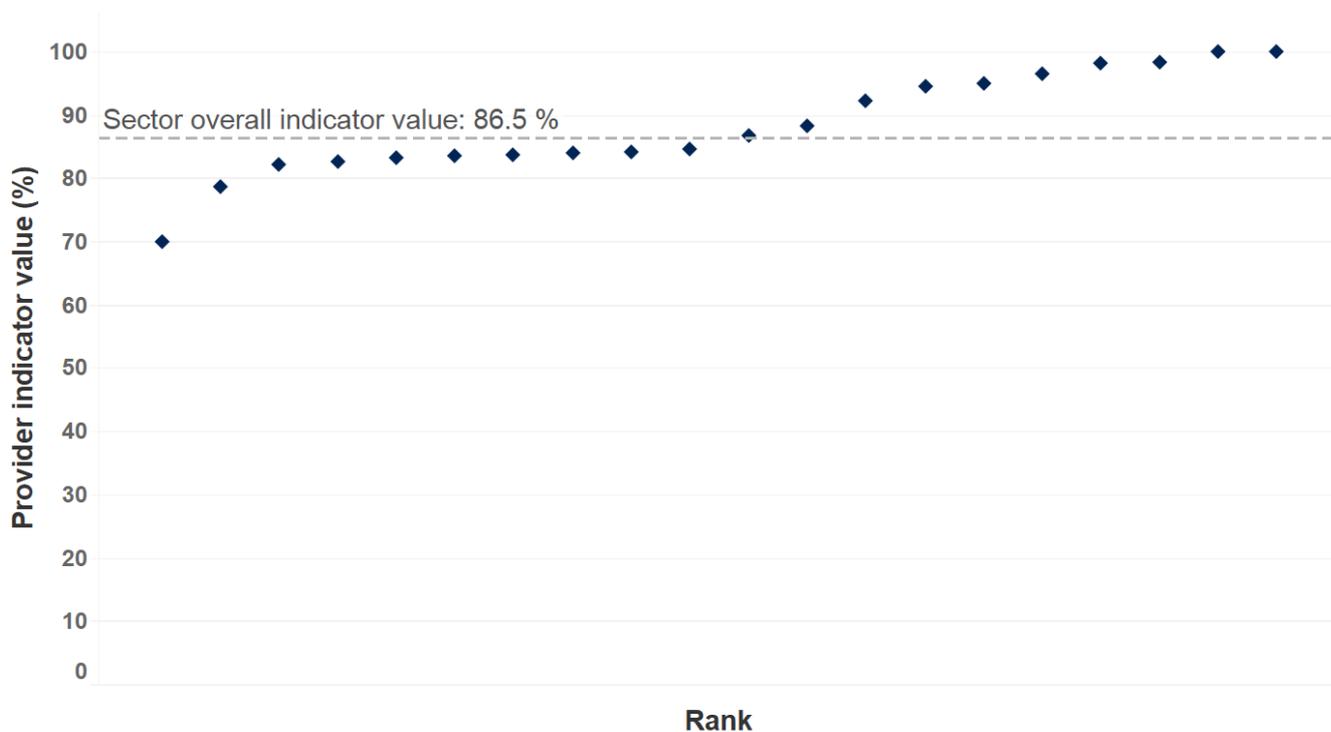
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	15 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	21 (11.6%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	4,220 (10.6%)
<b>Recommended threshold level</b>	55%

## 28. Numerical threshold for: Progression

**Mode of study:** Apprenticeship

**Level of study:** Undergraduate

**Figure B28: Sector overall rate = 86.5%**



**Sector median (unweighted): 85.7%**

**Sector weighted median: 84.7 %**

**Recommended starting point before adjustment: 85%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for undergraduate courses and have not identified any larger sector-wide performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 75 per cent may be reasonable because:

- It would reflect the average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have further tested a 75 per cent threshold by considering the distribution of individual benchmarks. There would be no provider with a point estimate and individual benchmark below the numerical threshold.
- We have also considered the limited availability of data for this mode and level of study. There are fewer than 25 providers with point estimates for graduate outcomes data, which impacts the level of further analysis. We have therefore, in this instance, given weight to our policy intention of setting thresholds consistently, and have proposed a numerical threshold with a 10 per cent downward adjustment from the starting point, in line with other proposed numerical threshold for progression for undergraduate students.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	1 (5.0%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	40 (3.7%)
<b>Recommended threshold level</b>	75%

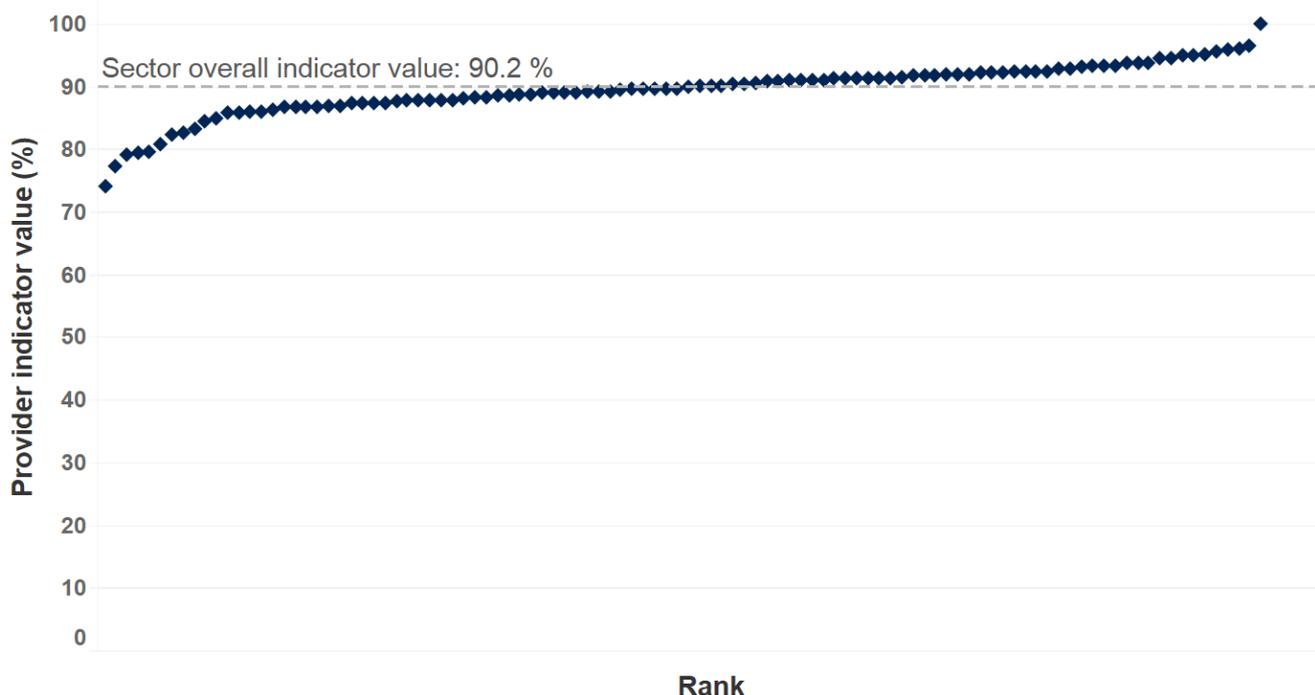
# Numerical thresholds for continuation: Full-time postgraduate

## 29. Numerical threshold for: Continuation

**Mode of study:** Full-time

**Level of study:** PGCE

**Figure B29: Sector overall rate = 90.2%**



**Sector median (unweighted):** 89.9%

**Sector weighted median:** 90.4%

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Considers the starting point used for other numerical thresholds at postgraduate level.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time undergraduate courses and have identified that most sector-wide contextual factors do not indicate larger performance gaps that would mean a larger adjustment would be recommended for this indicator.
- However, there is some evidence of a larger performance gap for mature students. For students aged 31 or over on entry, the difference in weighted sector median is 5.9 percentage points, slightly more than the proposed downward for full-time undergraduate provision adjustment and 0.5 percentage points below the proposed numerical threshold. Our regression analysis suggests there is an increasing performance gap for older students, especially for those aged 41 or over on entry. However, we note that this analysis considers all postgraduate students and does not identify gaps specifically for PGCE students. We note that students in this age group represent 19 per cent of PGCE students and consider that this limits the likely impact of this contextual factor on an individual provider's performance.

Analysis suggests a numerical threshold of 85 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- The effect of setting the numerical threshold at 85 per cent would result in 9.6 per cent of providers with point estimates below the numerical threshold. Thus, 2.5 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a larger proportion of providers would have split indicators where this was the case. For example:
  - The point estimate for 'Age on entry – 31 years and over' would be below the numerical threshold for 48 providers (55.8 per cent).

- The point estimate for 'Disability reported' would be below the numerical threshold for 27 providers (37.0 per cent).
- The point estimate for 'Ethnicity – Black' would be below the numerical threshold for eight providers (27.6 per cent).

We note that the population for these groups are relatively small compared with the overall population for this indicator. We have already considered these characteristics in our use of sector performance data and Exploring Student Outcomes analysis, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for postgraduate provision may not be sufficient for PGCE provision. However, we have set out our mechanisms for considering the context for any provider when making a decision about compliance. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

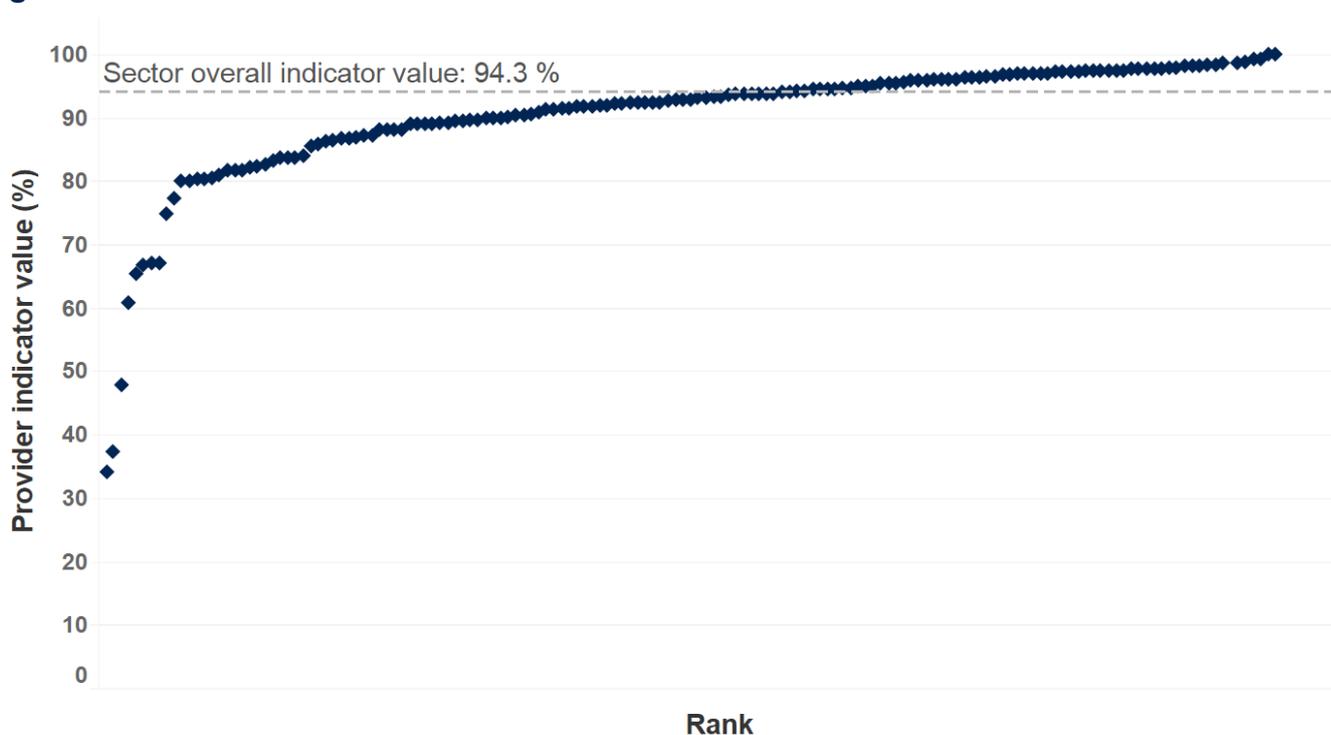
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	10 (9.6%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	2,090 (2.5%)
<b>Recommended numerical threshold level</b>	85%

## 30. Numerical threshold for: Continuation

**Mode of study:** Full-time

**Level of study:** Postgraduate taught masters

**Figure B20: Sector overall rate = 94.3%**



**Sector median (unweighted):** 93.0%

**Sector weighted median:** 96.2%

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Considers the starting point used for other numerical thresholds at postgraduate level.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and have identified that most sector-wide contextual factors do not indicate larger performance gaps that would mean a larger adjustment would be recommended for this indicator.
- Our analysis has suggested that there may be larger performance gap for black, UK-domiciled students. The weighted median for these students is 84.8 per cent, slightly larger than the proposed 5 percentage points downward adjustment when compared with the weighted sector median. Regression analysis suggests the largest gap is 6.1 percentage points for Black or Black British – Caribbean students compared with white UK-domiciled students. However, we note that ethnicity data is only included in this analysis for UK-domiciled students. This indicator has a particularly high proportion of students who are non-UK-domiciled (65 per cent). As a result of this, black UK-domiciled students represent 4 per cent of the overall student population for this indicator, and we consider that this limits the potential impact on an individual provider's data.

Analysis suggests a numerical threshold of 85 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in 17 per cent of providers with point estimates below the numerical threshold. Thus, 5.3 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 85 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- We have had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 46 providers (35.9 per cent).
  - The point estimate for ‘IMD quintile – Q1 or Q2’ would be below the numerical threshold for 39 providers (29.5 per cent).
  - The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for 41 providers (41.8 per cent).
  - The point estimate for ‘Disability – mental health condition’ would be below the numerical threshold for 37 providers (39.8 per cent).

We therefore considered an alternative numerical threshold of 80 per cent. We considered that a threshold at this level would be more appropriate.

- 6.5 per cent of providers have a point estimate below a numerical threshold of 80 per cent. 1.9 per cent of students would be studying at providers with point estimates below a numerical threshold set at 80 per cent. There is a risk that a numerical threshold of 80 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 80 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 20 per cent of students not continuing on their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not continuing with their courses and that a threshold below this level may not afford an appropriate level of protection to students.

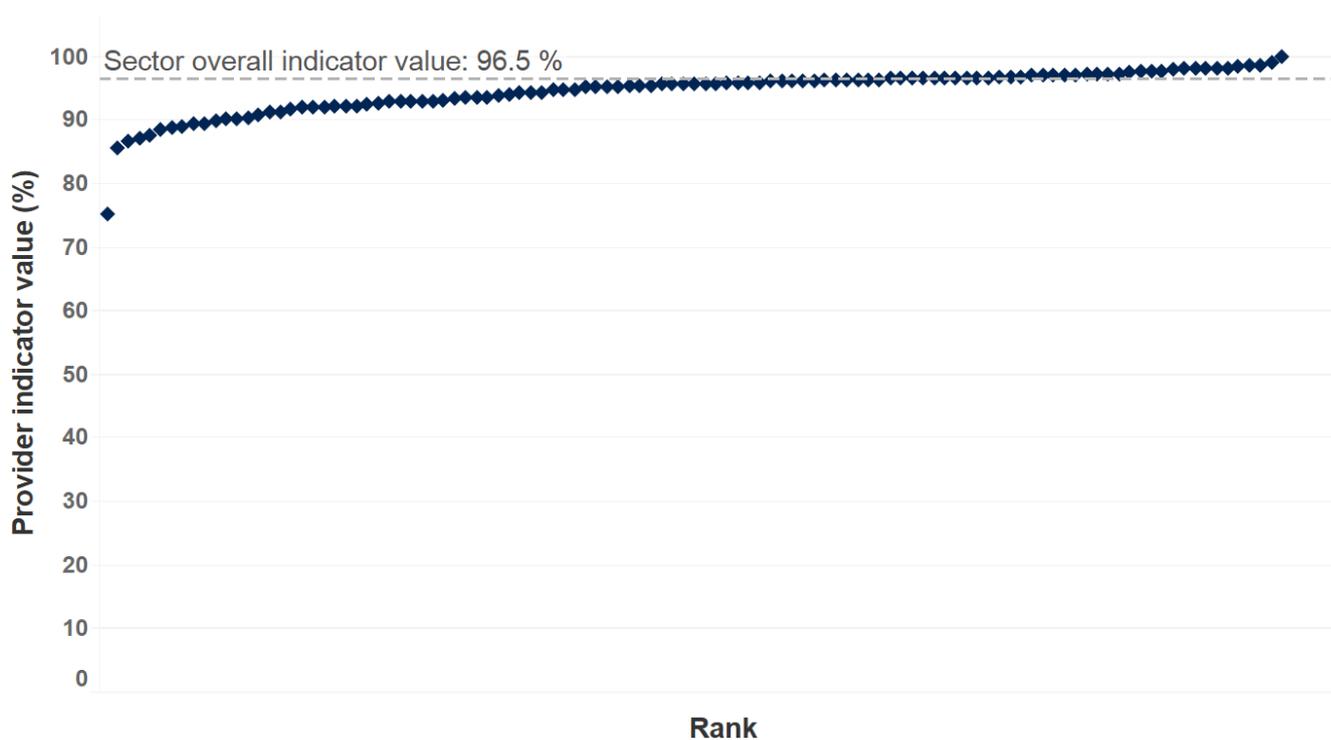
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	10 (6.5%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	11,460 (1.9%)
<b>Recommended numerical threshold level</b>	80%

## 31. Numerical threshold for: Continuation

**Mode of study:** Full-time

**Level of study:** Postgraduate research

**Figure B31: Sector overall rate = 96.5%**



**Sector median (unweighted): 95.7%**

**Sector weighted median: 96.7%**

**Recommended starting point before adjustment: 95%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Considers the starting point used for other numerical thresholds and is higher because of the overall high levels of performance.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and have not identified sector-wide contextual factors with larger performance gaps that would mean a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 90 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 90 per cent would result in 10.1 per cent of providers with point estimates below the numerical threshold. These are smaller providers with fewer than 500 students. Thus, 1 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also had regard to the effect that a numerical threshold set at 90 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis has not identified examples where a disproportionately large number of providers would have split indicators where this was the case.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

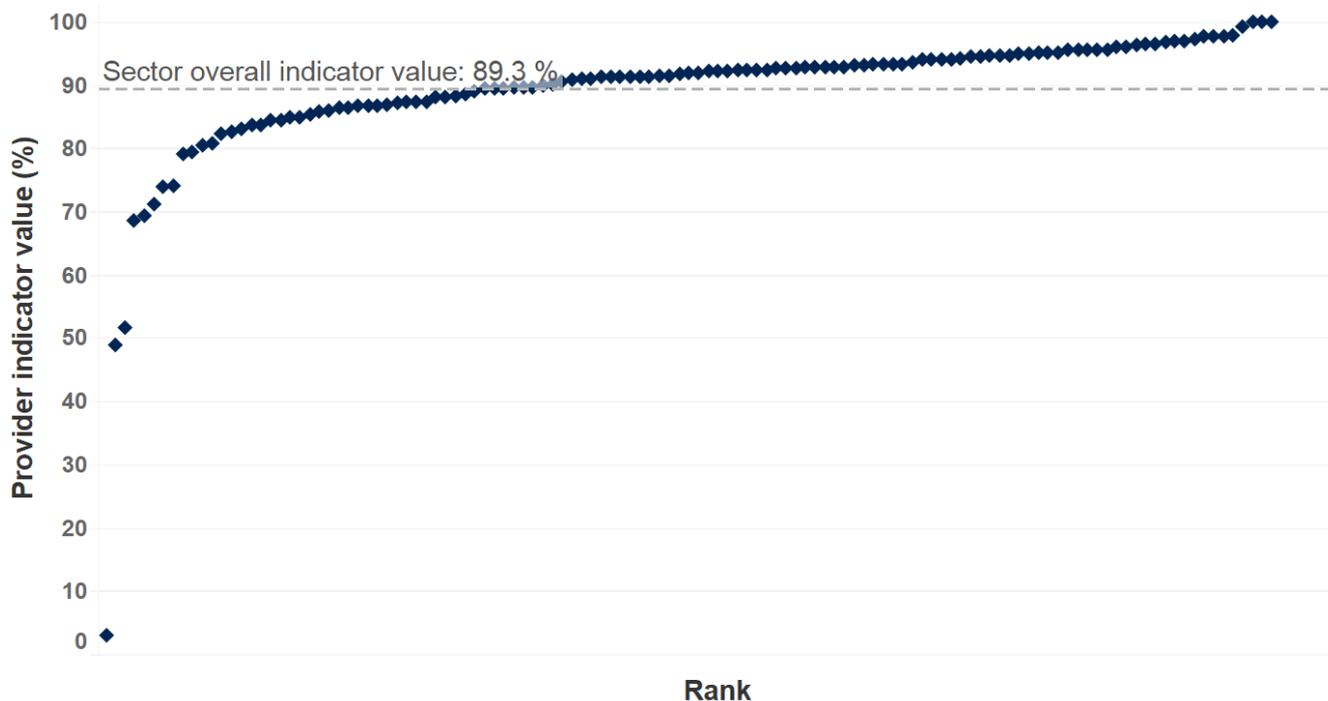
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	11 (10.1%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	930 (1.0%)
<b>Recommended numerical threshold level</b>	90%

## 32. Numerical threshold for: Continuation

**Mode of study:** Full-time

**Level of study:** Other postgraduate

**Figure B32: Sector overall rate = 89.3%**



**Sector median (unweighted):** 92.0%

**Sector weighted median:** 91.1%

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Considers the starting point used for other numerical thresholds at postgraduate level.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and not identified any sector-wide contextual factors with larger performance gaps that would mean a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 85 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 85 per cent would result in 17.4 per cent of providers with point estimates below the numerical threshold. Thus, 13.2 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 31 providers (35.6 per cent).
- The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for 12 providers (32.4 per cent).
- There are other split indicators that suggest a higher proportion of point estimates below a numerical threshold of 85 per cent, but these split indicators have fewer than 10 data points in total. We consider that the relatively small populations for these split indicators are too small to result in reliable judgements.

We therefore considered an alternative numerical threshold of 80 per cent. We considered that a threshold at this level would be more appropriate.

- 8.3 per cent of providers have a point estimate below a numerical threshold of 80 per cent. 9.1 per cent of students would be studying at providers with point estimates below a numerical threshold set at 80 per cent. There is a risk that a numerical threshold of 80 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 80 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 20 per cent of students not continuing on their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not continuing with their courses and that a threshold below this level may not afford an appropriate level of protection to students.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	10 (8.3%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	4,860 (9.1%)
<b>Recommended numerical threshold level</b>	80%

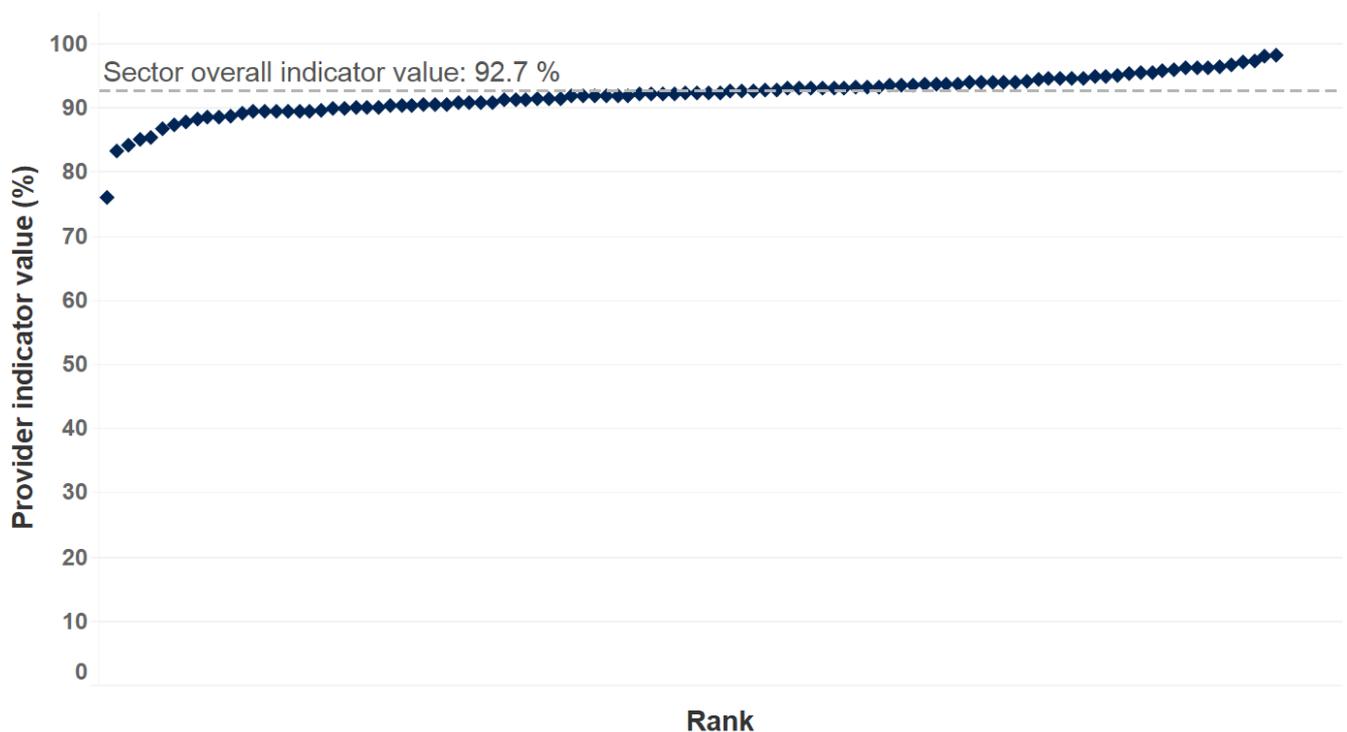
# Numerical thresholds for completion – cohort tracking: Full-time postgraduate

## 33. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Full-time

**Level of study:** PGCE

**Figure B33: Sector overall rate = 92.7%**



**Sector median (unweighted):** 92.4%

**Sector weighted median:** 92.8%

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator as per our stated policy intention.
- Consistent with starting point used for other indicators at PGCE level.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).

- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and have not identified any sector-wide contextual factors with larger performance differences that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in 2.9 per cent of providers with point estimates below the numerical threshold. These are smaller providers with fewer than 500 students altogether. Thus, 0.4 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 39 providers (43.8 per cent).
  - The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for five providers (20.8 per cent).
  - The point estimate for ‘Disability type – sensory, physical or medical impairment’ would be below the numerical threshold for six providers (27.3 per cent).

We note that the population for these groups are relatively small compared with the overall population for this indicator. We have already considered these characteristics in our use of sector performance data and Exploring Student Outcomes analysis, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for undergraduate provision may not be sufficient for PGCE provision. However, we

have set out our mechanisms for considering the context for any provider when making a decision about compliance. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

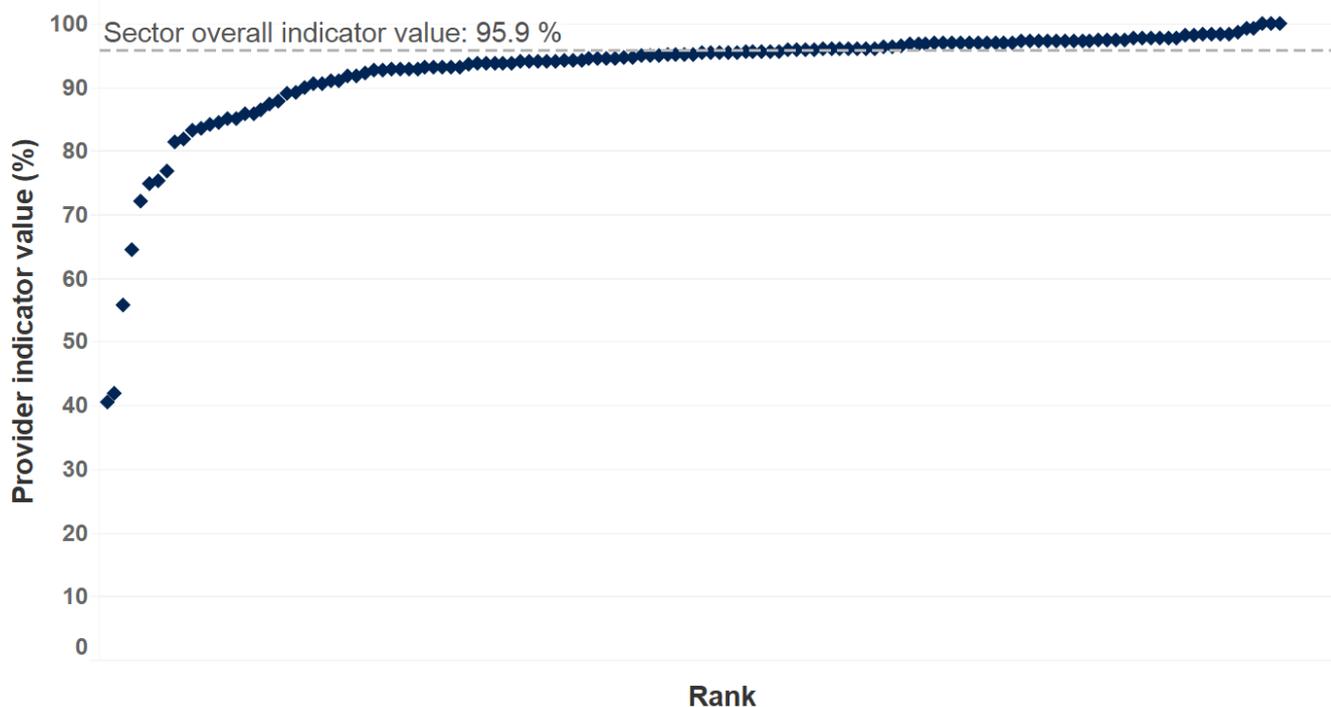
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	3 (2.9%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	370 (0.4%)
<b>Recommended numerical threshold level</b>	85%

## 34. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Full-time

**Level of study:** Postgraduate taught masters

**Figure B34: Sector overall rate = 95.9%**



**Sector median (unweighted):** 95.3%

**Sector weighted median:** 97.0%

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as set out in our policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Consistent with recommended starting point for other indicators at postgraduate level.
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in 10.2 per cent of providers with point estimates below the numerical threshold. Thus, 1.7 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis has not identified examples where a disproportionately large number of providers would have split indicators where this was the case.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we have also considered the consistency of this proposed numerical threshold with other proposed thresholds for this mode and level of study. We note that we have proposed a numerical threshold level of 80 per cent for both the continuation and completion (compound) indicators. We consider there is a risk of inconsistency in proposing a numerical threshold of 85 per cent for this indicator as we do not think that takes sufficient account of the likelihood of students leaving their studies at a later stage.

On balance, we therefore consider that a numerical threshold of 80 per cent would be most appropriate in this instance.

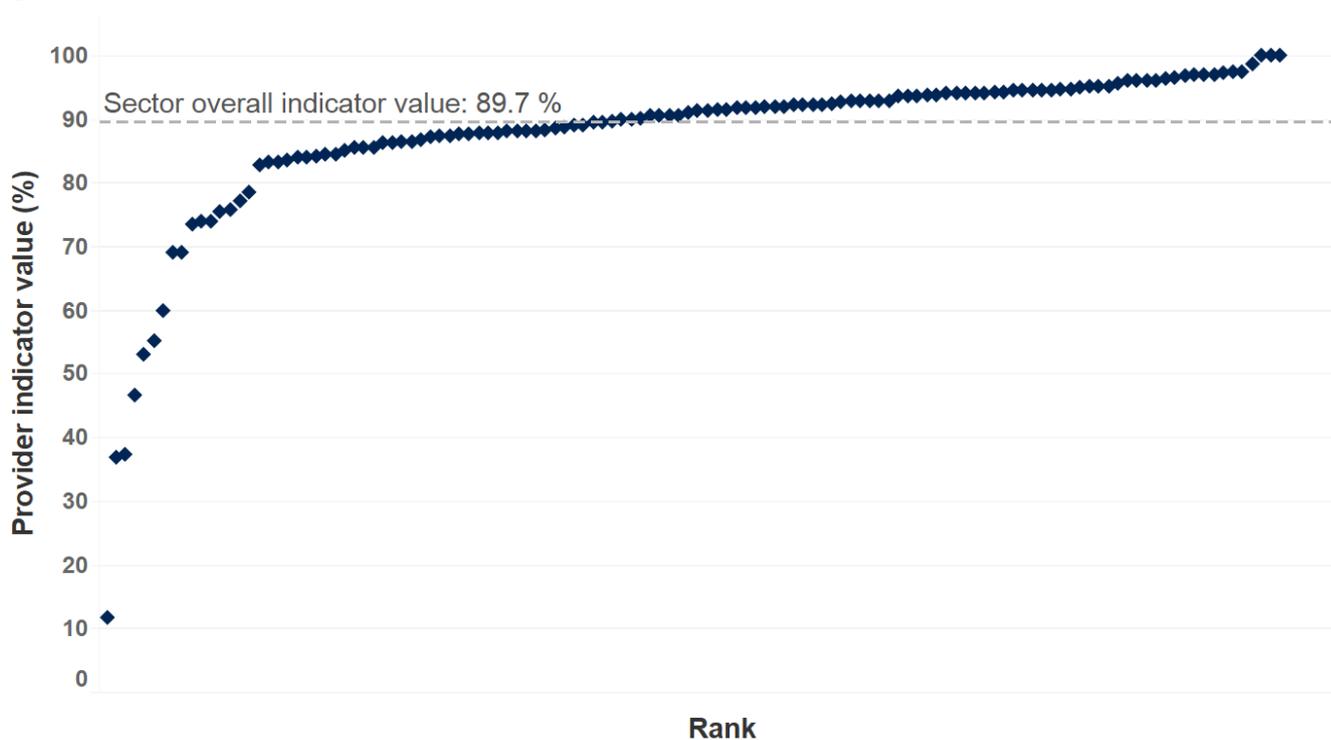
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	8 (5.8%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	2,360 (0.5%)
<b>Recommended numerical threshold level</b>	80%

## 35. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Full-time

**Level of study:** Other postgraduate

**Figure B35: Sector overall rate = 89.7%**



**Sector median (unweighted):** 91.3%

**Sector weighted median:** 90.0 %

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as set out in our policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Consistent with recommended starting point for other indicators at postgraduate level.
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 85 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 85 per cent would result in 20.2 per cent of providers with point estimates below the numerical threshold. These are smaller providers with fewer than 500 students. Thus, 6.7 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 35 providers (40.2 per cent).
- The point estimate for ‘IMD quintile – Q1 or Q2’ would be below the numerical threshold for 23 providers (30.3 per cent).
- The point estimate for ‘Ethnicity – Asian’ would be below the numerical threshold for 16 providers (35.6 per cent).
- The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for 14 providers (46.7 per cent).
- The point estimate for ‘Disability reported’ would be below the numerical threshold for 17 providers (31.5 per cent).

We therefore considered an alternative numerical threshold of 80 per cent. We considered that a threshold at this level would be more appropriate.

- 12.9 per cent of providers have a point estimate below a numerical threshold of 80 per cent. 2.7 per cent of students would be studying at providers with point estimates below a numerical threshold set at 80 per cent. There is a risk that a numerical threshold of 80 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 80 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 20 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

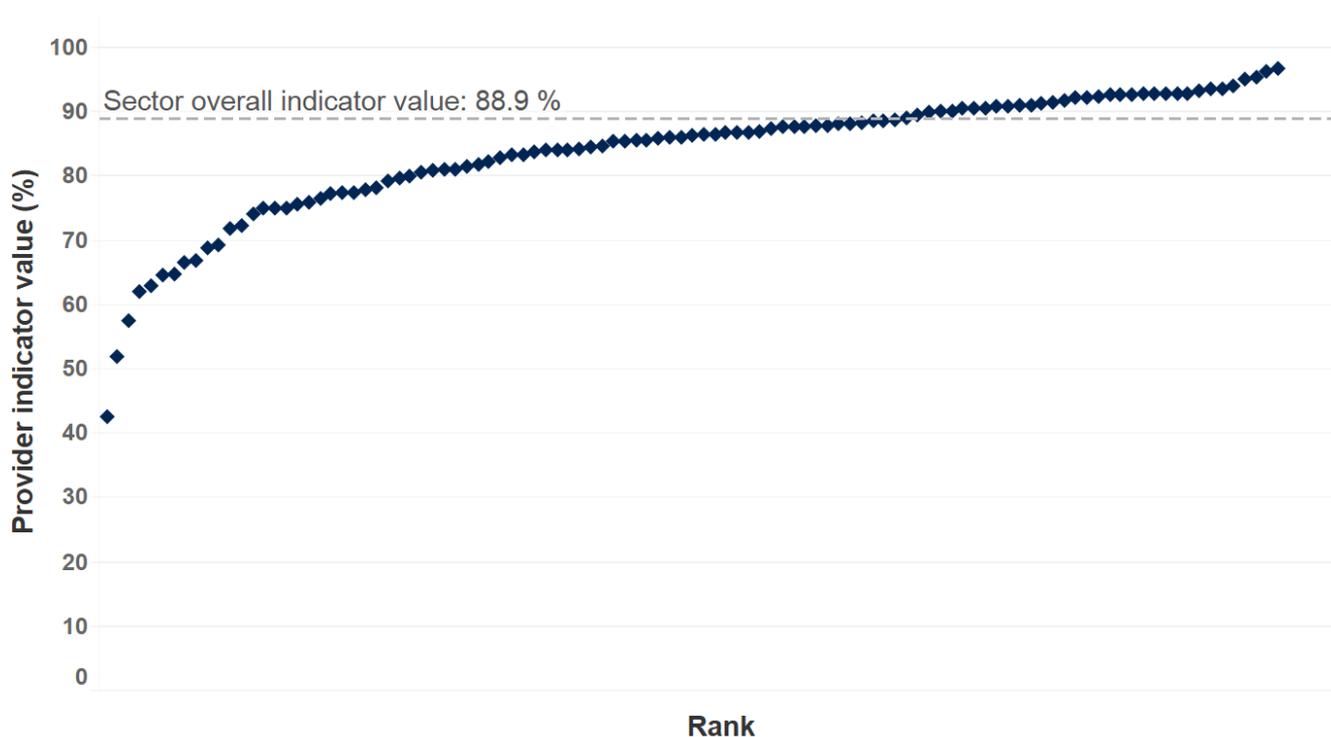
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	16 (12.9%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	1,250 (2.7%)
<b>Recommended numerical threshold level</b>	80%

## 36. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Full-time

**Level of study:** Postgraduate research

**Figure B36: Sector overall rate = 88.9%**



**Sector median (unweighted): 86.3%**

**Sector weighted median: 91.0 %**

**Recommended starting point before adjustment: 85%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as set out in our policy intention. We have particularly considered the unweighted sector median for this indicator because of the influence of some very high-performing, large providers for this indicator that may be disproportionately influencing the sector overall rate and weighted median levels.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 80 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 80 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 80 per cent would result in 26.7 per cent of providers with point estimates below the numerical threshold. The majority of these are smaller providers with fewer than 500 students. Thus, 9.6 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 80 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 33 providers (36.3 per cent).
- The point estimate for ‘Disability type – mental health condition’ would be below the numerical threshold for four providers (36.4 per cent).
- The point estimate for ‘Disability type – sensory, medical or physical impairments’ would be below the numerical threshold for five providers (31.3 per cent).

We therefore considered an alternative numerical threshold of 75 per cent. We considered that a threshold at this level would be more appropriate.

- 14.3 per cent of providers have a point estimate below a numerical threshold of 75 per cent. 5.0 per cent of students would be studying at providers with point estimates below a numerical threshold set at 75 per cent. There is a risk that a numerical threshold of 75 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 75 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 25 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimate below adjusted numerical threshold</b>	15 (14.3%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	4,420 (5.0%)
<b>Recommended threshold level</b>	75%

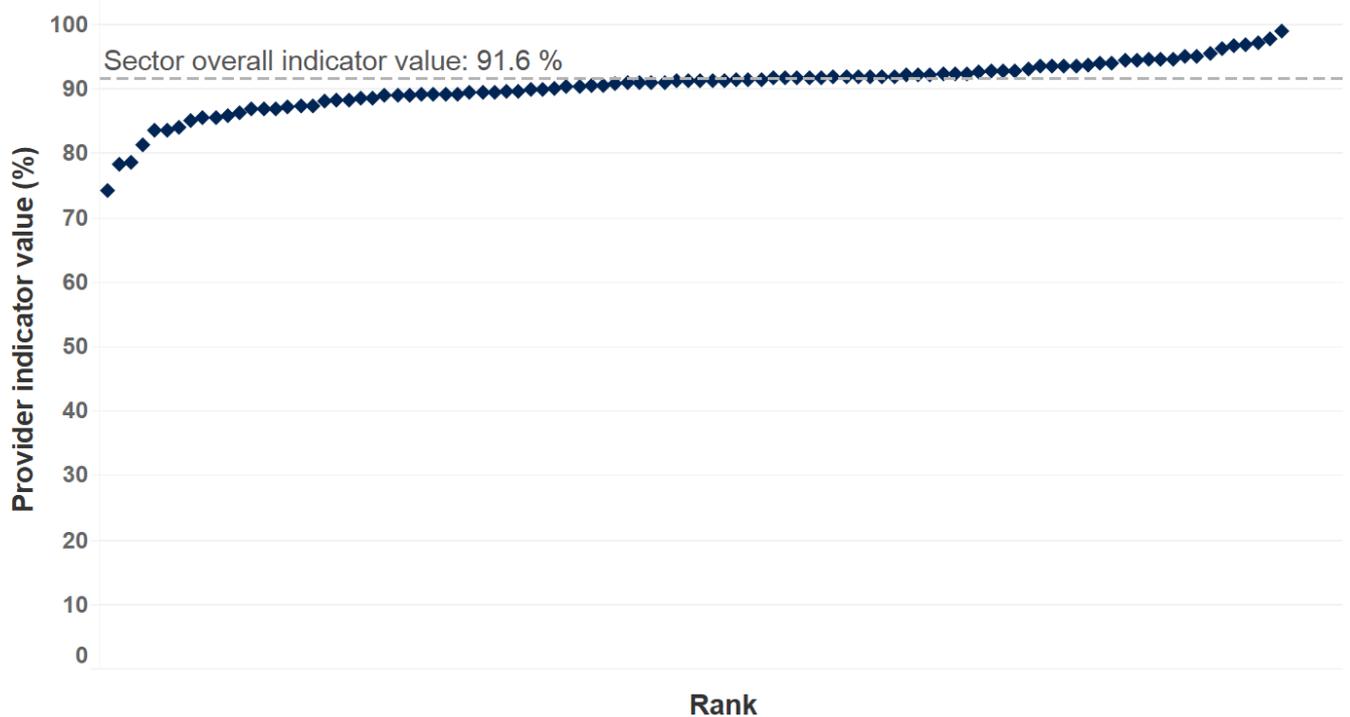
# Numerical thresholds for completion – compound indicator: Full-time postgraduate

## 37. Numerical threshold for: Completion – compound indicator

**Mode of study:** Full-time

**Level of study:** PGCE

**Figure B37: Sector overall rate = 91.6%**



**Sector median (unweighted):** 91.4%

**Sector weighted median:** 91.9%

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator.
- Consistent with starting point used for other indicators at PGCE level.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).

- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in 7.1 per cent of providers with point estimates below the numerical threshold. The majority of these are smaller providers with fewer than 500 students. Thus, 1.2 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for 'Age on entry – 31 years and over' would be below the numerical threshold for 32 providers (39.5 per cent).
  - The point estimate for 'Disability reported' would be below the numerical threshold for 18 providers (25.4 per cent).

We note that the population for these groups are relatively small compared with the overall population for this indicator. We have already considered these characteristics in our use of sector performance data and Exploring Student Outcomes analysis, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for full-time postgraduate provision may not be sufficient for PGCE provision. However, we have set out our mechanisms for considering the context for any provider when

making a decision about compliance. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

- We note that benchmarking data is not available for this level of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

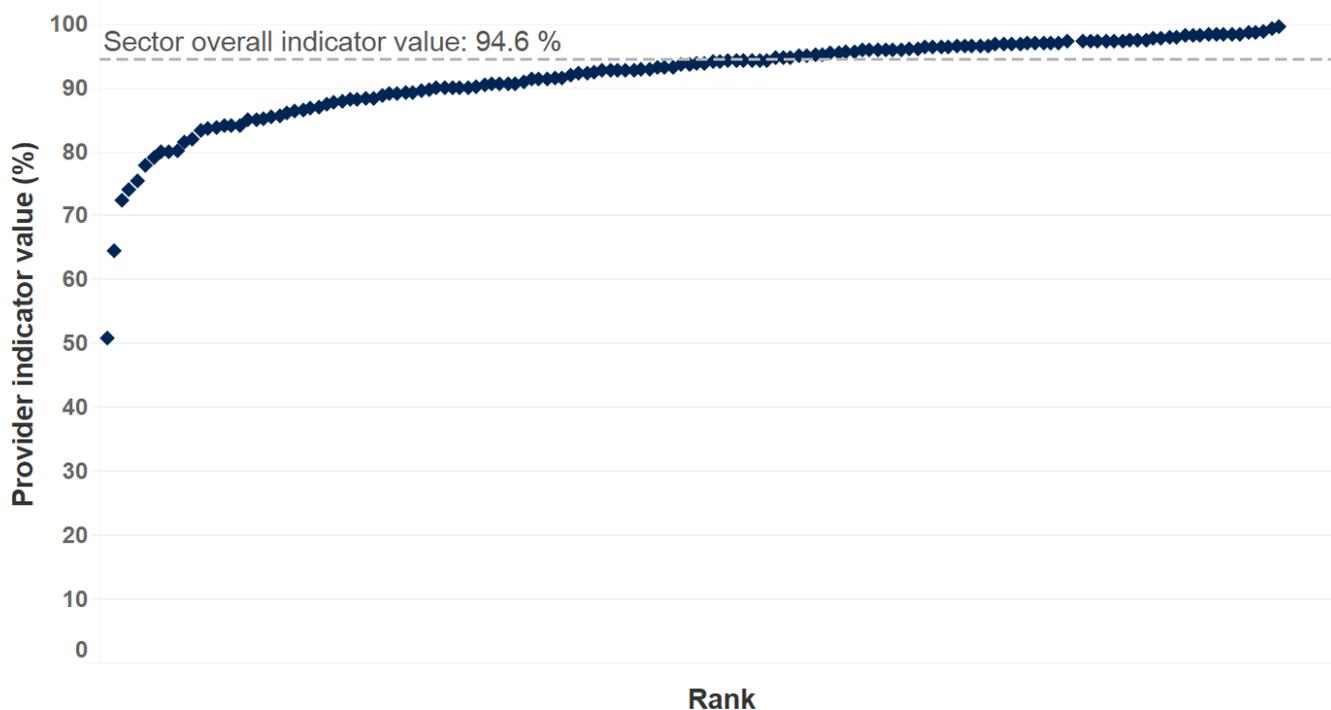
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	7 (7.1%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	980 (1.2%)
<b>Recommended numerical threshold level</b>	85%

## 38. Numerical threshold for: Completion – compound indicator

**Mode of study:** Full-time

**Level of study:** Postgraduate taught masters

**Figure B38: Sector overall rate = 94.6%**



**Sector median (unweighted):** 93.7%

**Sector weighted median:** 96.4 %

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as set out in our policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Consistent with recommended starting point for other indicators at postgraduate level.
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in 12 per cent of providers with point estimates below the numerical threshold. Thus, 3.5 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 85 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 42 providers (33.9 per cent).
- The point estimate for ‘IMD quintile – Q1 or Q2’ would be below the numerical threshold for 38 providers (31.1 per cent).
- The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for 43 providers (44.8 per cent).
- The point estimate for ‘Disability type – mental health condition’ would be below the numerical threshold for 34 providers (41.0 per cent).
- The point estimate for ‘POLAR quintile – Q1 or Q2’ would be below the numerical threshold for 32 providers (27.1 per cent).

We therefore considered an alternative numerical threshold of 80 per cent. We considered that a threshold at this level would be more appropriate.

- 6 per cent of providers have a point estimate below a numerical threshold of 80 per cent. 1.9 per cent of students would be studying at providers with point estimates below a numerical threshold set at 80 per cent. There is a risk that a numerical threshold of 80 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 80 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 20 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

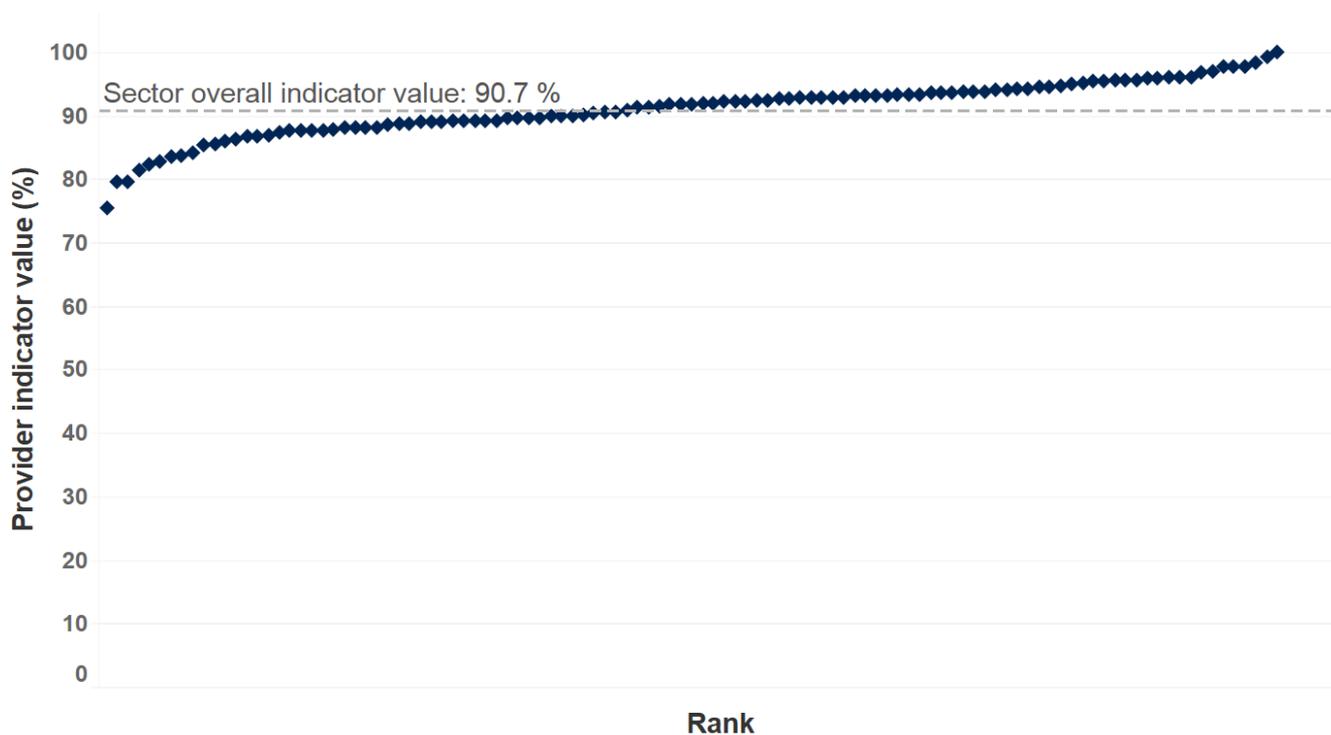
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	9 (6.0%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	11,390 (1.9%)
<b>Recommended numerical threshold level</b>	80%

### 39. Numerical threshold for: Completion – compound indicator

**Mode of study:** Full-time

**Level of study:** Other postgraduate

**Figure B39: Sector overall rate = 90.7%**



**Sector median (unweighted):** 91.9%

**Sector weighted median:** 90.8 %

**Recommended starting point before adjustment:** 90%

#### **Reason for recommended starting point**

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as set out in our policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Consistent with recommended starting point for other indicators at postgraduate level.
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in 8.3 per cent of providers with point estimates below the numerical threshold. The majority of these are smaller providers with fewer than 500 students. Thus, 3.6 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 85 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Age in entry – 31 years and over’ would be below the numerical threshold for 25 providers (32.1 per cent).
- The point estimate for ‘Ethnicity – Asian’ would be below the numerical threshold for 11 providers (24.4 per cent).
- The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for 12 providers (34.3 per cent).
- The point estimate for ‘Disability reported’ would be below the numerical threshold for 16 providers (30.2 per cent).

We therefore considered an alternative numerical threshold of 80 per cent. We considered that a threshold at this level would be more appropriate.

- 2.8 per cent of providers have a point estimate below a numerical threshold of 80 per cent. 1.0 per cent of students would be studying at providers with point estimates below a numerical threshold set at 80 per cent. There is a risk that a numerical threshold of 80 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 80 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 20 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

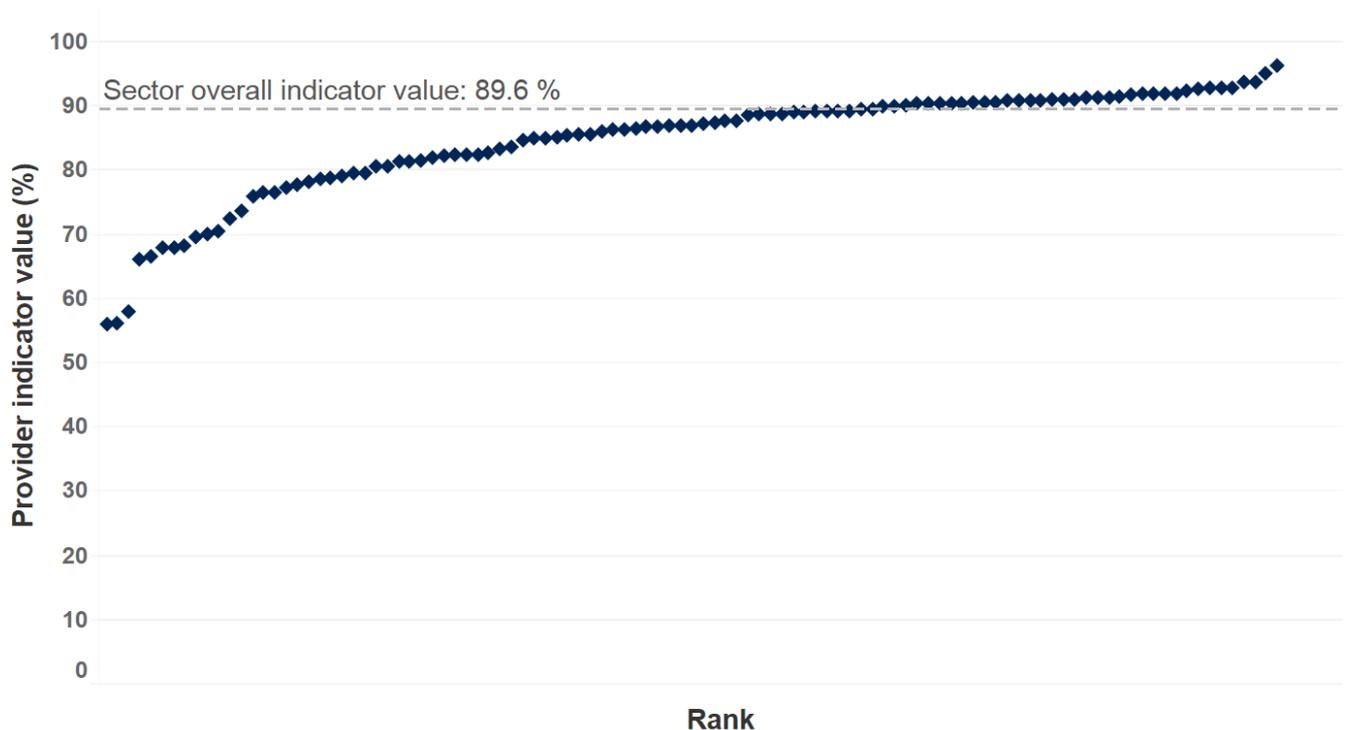
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	3 (2.8%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	530 (1.0%)
<b>Recommended numerical threshold level</b>	80%

## 40. Numerical threshold for: Completion – compound indicator

**Mode of study:** Full-time

**Level of study:** Postgraduate research

**Figure B40: Sector overall rate = 89.6%**



**Sector median (unweighted): 87.1%**

**Sector weighted median: 90.9%**

**Recommended starting point before adjustment: 85%**

### Reason for recommendation

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as set out in our policy intention. We have particularly considered the unweighted sector median for this indicator because of the influence of some very high-performing, large providers for this indicator that may be disproportionately influencing the sector overall rate and weighted median levels.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 80 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 80 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 80 per cent would result in 22.9 per cent of providers with point estimates below the numerical threshold. The majority of these are smaller providers with fewer than 500 students. Thus, 4.9 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 80 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 29 providers (31.9 per cent).
- The point estimate for ‘Disability type – mental health condition’ would be below the numerical threshold for six providers (31.6 per cent).

We therefore considered an alternative numerical threshold of 75 per cent. We considered that a threshold at this level would be more appropriate.

- 12.4 per cent of providers have a point estimate below a numerical threshold of 75 per cent. 2.3 per cent of students would be studying at providers with point estimates below a numerical threshold set at 75 per cent. There is a risk that a numerical threshold of 75 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 75 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 25 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	13 (12.4%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	2,130 (2.3%)
<b>Recommended numerical threshold level</b>	75%

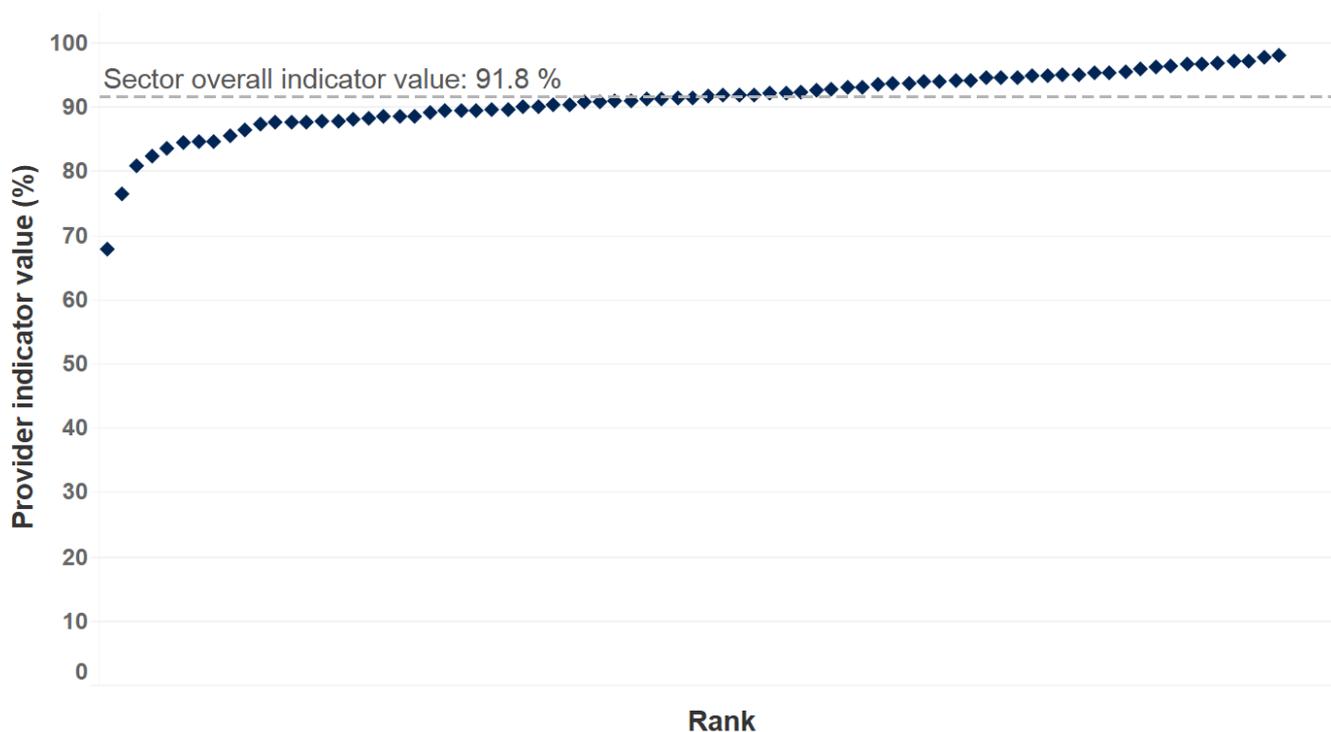
# Numerical thresholds for progression: Full-time postgraduate

## 41. Numerical threshold for: Progression

**Mode of study:** Full-time

**Level of study:** PGCE

**Figure B41: Sector overall rate = 91.8%**



**Sector median (unweighted):** 91.6%

**Sector weighted median:** 91.8%

**Recommended starting point before adjustment:** 90%

### Reason for recommendation

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Consistent with starting point used for other indicators at PGCE level.

- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in 10.4 per cent of providers with point estimates below the numerical threshold. Thus, 4.9 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that, in some instances, a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for 'Ethnicity – Asian' would be below the numerical threshold for eight providers (26.7 per cent).
  - The point estimate for 'Ethnicity – Black' would be below the numerical threshold for three providers (33.3 per cent), noting that there are fewer than 10 data points for this split indicator.
  - The point estimate for 'Disability reported' would be below the numerical threshold for nine providers (20.0 per cent).

We note that the population for these groups are relatively small compared with the population for the indicator as a whole. We have already considered these characteristics in our use of sector performance data and Exploring Student Outcomes analysis, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for full-time postgraduate provision may not be sufficient for PGCE provision.

However, we have set out our mechanisms for considering the context for any provider when making a decision about compliance. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

- We note that benchmarking data is not available for postgraduate levels of study, and therefore it has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- We have noted that the use of survey data for this indicator results in a greater degree of statistical uncertainty around the data for individual providers, especially for smaller providers. We have considered mechanisms for taking account of greater statistical uncertainty in the data in Proposal 6 of the consultation, and do not propose to make additional adjustments to the numerical threshold to take further account of this at a sector level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

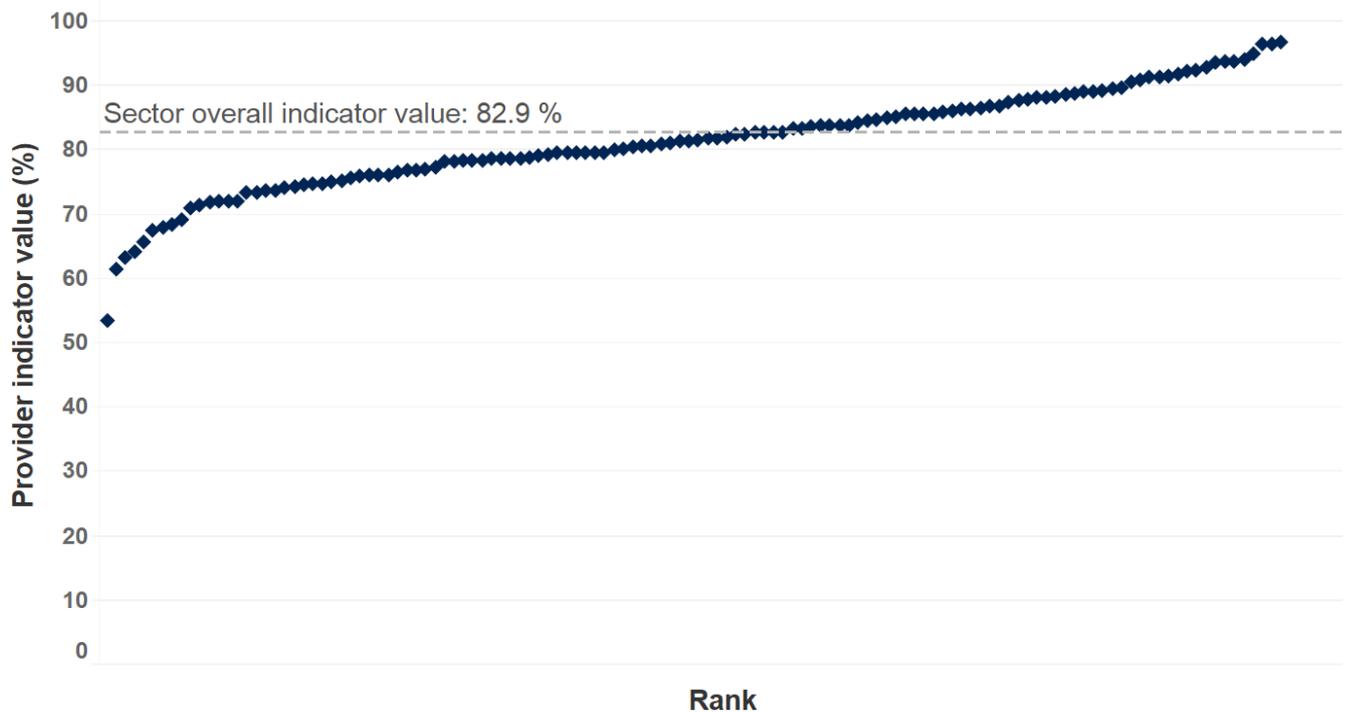
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	8 (10.4%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	970 (4.9%)
<b>Recommended numerical threshold level</b>	85%

## 42. Numerical threshold for: Progression

**Mode of study:** Full-time

**Level of study:** Postgraduate taught masters

**Figure B42: Sector overall rate = 82.9%**



**Sector median (unweighted): 81.5%**

**Sector weighted median: 83.5%**

**Recommended starting point before adjustment: 80%**

### Reason for recommendation

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.
- We have, however, noted that the weighted median graduate outcome rates for agriculture, food and related studies and for general, applied and forensic sciences falls below the proposed 5 percentage points downward adjustment for full-time postgraduate provision. Students studying in this subject area account for less than 1 per cent of the student population for this indicator. We propose to take account of the impact that differences in subject area may have on a provider's performance, depending on the subjects it offers, through the mechanisms we have set out for considering contextual factors.

Analysis suggests a numerical threshold of 75 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have noted that the use of survey data for this indicator results in a greater degree of statistical uncertainty around the data for individual providers, especially for smaller providers. We have considered mechanisms for taking account of greater statistical uncertainty in the data in Proposal 6 of the consultation, and do not propose to make additional adjustments to the numerical threshold to take further account of this at a sector level.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 75 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 75 per cent would result in 19 per cent of providers with point estimates below the numerical threshold. Thus, 10.1 per cent of students

would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.

- We have also had regard to the effect that a numerical threshold set at 75 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘IMD quintile – Q1 or Q2’ would be below the numerical threshold for 30 providers (28 per cent).
  - The point estimate for ‘Ethnicity – Asian’ would be below the numerical threshold for 20 providers (29.4 per cent).
  - The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for 25 providers (37.3 per cent).
  - The point estimate for ‘Disability reported’ would be below the numerical threshold for 25 providers (28.1 per cent).
  - The point estimate for ‘POLAR quintile – Q1 or Q2’ would be below the numerical threshold for 26 providers (28 per cent).

We therefore considered an alternative numerical threshold of 70 per cent. We considered that a threshold at this level would be more appropriate.

- 7.1 per cent of providers have a point estimate below a numerical threshold of 70 per cent. 2.3 per cent of students would be studying at providers with point estimates below a numerical threshold set at 70 per cent. There is a risk that a numerical threshold of 70 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 70 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 30 per cent of students not progressing to positive outcomes from their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not progressing to positive outcomes and that a threshold below this level may not afford an appropriate level of protection to students.

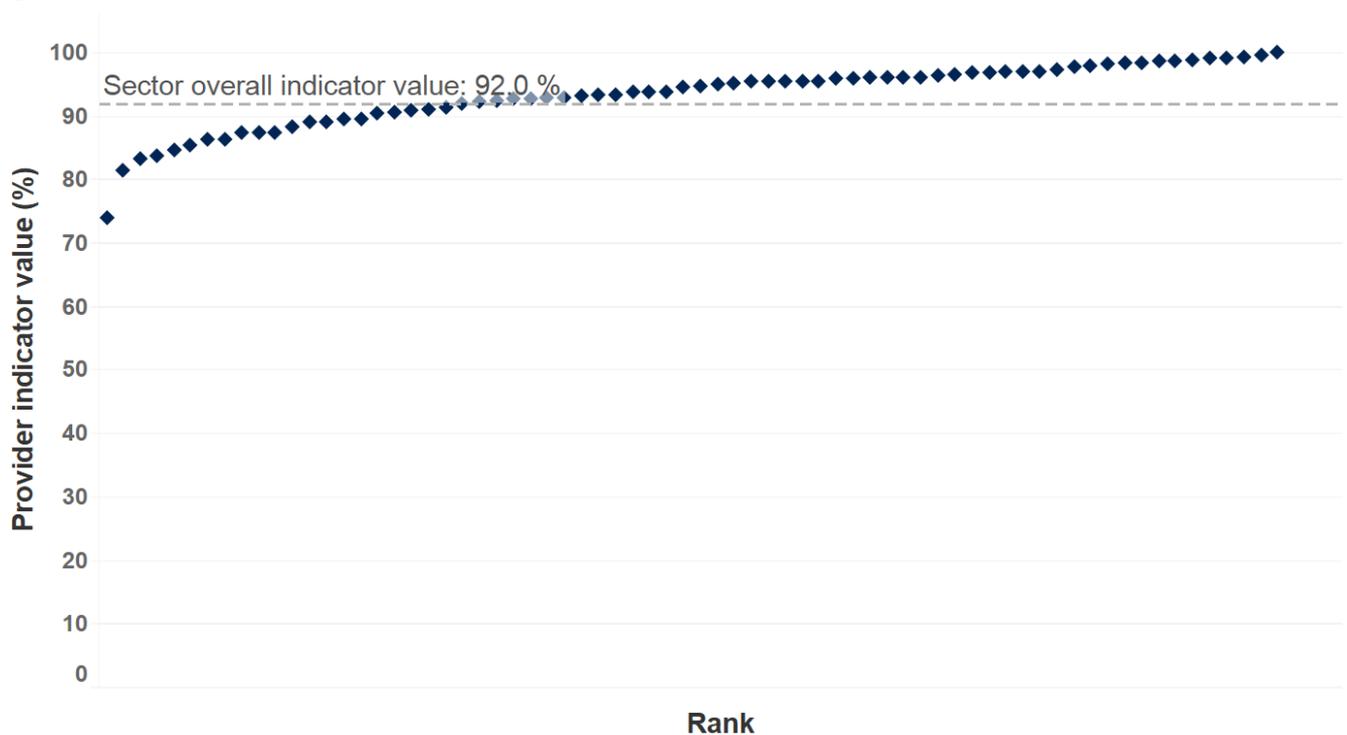
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	9 (7.1%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	1,190 (2.3%)
<b>Recommended numerical threshold level</b>	70%

## 43. Numerical threshold for: Progression

**Mode of study:** Full-time

**Level of study:** Other postgraduate

**Figure B43: Sector overall rate = 92.0%**



**Sector median (unweighted):** 94.7%

**Sector weighted median:** 93.0%

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and have not identified sector-wide contextual factors that demonstrate larger performance gaps that would indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in 7.1 per cent of providers with point estimates below the numerical threshold. Thus, 14.5 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis has not identified examples where a disproportionately large number of providers would have split indicators where this was the case.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- We have noted that the use of survey data for this indicator results in a greater degree of statistical uncertainty around the data for individual providers, especially for smaller providers. We have considered mechanisms for taking account of greater statistical uncertainty in the data in Proposal 6 of the consultation, and do not propose to make additional adjustments to the numerical threshold to take further account of this at a sector level.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	5 (7.1%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	1,340 (14.5%)
<b>Recommended numerical threshold level</b>	85%

## 44. Numerical threshold for: Progression

**Mode of study:** Full-time

**Level of study:** Postgraduate research

**Figure B44: Sector overall rate = 93.5%**



**Sector median (unweighted):** 94.2%

**Sector weighted median:** 94.7%

**Recommended starting point before adjustment:** 90%

### Reason for recommendation

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Considers the starting point used for other numerical thresholds at postgraduate level.
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for full-time postgraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in 8.3 per cent of providers with point estimates below the numerical threshold. Thus, 2.0 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis has not identified examples where a disproportionately large number of providers would have split indicators where this was the case.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- We have noted that the use of survey data for this indicator results in a greater degree of statistical uncertainty around the data for individual providers, especially for smaller providers. We have considered mechanisms for taking account of greater statistical uncertainty in the data in Proposal 6 of the consultation, and do not propose to make additional adjustments to the numerical threshold to take further account of this at a sector level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	6 (8.3%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	240 (2.0%)
<b>Recommended numerical threshold level</b>	85%

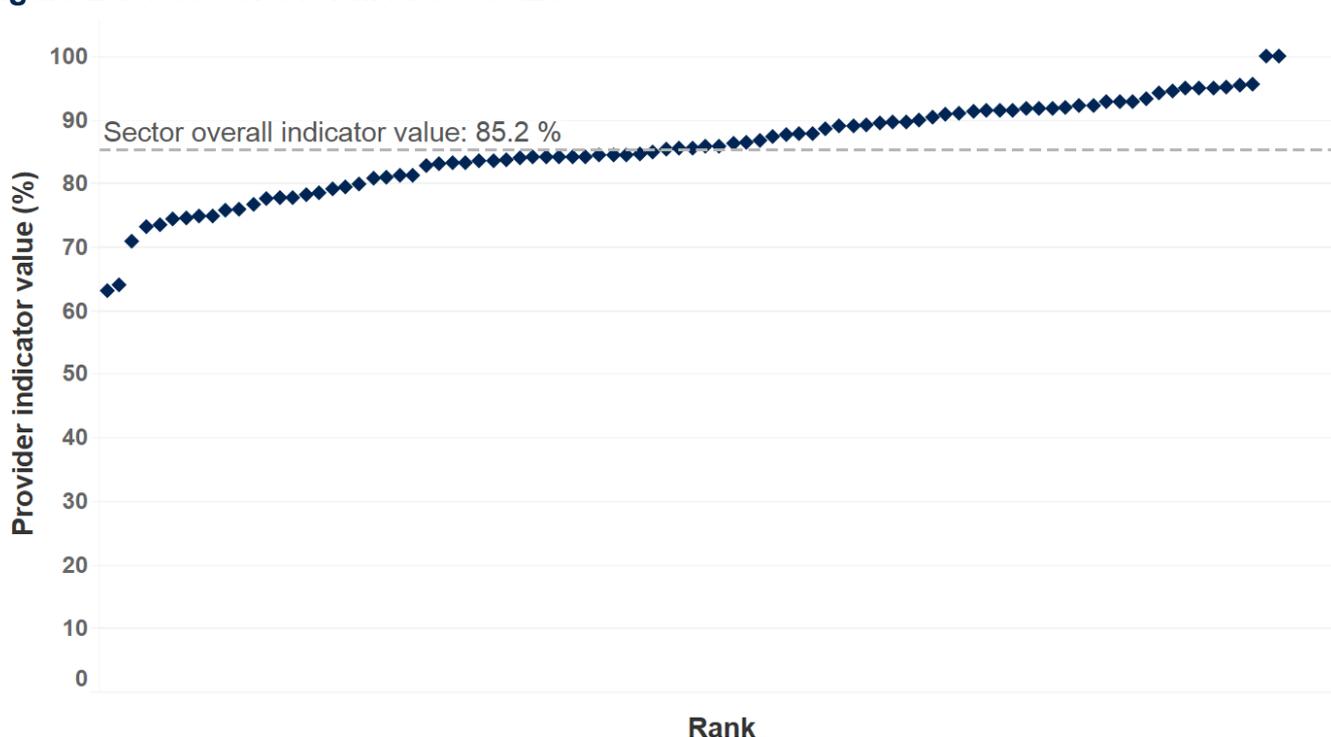
## Numerical thresholds for continuation: Part-time postgraduate

### 45. Numerical threshold for: Continuation

**Mode of study:** Part-time

**Level of study:** PGCE

**Figure B45: Sector overall rate = 85.2%**



**Sector median (unweighted):** 85.7%

**Sector weighted median:** 85.6%

**Recommended starting point before adjustment:** 85%

#### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have not identified sector-wide contextual factors with larger performance gaps that would mean a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 80 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 80 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 80 per cent would result in 22.5 per cent of providers with point estimates below the numerical threshold. The majority of these are smaller providers with fewer than 500 students. Thus, 17.9 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 80 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Age on entry – 31 years and over’ would be below the numerical threshold for 19 providers (33.9 per cent).
- The point estimate for ‘Disability reported’ would be below the numerical threshold for four providers (44.4 per cent).
- The point estimate for ‘Sex – male’ would be below the numerical threshold for 11 providers (31.4 per cent).

We therefore considered an alternative numerical threshold of 75 per cent. We considered that a threshold at this level would be more appropriate.

- 10.1 per cent of providers have a point estimate below a numerical threshold of 75 per cent. 5.3 per cent of students would be studying at providers with point estimates below a numerical threshold set at 75 per cent. There is a risk that a numerical threshold of 75 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 75 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 25 per cent of students not continuing on their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not continuing with their courses and that a threshold below this level may not afford an appropriate level of protection to students.

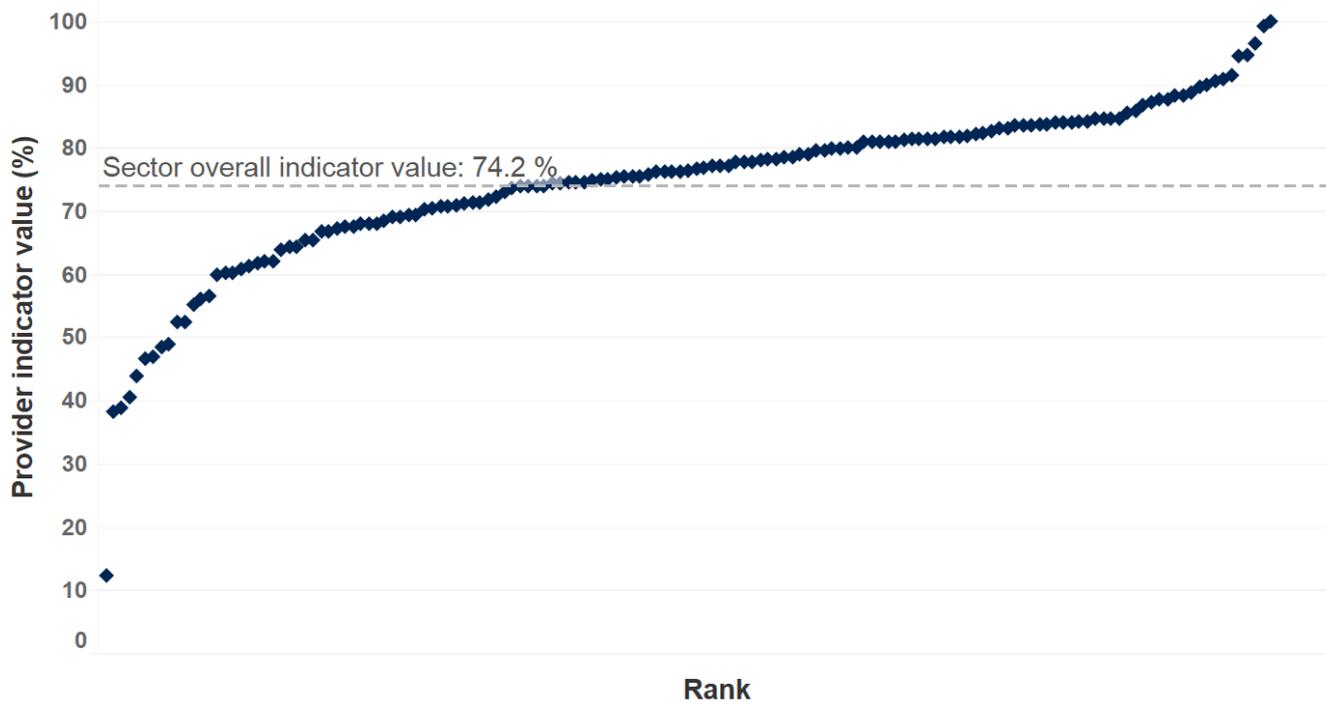
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	9 (10.1%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	430 (5.3%)
<b>Recommended numerical threshold level</b>	75%

## 46. Numerical threshold for: Continuation

**Mode of study:** Part-time

**Level of study:** Postgraduate taught masters

**Figure B46: Sector overall rate = 74.2%**



**Sector median (unweighted): 76.5%**

**Sector weighted median: 75.9%**

**Recommended starting point before adjustment: 75%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have identified that most sector-wide contextual factors do not indicate larger performance gaps that would mean a larger adjustment would be recommended for this indicator.
- Our analysis has suggested that there may be larger performance gap for black, UK-domiciled students. The weighted sector median for these students is 67.3 per cent, larger than the proposed 5 percentage points downward adjustment for part-time postgraduate provision. Regression analysis suggests a gap of 10.7 percentage points for black or black British (other) students compared with white UK-domiciled students. However, we note that all black students account for 6.5 per cent of students for this indicator, which limits the likely effect of this gap on an individual providers' performance.

Analysis suggests a numerical threshold of 70 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes indicates some observable differences as a result of particular student characteristics, but this adjustment is sufficient to take account of the likely impact of any observed difference on an individual provider's performance.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 70 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 70 per cent would result in 27 per cent of providers with point estimates below the numerical threshold. Thus, 26 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that

there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.

- We have also had regard to the effect that a numerical threshold set at 70 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for 42 providers (51.2 per cent).
  - The point estimate for ‘Ethnicity – unknown’ would be below the numerical threshold for 25 providers (45.5 per cent)
  - The point estimate for ‘Disability – Mental health condition’ would be below the numerical threshold for 21 providers (50 per cent), as would the point estimate for ‘Disability – other or multiple impairments.’

We therefore considered an alternative numerical threshold of 65 per cent. We considered that a threshold at this level would be more appropriate.

- 17 per cent of providers have a point estimate below a numerical threshold of 65 per cent. 14.9 per cent of students would be studying at providers with point estimates below a numerical threshold set at 65 per cent. There is a risk that a numerical threshold of 65 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 65 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 35 per cent of students not continuing on their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not continuing with their courses and that a threshold below this level may not afford an appropriate level of protection to students.

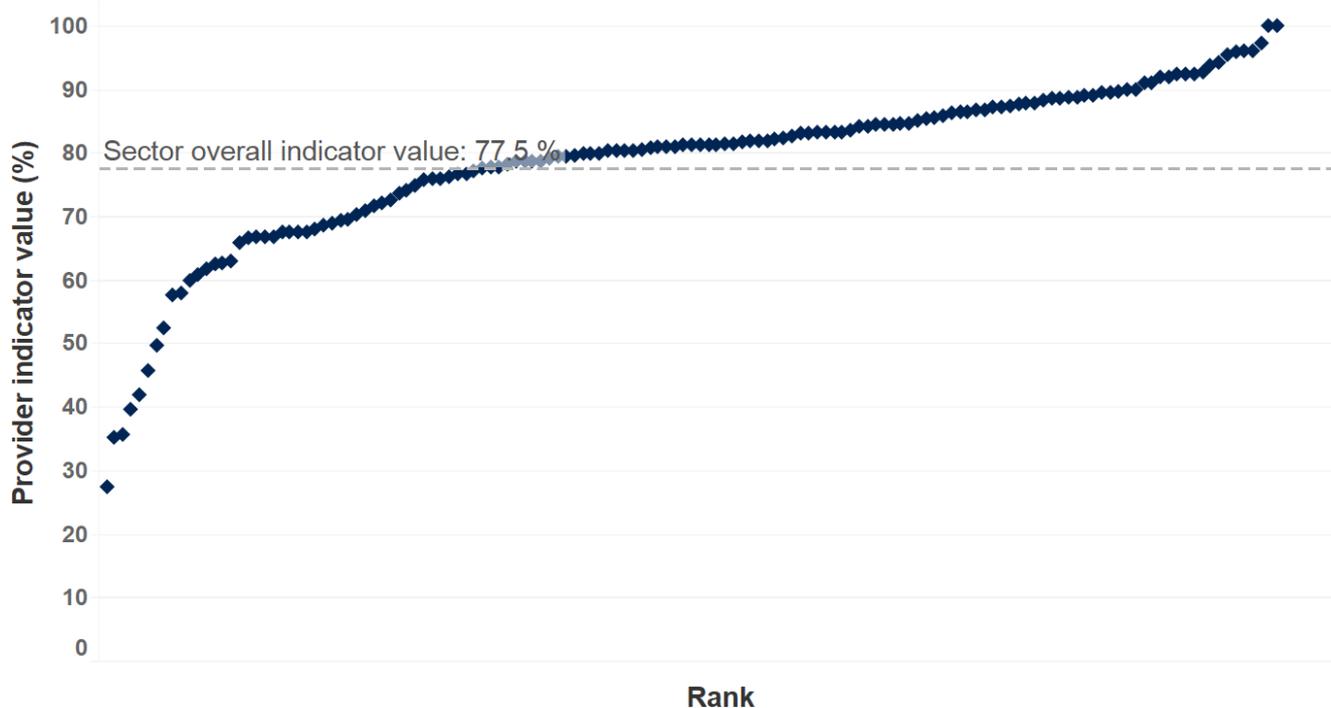
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below recommended threshold level</b>	25 (17.0%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	22,380 (14.9%)
<b>Recommended numerical threshold level</b>	65%

## 47. Numerical threshold for: Continuation

**Mode of study:** Part-time

**Level of study:** Other postgraduate

**Figure B47: Sector overall rate = 77.5%**



**Sector median (unweighted):** 81.4%

**Sector weighted median:** 81.0%

**Recommended starting point before adjustment:** 80%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have identified that most sector-wide contextual factors do not indicate larger performance gaps that would mean a larger adjustment would be recommended for this indicator.
- Our analysis has suggested that there may be larger performance difference for black, UK-domiciled students. The weighted sector median for these students is 68.3 per cent, larger than the proposed 5 percentage points downward adjustment for part-time postgraduate provision. Our Exploring Student Outcomes analysis (see Annex A) suggests a difference of between 13.1 and 8.1 percentage points for black or black British (other) part-time postgraduate students (for all post-graduate study combined) compared with white UK-domiciled students. However, we note that all black students account for less than 5 per cent of students for this indicator, which limits the likely effect of this difference on an individual providers' performance.

Analysis suggests a numerical threshold of 70 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes indicates some observable differences as a result of particular student characteristics, but this adjustment is sufficient to take account of the likely impact of any observed difference on an individual provider's performance.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 70 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 70 per cent would result in 21.3 per cent of providers with point estimates below the numerical threshold. Thus, 21.9 per cent of students

would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.

- We have also had regard to the effect that a numerical threshold set at 70 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for 32 providers (48.5 per cent).
  - The point estimate for ‘Ethnicity – Unknown’ would be below the numerical threshold for 21 providers (36.2 per cent).

We therefore considered an alternative numerical threshold of 65 per cent. We considered that a threshold at this level would be more appropriate.

- 11.3 per cent of providers have a point estimate below a numerical threshold of 65 per cent. 11.2 per cent of students would be studying at providers with point estimates below a numerical threshold set at 65 per cent. There is a risk that a numerical threshold of 65 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 65 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 35 per cent of students not continuing on their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not continuing with their courses and that a threshold below this level may not afford an appropriate level of protection to students.

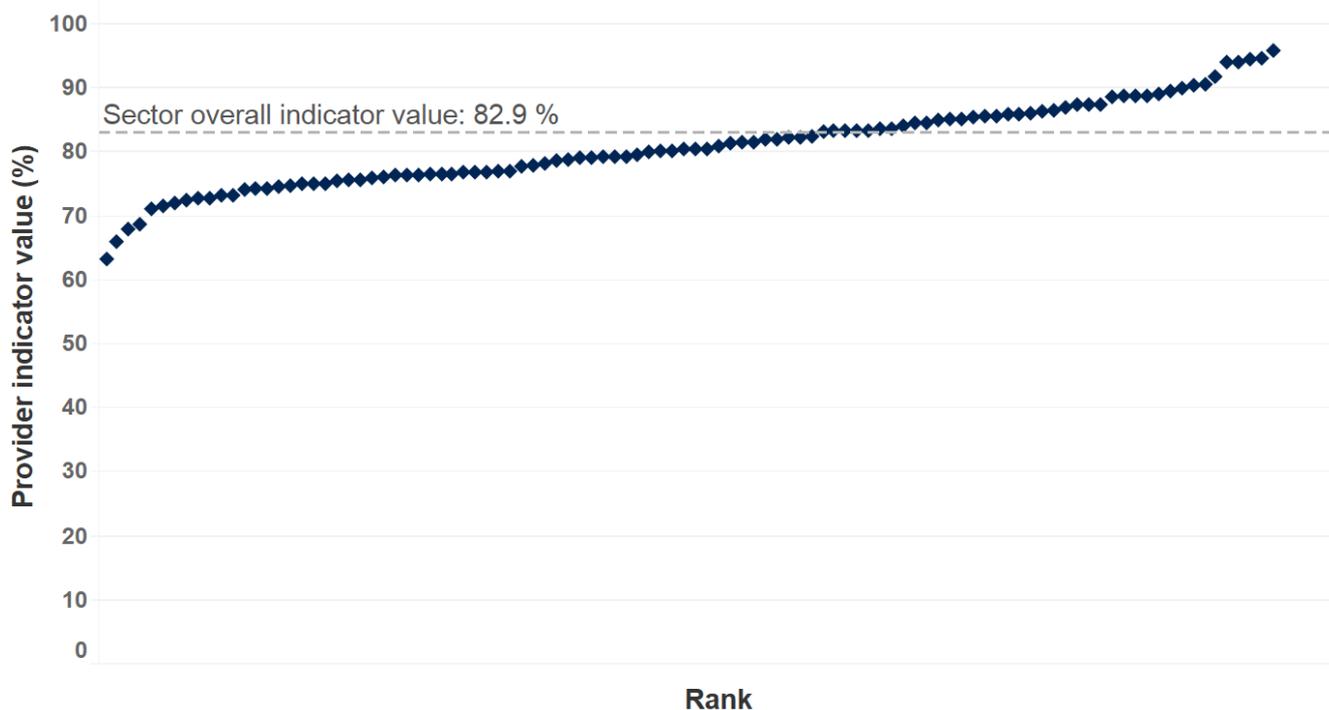
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	15 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	16 (11.3%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	13,910 (11.2%)
<b>Recommended numerical threshold level</b>	65%

## 48. Numerical threshold for: Continuation

**Mode of study:** Part-time

**Level of study:** Postgraduate research

**Figure B48: Sector overall rate = 82.9%**



**Sector median (unweighted): 80.4%**

**Sector weighted median: 83.3%**

**Recommended starting point before adjustment: 80%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have not identified sector-wide contextual factors with larger performance gaps that would mean a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 75 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 75 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 75 per cent would result in 18.6 per cent of providers with point estimates below the numerical threshold. Thus, 14.3 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 75 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Disability reported’ would be below the numerical threshold for 12 providers (41.4 per cent).

We therefore considered an alternative numerical threshold of 70 per cent. We considered that a threshold at this level would be more appropriate.

- 3.9 per cent of providers have a point estimate below a numerical threshold of 70 per cent. 1.6 per cent of students would be studying at providers with point estimates below a numerical threshold set at 70 per cent. There is a risk that a numerical threshold of 80 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 70 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 30 per cent of students not continuing on their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not continuing with their courses and that a threshold below this level may not afford an appropriate level of protection to students.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	4 (3.9%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	320 (1.6%)
<b>Recommended numerical threshold level</b>	70%

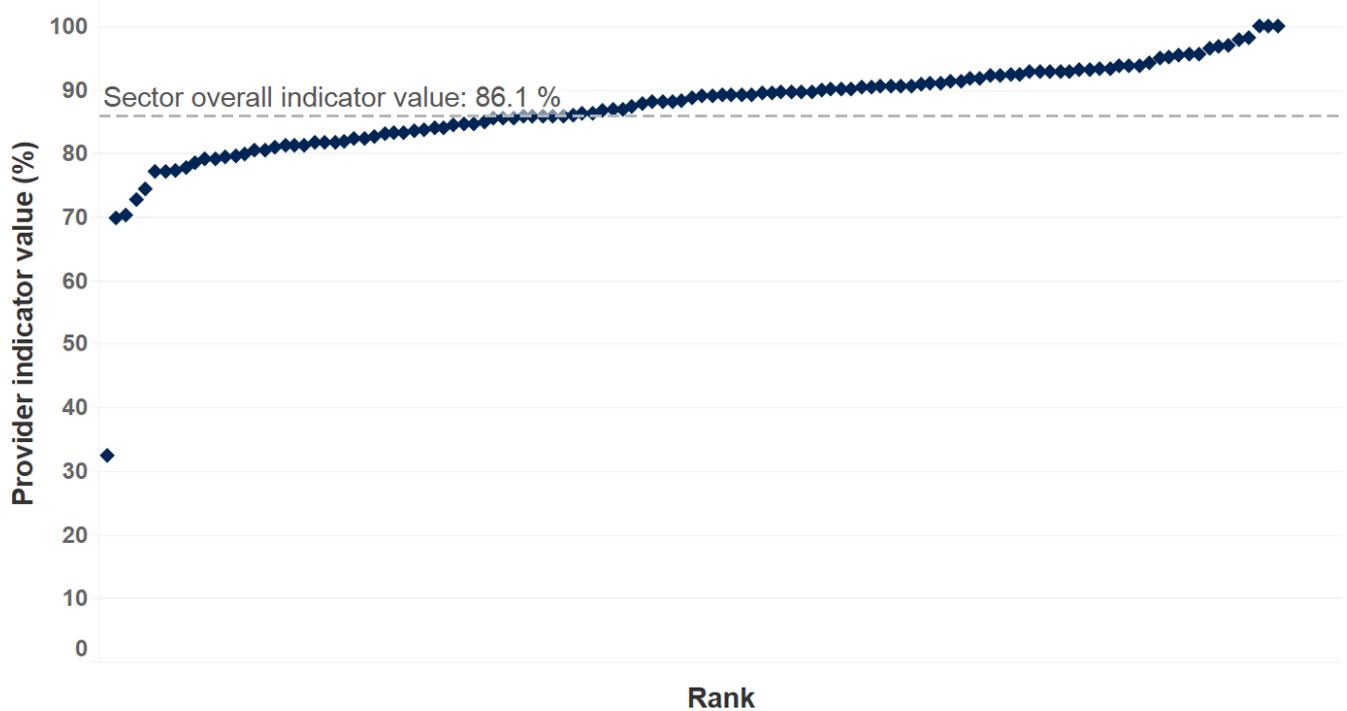
# Numerical thresholds for completion – cohort tracking: Part-time postgraduate

## 49. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Part-time

**Level of study:** PGCE

**Figure B49: Sector overall rate = 86.1%**



**Sector median (unweighted):** 88.9%

**Sector weighted median:** 87.5%

**Recommended starting point before adjustment:** 85%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Considers the starting point used for other indicators at this level of study.

- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have not identified sector-wide contextual factors with larger performance gaps that would mean a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 80 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 80 per cent would result in 12.6 per cent of providers with point estimates below the numerical threshold. Thus, 11.0 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also had regard to the effect that a numerical threshold set at 80 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for 'Age on entry – 31 years and over' would be below the numerical threshold for 19 providers (20.7 per cent).
  - The point estimate for 'Disability reported' would be below the numerical threshold for five providers (38.5 per cent).

We note that the population for these groups are relatively small compared with the overall population for this indicator. We have already considered these characteristics in our use of sector performance data and Exploring Student Outcomes analysis, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for postgraduate part-time provision may not be sufficient for this mode and level of study. However, we have set out our mechanisms for considering the context for any provider

when making a decision about compliance. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we have also considered the consistency of this proposed numerical threshold with other proposed thresholds for this mode and level of study. We note that we have proposed a numerical threshold level of 75 per cent for both the continuation and completion (compound) indicators. We consider there is a risk of inconsistency in proposing a numerical threshold of 80 per cent for this indicator as we do not think that takes sufficient account of the likelihood of students leaving their studies at a later stage.

On balance, we therefore consider that a numerical threshold of 75 per cent would be most appropriate in this instance.

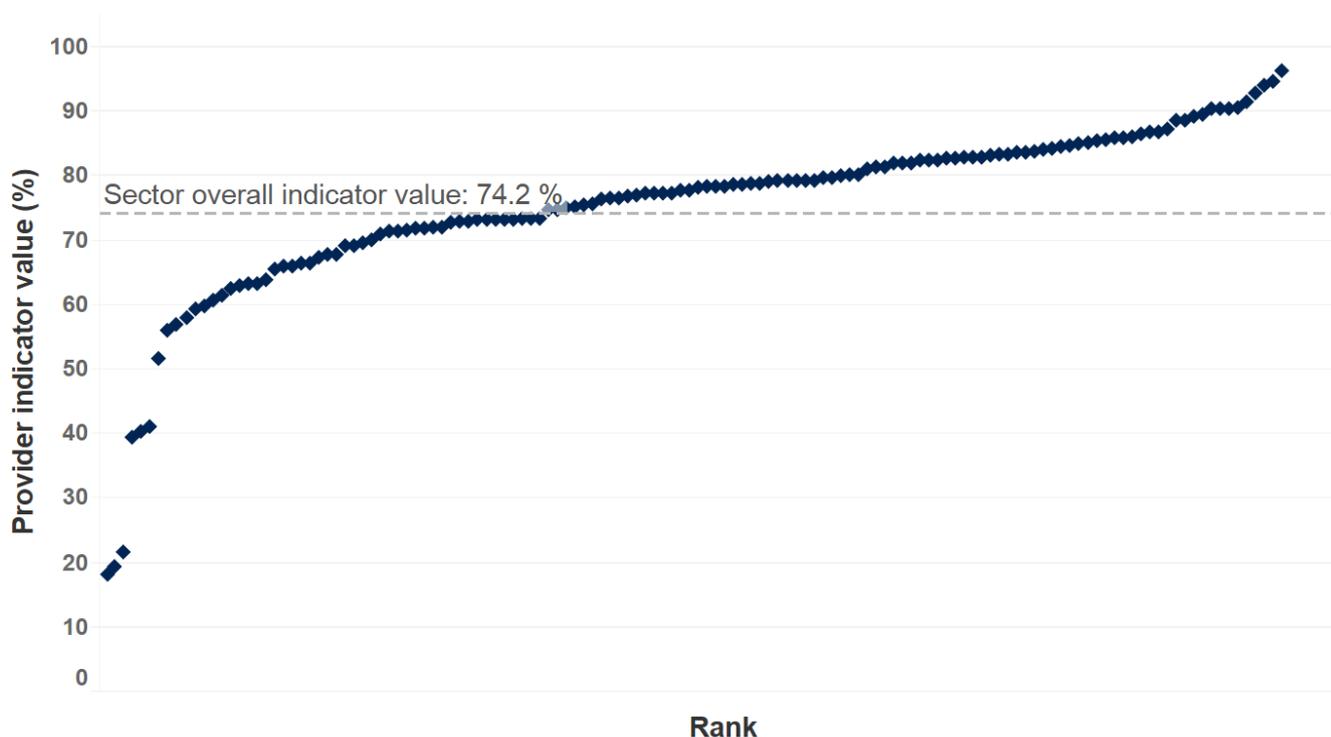
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	5 (4.2%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	350 (2.2%)
<b>Recommended numerical threshold level</b>	75%

## 50. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Part-time

**Level of study:** Postgraduate taught masters

**Figure B50: Sector overall rate = 74.2%**



**Sector median (unweighted):** 78.0%

**Sector weighted median:** 77.2%

**Recommended starting point before adjustment:** 75%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Consistent with the starting point for other indicators at this level and mode of study.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have not identified sector-wide contextual factors that demonstrate larger performance gaps that would indicate that a larger adjustment would be recommended for this indicator.
- Analysis suggests a numerical threshold of 70 per cent may have been reasonable because:
- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 70 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 70 per cent would result in 22.4 per cent of providers with point estimates below the numerical threshold. Thus, 26.1 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 70 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Ethnicity – Asian’ would be below the numerical threshold for 28 providers (34.6 per cent).
- The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for 24 providers (34.3 per cent).
- The point estimate for ‘Disability type – sensory, medical or physical impairments’ would be below the numerical threshold for 16 providers (39.0 per cent).

We therefore considered an alternative numerical threshold of 65 per cent. We considered that a threshold at this level would be more appropriate.

- 14.2 per cent of providers have a point estimate below a numerical threshold of 65 per cent. 15.8 per cent of students would be studying at providers with point estimates below a numerical threshold set at 65 per cent. There is a risk that a numerical threshold of 65 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 65 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 35 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

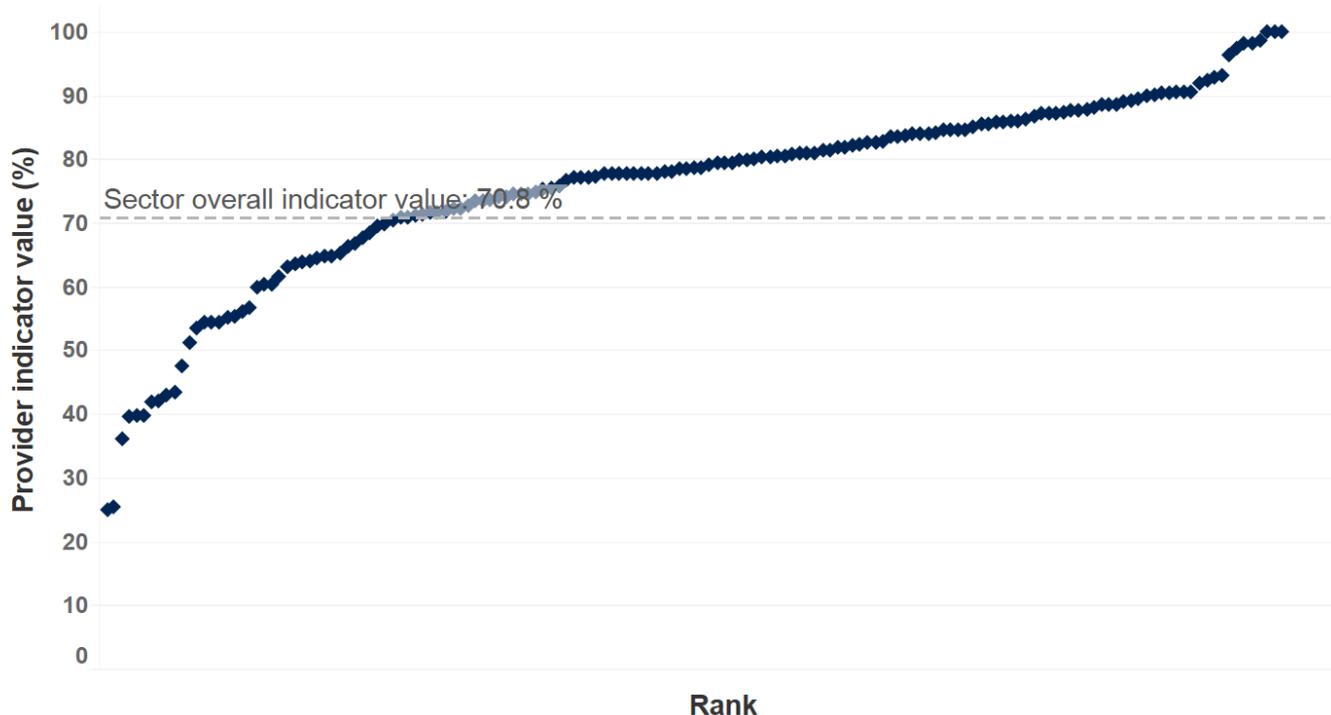
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	19 (14.2%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	23,110 (15.8%)
<b>Recommended numerical threshold level</b>	65%

## 51. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Part-time

**Level of study:** Other postgraduate

**Figure B51: Sector overall rate = 70.8%**



**Sector median (unweighted): 78.7%**

**Sector weighted median: 74.6%**

**Recommended starting point before adjustment: 70%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as set out in our policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have not identified sector-wide contextual factors with larger performance gaps that would mean a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 65 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 65 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 65 per cent would result in 19.7 per cent of providers with point estimates below the numerical threshold. Thus, 26.1 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 65 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for 17 providers (32.7 per cent).
- The point estimate for ‘Disability type – other or multiple impairments’ would be below the numerical threshold for seven providers (43.8 per cent).

We therefore considered an alternative numerical threshold of 60 per cent. We considered that a threshold at this level would be more appropriate.

- 13.4 per cent of providers have a point estimate below a numerical threshold of 60 per cent. 21.6 per cent of students would be studying at providers with point estimates below a numerical threshold set at 60 per cent. There is a risk that a numerical threshold of 60 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 60 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 40 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.
- We recognise that the proposed numerical threshold for this measure of completion (cohort tracking indicator) is not consistent with the proposed level for the composite measure of completion. The different methods for constructing these measures have resulted in different outcomes for sector performance, leading us to recommend different numerical threshold levels. We think this is reasonable to set out the effects on thresholds of both indicators for the purpose of consultation.

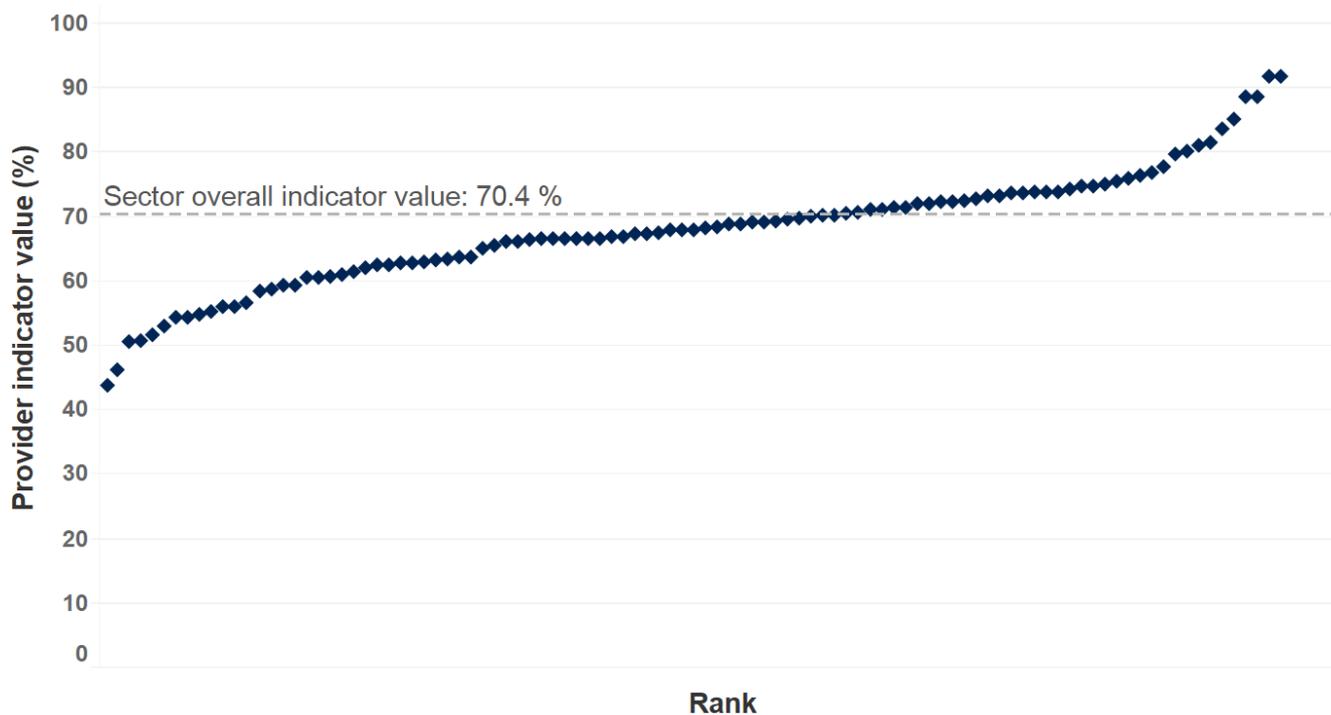
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	21 (13.4%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	29,900 (21.6%)
<b>Recommended numerical threshold level</b>	60%

## 52. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Part-time

**Level of study:** Postgraduate research

**Figure B52: Sector overall rate = 70.4%**



**Sector median (unweighted):** 68.1%

**Sector weighted median:** 70.2%

**Recommended starting point before adjustment:** 70%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have identified that most sector-wide contextual factors do not indicate larger performance gaps that would mean a larger adjustment would be recommended for this indicator.
- However, there is some evidence of a larger performance gap for disabled students. The weighted median for students reporting a disability was 64.6 per cent, slightly more than the proposed downward adjustment. Disabled students account for 3 per cent of students for this indicator. We note that the sub-categories for the type of disability reported contain very small populations for this indicator, and we therefore do not consider that there is sufficient statistical confidence to make further judgements at a sector level using this data.

Analysis suggests a numerical threshold of 60 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 60 per cent would result in 16.8 per cent of providers with point estimates below the numerical threshold. Thus, 11.0 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also had regard to the effect that a numerical threshold set at 60 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified one example where a disproportionately large number of providers would have split indicators where this was the case. The point estimate for 'Disability reported' would be below the numerical threshold for six providers (30 per cent). We note that the population for this group is relatively small compared with the overall population for this indicator. We have already considered student characteristics in our use of sector performance data and Exploring Student Outcomes analysis, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for part-time postgraduate provision may not be sufficient for this mode and level of study. However, we have set out our mechanisms for considering the context for any provider when making a decision about compliance. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	17 (16.8%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	2,390 (11.0%)
<b>Recommended numerical threshold level</b>	60%

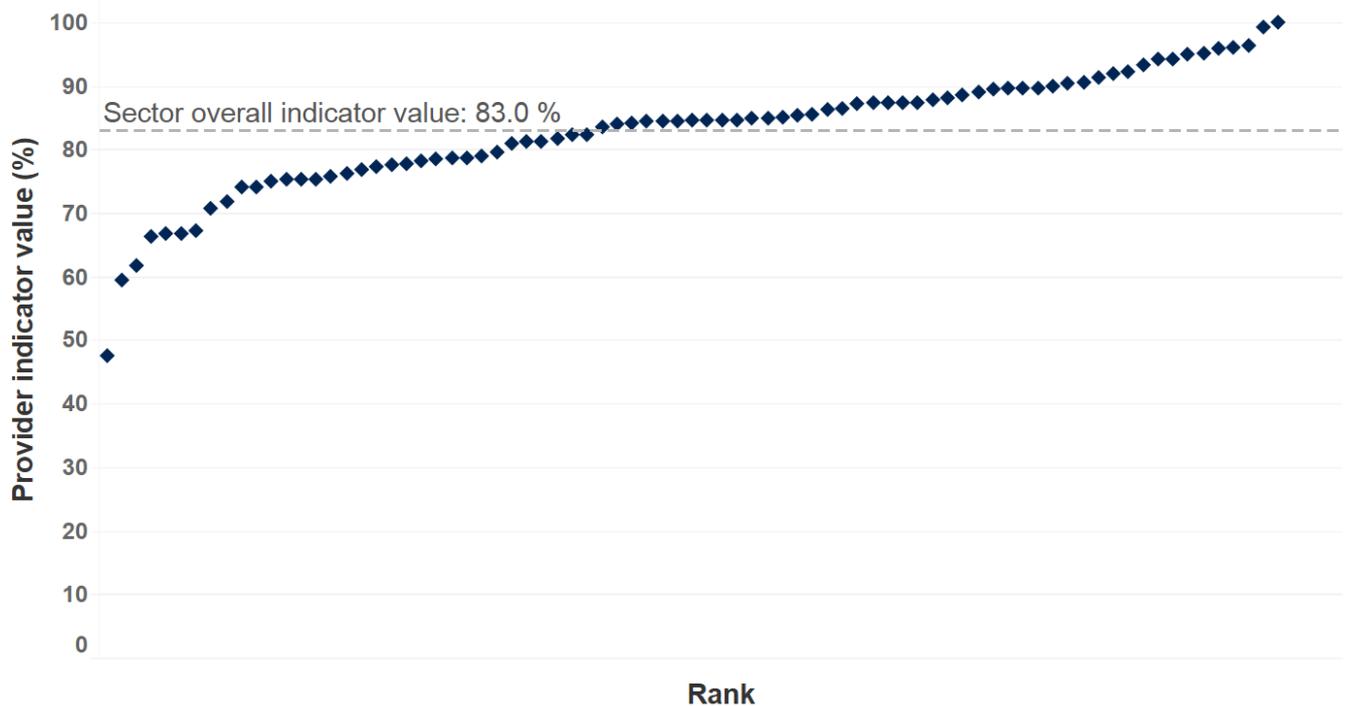
# Numerical thresholds for completion – compound indicator: Part-time postgraduate

## 53. Numerical threshold for: Completion – compound indicator

**Mode of study:** Part-time

**Level of study:** PGCE

**Figure B53: Sector overall rate = 83.0%**



**Sector median (unweighted):** 84.7%

**Sector weighted median:** 84.9%

**Recommended starting point before adjustment:** 80%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have not identified sector-wide contextual factors with larger performance gaps that would mean a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 75 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 75 per cent would result in 13.9 per cent of providers with point estimates below the numerical threshold. Thus, 7.4 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also had regard to the effect that a numerical threshold set at 75 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis has not identified examples where a disproportionately large number of providers would have split indicators where this was the case.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

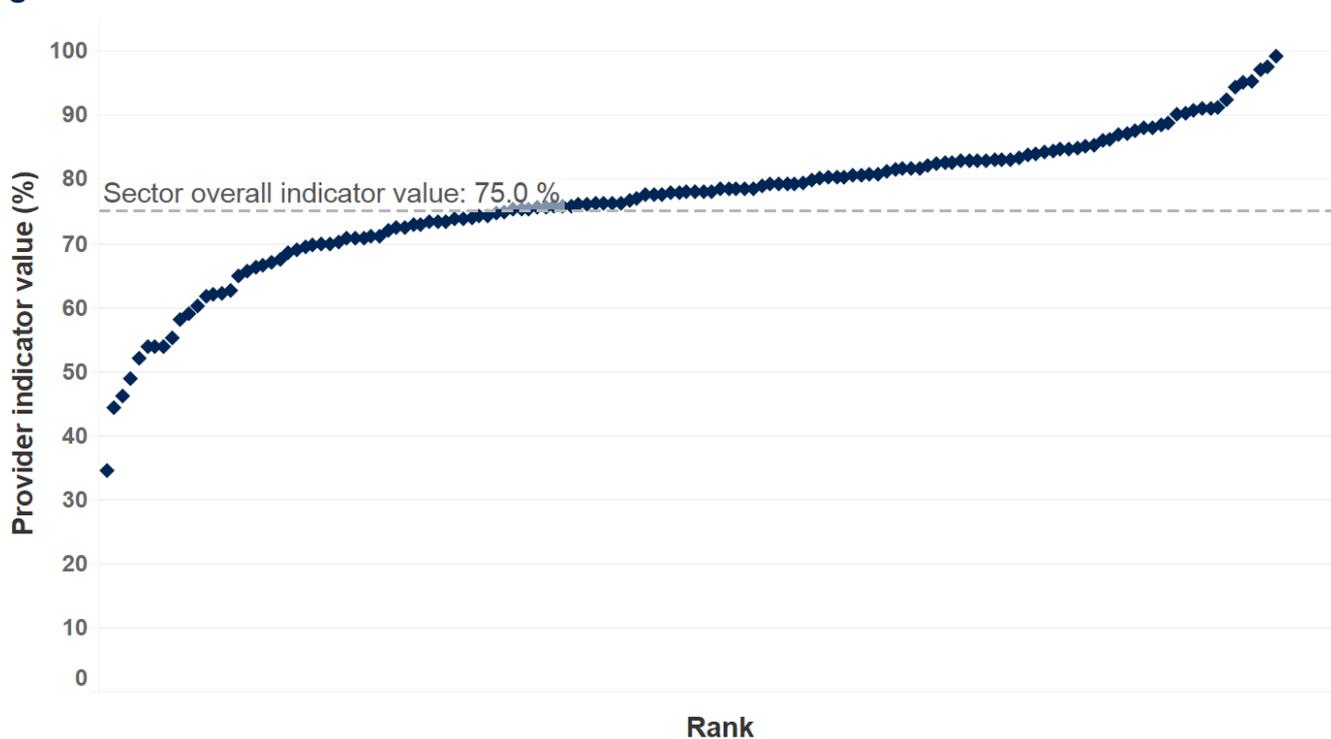
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	11 (13.9%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	510 (7.4%)
<b>Recommended numerical threshold level</b>	75%

## 54. Numerical threshold for: Completion – compound indicator

**Mode of study:** Part-time

**Level of study:** Postgraduate taught masters

**Figure B54: Sector overall rate = 75.0%**



**Sector median (unweighted):** 78.1%

**Sector weighted median:** 77.8%

**Recommended starting point before adjustment:** 75%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Consistent with the starting point for other indicators at this level and mode of study.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have identified that most sector-wide contextual factors do not indicate larger performance gaps that would mean a larger adjustment would be recommended for this indicator.
- However, there is some evidence of a larger performance difference for Black students. The weighted median for these students is 67.5 per cent, below the range of the proposed downward adjustment of 5 percentage points. Our Exploring Student Outcomes analysis (see Annex A) suggests that the performance difference is estimated at 8.7 percentage points for Black British – Other students compared with white students, and 7.5 percentage points for Black or Black British - Caribbean students for all part-time postgraduate study when controlled for all factors except provider. Black students account for 6.7 per cent of students for this indicator, which is likely to limit the impact of this difference on an individual provider's performance.

Analysis suggests a numerical threshold of 70 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 70 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 70 per cent would result in 19 per cent of providers with point estimates below the numerical threshold. Thus, 19.9 per cent of students

would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.

- We have also had regard to the effect that a numerical threshold set at 70 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for ‘Ethnicity – other’ (to include ethnicities other than white) would be below the numerical threshold for 37 providers (33.9 per cent).
  - The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for 45 providers (57 per cent).
  - The point estimate for ‘Disability type – mental health condition’ would be below the numerical threshold for 21 providers (50 per cent).
  - The point estimate for ‘Disability type – other or multiple impairments’ would be below the numerical threshold for 20 providers (48.8 per cent).

We therefore considered an alternative numerical threshold of 65 per cent. We considered that a threshold at this level would be more appropriate.

- 12.0 per cent of providers have a point estimate below a numerical threshold of 65 per cent. 13.3 per cent of students would be studying at providers with point estimates below a numerical threshold set at 65 per cent. There is a risk that a numerical threshold of 65 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 65 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 35 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

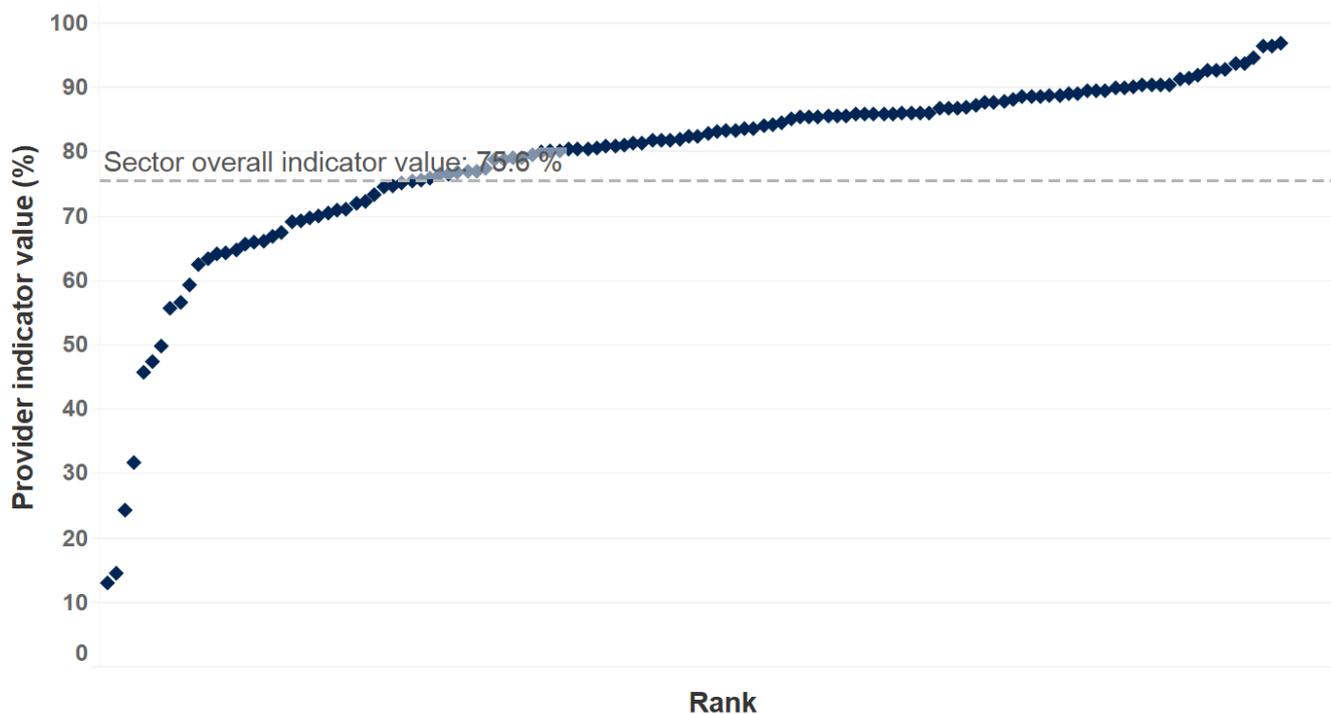
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	17 (12.0%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	20,850 (13.3%)
<b>Recommended numerical threshold level</b>	65%

## 55. Numerical threshold for: Completion – compound indicator

**Mode of study:** Part-time

**Level of study:** Other postgraduate

**Figure B55: Sector overall rate = 75.6%**



**Sector median (unweighted):** 82.4%

**Sector weighted median:** 80.6 %

**Recommended starting point before adjustment:** 75%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as set out in our policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have not identified sector-wide contextual factors with larger performance gaps that would mean a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 70 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 70 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 70 per cent would result in 18 per cent of providers with point estimates below the numerical threshold. Thus, 21.5 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 70 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for ‘Ethnicity – Black’ would be below the numerical threshold for 26 providers (42.6 per cent).
- The point estimate for ‘Ethnicity – Unknown’ would be below the numerical threshold for 17 providers (34.7 per cent).
- The point estimate for ‘Disability type – other or multiple impairments’ would be below the numerical threshold for nine providers (42.9 per cent).
- The point estimate for ‘Disability type – sensory, medical or physical impairments’ would be below the numerical threshold for 10 providers (37.0 per cent).

We therefore considered an alternative numerical threshold of 65 per cent. We considered that a threshold at this level would be more appropriate.

- 11.7 per cent of providers have a point estimate below a numerical threshold of 65 per cent. 12.3 per cent of students would be studying at providers with point estimates below a numerical threshold set at 65 per cent. There is a risk that a numerical threshold of 65 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 65 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS’s view is that 35 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.
- We recognise that the proposed numerical threshold for this measure of completion (composite indicator) is not consistent with the proposed level for the cohort tracking measure of completion. The different methods for constructing these measures have resulted in different outcomes for sector performance, leading us to recommend different numerical threshold levels. We think this is reasonable to set out the effects on thresholds of both indicators for the purpose of consultation.

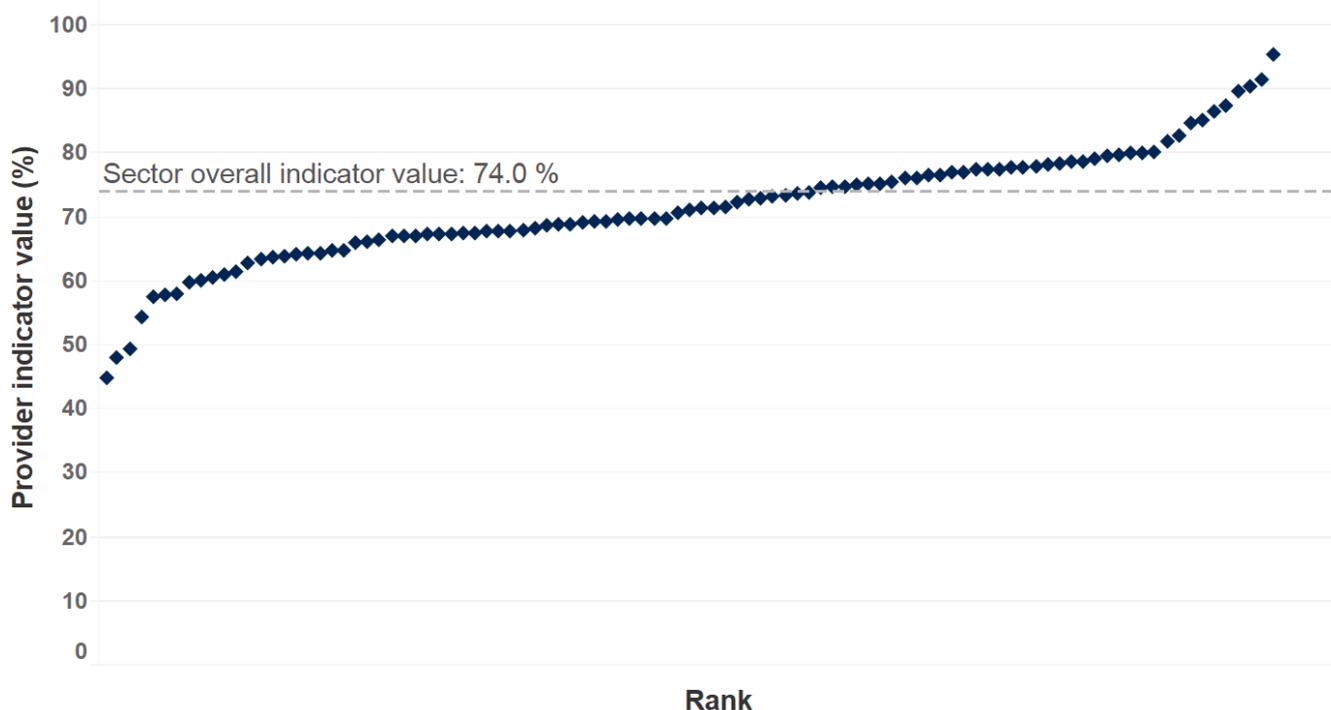
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	15 (11.7%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	14,890 (12.3%)
<b>Recommended numerical threshold level</b>	65%

## 56. Numerical threshold for: Completion – compound indicator

**Mode of study:** Part-time

**Level of study:** Postgraduate research

**Figure B56: Sector overall rate = 74.0%**



**Sector median (unweighted):** 71.2%

**Sector weighted median:** 74.6%

**Recommended starting point before adjustment:** 70%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have not identified sector-wide contextual factors with larger performance gaps that would mean a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 65 per cent may have been reasonable because:

- It would reflect the average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 65 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 65 per cent would result in 21.2 per cent of providers with point estimates below the numerical threshold. Thus, 17.1 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- We have also had regard to the effect that a numerical threshold set at 65 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:

- The point estimate for 'Ethnicity – other' (to include ethnicities other than white) would be below the numerical threshold for 12 providers (31.6 per cent).
- The point estimate for 'POLAR quintiles – Q1 or Q2' would be below the numerical threshold for 15 providers (30.6 per cent).

We therefore considered an alternative numerical threshold of 60 per cent. We considered that a threshold at this level would be more appropriate.

- 9.1 per cent of providers have a point estimate below a numerical threshold of 60 per cent. 7.2 per cent of students would be studying at providers with point estimates below a numerical threshold set at 60 per cent. There is a risk that a numerical threshold of 60 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 60 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS's view is that 40 per cent of students not completing their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not completing their courses and that a threshold below this level may not afford an appropriate level of protection to students.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	9 (9.1%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	1,440 (7.2%)
<b>Recommended threshold level</b>	60%

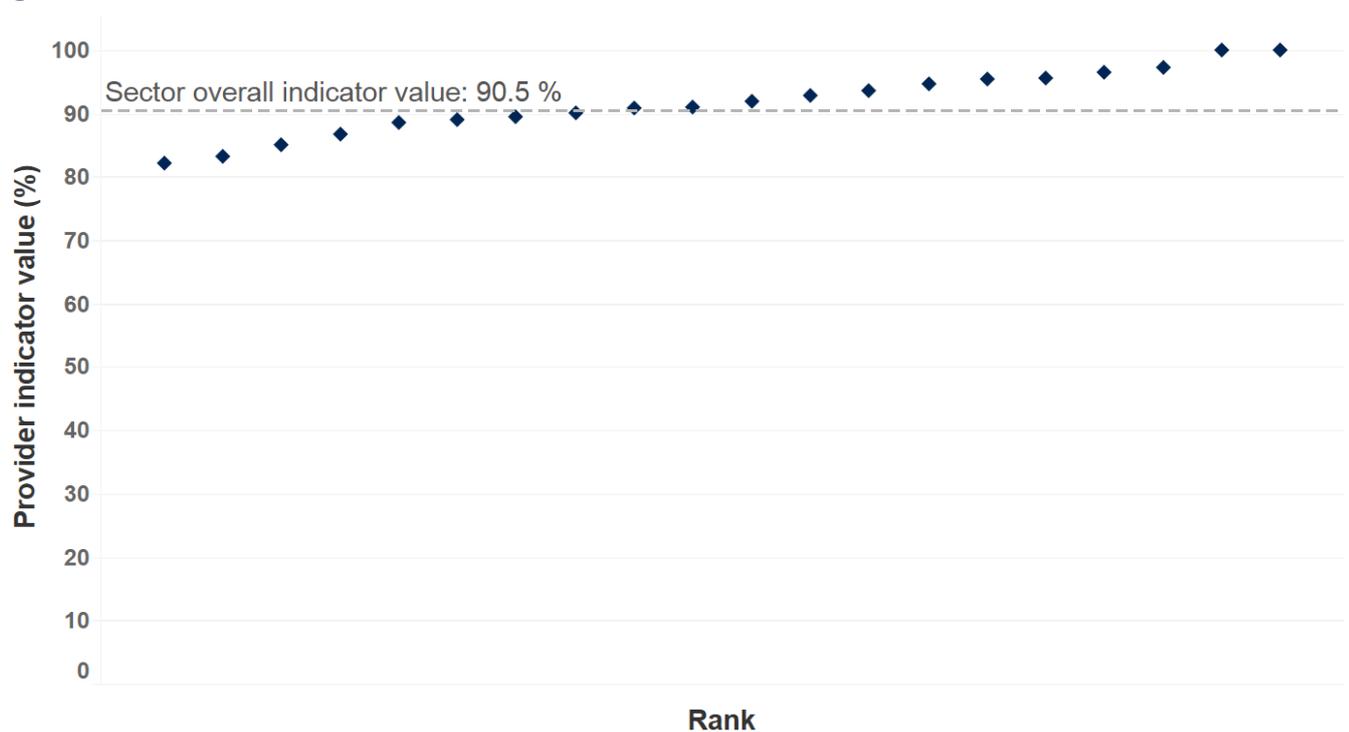
# Numerical thresholds for progression: Part-time postgraduate

## 57. Numerical threshold for: Progression

**Mode of study:** Part-time

**Level of study:** PGCE

**Figure B57: Sector overall rate = 90.5%**



**Sector median (unweighted):** 91.6%

**Sector weighted median:** 92.0%

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have not identified sector-wide contextual factors that demonstrate larger performance gaps that would indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in 10 per cent of providers with point estimates below the numerical threshold. Thus, 6.5 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- We have also considered the limited availability of data for this mode and level of study. There are fewer than 25 providers with point estimates for graduate outcomes data, which impacts the level of further analysis. We have therefore, in this instance, given weight to our policy intention of setting thresholds consistently, and have proposed a numerical threshold in line with the proposed numerical threshold for progression for full-time PGCE students.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- We have noted that the use of survey data for this indicator results in a greater degree of statistical uncertainty around the data for individual providers, especially for smaller providers. We have considered mechanisms for taking account of greater statistical uncertainty in the data in Proposal 6 of the consultation, and do not propose to make additional adjustments to the numerical threshold to take further account of this at a sector level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.

- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

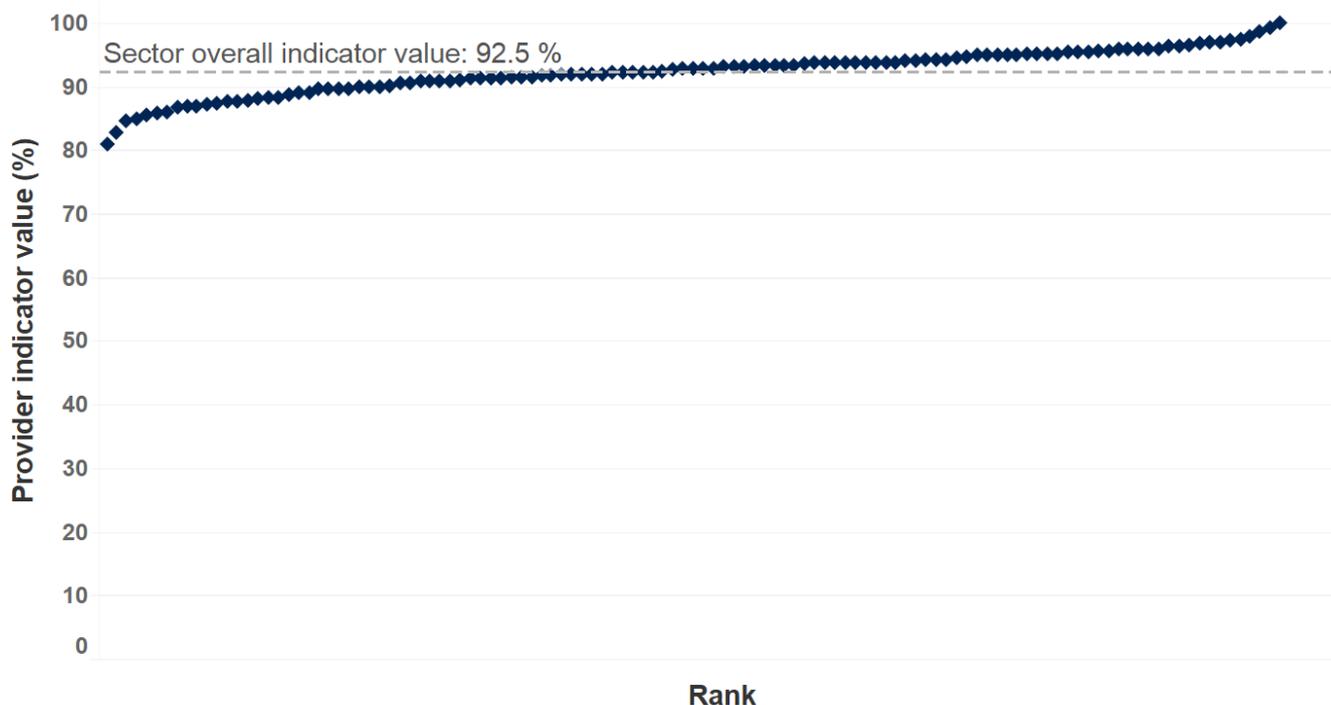
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	2 (10.0%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	50 (6.5%)
<b>Recommended numerical threshold level</b>	85%

## 58. Numerical threshold for: Progression

**Mode of study:** Part-time

**Level of study:** Postgraduate taught masters

**Figure B58: Sector overall rate = 92.5%**



**Sector median (unweighted):** 93.0%

**Sector weighted median:** 92.3%

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

### Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have not identified sector-wide contextual factors that demonstrate larger performance gaps that would indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in 3.4 per cent of providers with point estimates below the numerical threshold. Thus, 1 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have some split indicators where this was the case. For example:
  - The point estimate for 'Age on entry – under 25 years' would be below the numerical threshold for 13 providers (20.6 per cent).
  - The point estimate for 'Disability reported' would be below the numerical threshold for 20 providers (38.5 per cent).
  - The point estimate for 'Ethnicity – other' (to include ethnicities other than white) would be below the numerical threshold for 16 providers (24.2 per cent).

We note that the population for these groups are relatively small compared with the overall population for this indicator. We have already considered these characteristics in our use of sector performance data and Exploring Student Outcomes analysis, and we consider that this does not represent a sufficiently large proportion to suggest that the proposed downward adjustment for part-time postgraduate provision may not be sufficient for this level and mode of study. However, we have set out our mechanisms for considering the context for any provider when making a decision about compliance. In making this judgement we have placed weight on our policy objectives in relation to equality of opportunity.

- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.

- We have noted that the use of survey data for this indicator results in a greater degree of statistical uncertainty around the data for individual providers, especially for smaller providers. We have considered mechanisms for taking account of greater statistical uncertainty in the data in Proposal 6 of the consultation, and do not propose to make additional adjustments to the numerical threshold to take further account of this at a sector level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

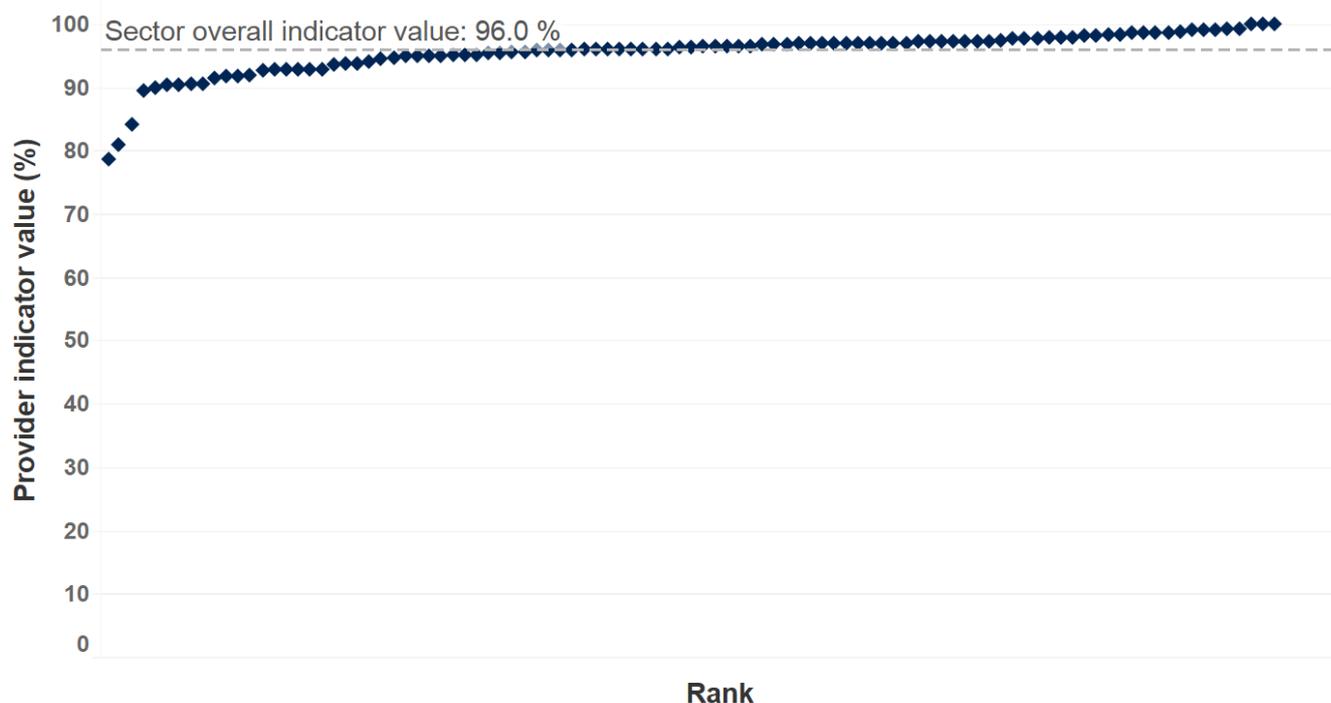
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	4 (3.4%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	270 (1.0%)
<b>Recommended numerical threshold level</b>	85%

## 59. Numerical threshold for: Progression

**Mode of study:** Part-time

**Level of study:** Other postgraduate

**Figure B59: Sector overall rate = 96.0%**



**Sector median (unweighted):** 96.4%

**Sector weighted median:** 96.6%

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have not identified sector-wide contextual factors that demonstrate larger performance gaps that would indicate that a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in 3.0 per cent of providers with point estimates below the numerical threshold. Thus, 1.1 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis has not identified examples where a disproportionately large number of providers would have split indicators where this was the case.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- We have noted that the use of survey data for this indicator results in a greater degree of statistical uncertainty around the data for individual providers, especially for smaller providers. We have considered mechanisms for taking account of greater statistical uncertainty in the data in Proposal 6 of the consultation, and do not propose to make additional adjustments to the numerical threshold to take further account of this at a sector level.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

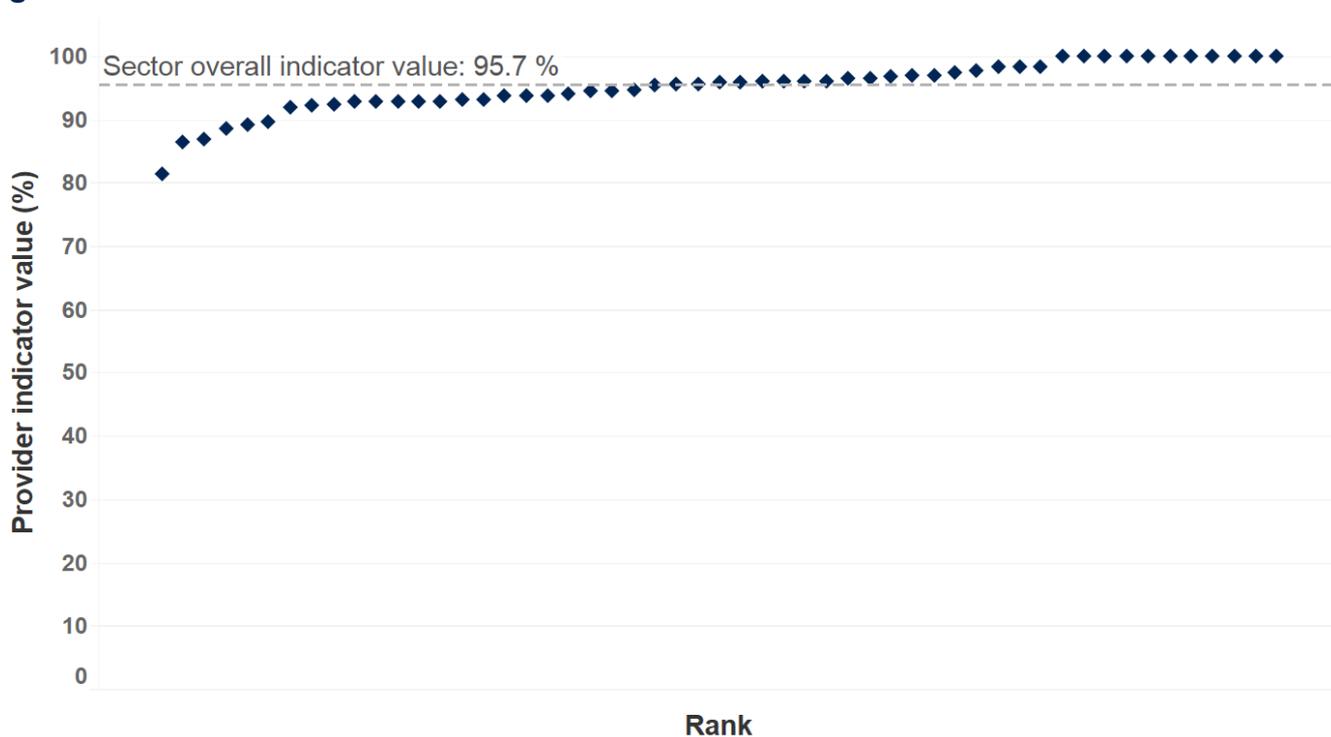
<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	3 (3.0%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	190 (1.1%)
<b>Recommended numerical threshold level</b>	85%

## 60. Numerical threshold for: Progression

**Mode of study:** Part-time

**Level of study:** Postgraduate research

**Figure B60: Sector overall rate = 95.7%**



**Sector median (unweighted):** 96.0%

**Sector weighted median:** 96.6%

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Considers the starting point used for other numerical thresholds at postgraduate level.
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for part-time postgraduate courses and have not identified sector-wide contextual factors with larger performance gaps that would mean a larger adjustment would be recommended for this indicator.

Analysis suggests a numerical threshold of 85 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- The effect of setting the numerical threshold at 85 per cent would result in one provider with a point estimate below the numerical threshold. Thus, 0.9 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement that this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis has not identified examples where providers would have split indicators where this was the case.
- We note that benchmarking data is not available for postgraduate levels of study and therefore has not formed part of this analysis.
- We have noted that the use of survey data for this indicator results in a greater degree of statistical uncertainty around the data for individual providers, especially for smaller providers. We have considered mechanisms for taking account of greater statistical uncertainty in the data in Proposal 6 of the consultation, and do not propose to make additional adjustments to the numerical threshold to take further account of this at a sector level.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted numerical threshold</b>	1 (1.9%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	30 (0.9%)
<b>Recommended numerical threshold level</b>	85%

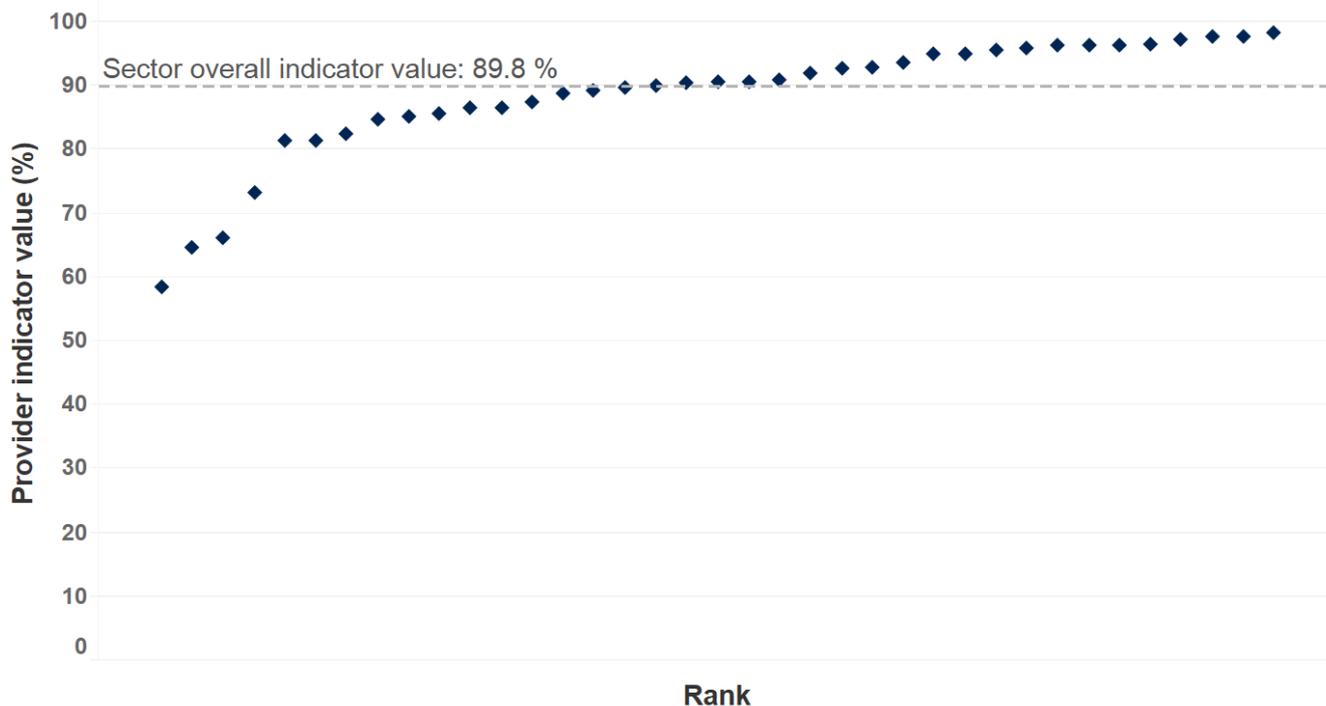
# Numerical thresholds for apprenticeship: Postgraduate

## 61. Numerical threshold for: Continuation

**Mode of study:** Apprenticeship

**Level of study:** Postgraduate

**Figure B61: Sector overall rate = 89.8%**



**Sector median (unweighted):** 90.6%

**Sector weighted median:** 90.7%

**Recommended starting point before adjustment:** 90%

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for postgraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.
- We have noted that the population for this indicator, in terms of both student numbers and providers offering this level and mode of study, is small (3,870 students). This impacts the statistical confidence we can have on judgements about the impact of sector-wide contextual factors when the data is further disaggregated.

Analysis suggests a numerical threshold of 85 per cent may have been reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for apprenticeship study and therefore has not formed part of this analysis.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

However, we consider that the following factors which suggest that setting the numerical threshold at 85 per cent would mean that we may need to place weight on our statutory duties to further reduce the numerical threshold:

- That the effect of setting the numerical threshold at 85 per cent would result in 21.6 per cent of providers with point estimates below the numerical threshold. These are smaller providers with fewer than 500 students. Thus, 17.3 per cent of students would study at providers with a point estimate below the numerical threshold. We consider that there is a balanced judgement about whether this would be proportionate having regard to our general duty to ensure that our regulatory focus is targeted only at cases where action is needed.

- We have also had regard to the effect that a numerical threshold set at 85 per cent would have on the proportion of providers where point estimates for split indicators would be below the numerical threshold. Our analysis identified that a disproportionately large number of providers would have split indicators where this was the case. For example:
  - The point estimate for 'IMD quintile – Q1 or Q2' would be below the numerical threshold for eight providers (47.1 per cent).
  - The point estimate for 'Sex – female' would be below the numerical threshold for eight providers (30.8 per cent)

We therefore considered an alternative numerical threshold of 80 per cent. We considered that a threshold at this level would be more appropriate.

- 10.8 per cent of providers have a point estimate below a numerical threshold of 80 per cent. 6.3 per cent of students would be studying at providers with point estimates below a numerical threshold set at 80 per cent. There is a risk that a numerical threshold of 80 per cent (or lower) may not capture provision where students may require protection from performance which is above a threshold of 80 per cent (or lower) but nonetheless weak, especially when our mechanisms for considering statistical uncertainty and contextual factors are taken into account.
- The OfS's view is that 20 per cent of students not continuing on their higher education course represents a significant proportion of students. We would have concerns about this proportion of students not continuing with their courses and that a threshold below this level may not afford an appropriate level of protection to students.

<b>Data issues</b>	None identified
<b>Recommended adjustment</b>	10 ppt below starting point
<b>Providers with point estimates below adjusted threshold</b>	4 (10.8%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	250 (6.3%)
<b>Recommended threshold level</b>	80%

## 62. Numerical threshold for: Completion – cohort tracking

**Mode of study:** Apprenticeship

**Level of study:** Postgraduate

- This is a relatively new mode and level of study, and thus we do not have data that enables us to consider sector performance in the same way that we have for other indicators.
- We think it is reasonable to set a numerical threshold for this indicator at this point in time, as we expect data to become available that will enable us to consider performance before the next planned review of numerical threshold levels.

We consider that a numerical threshold of 80 per cent may be reasonable because:

- It is consistent with the proposed numerical threshold level for the continuation indicator for this mode and level of study. It is also consistent with the compound indicator for completion numerical threshold that we have proposed. Our analysis of other postgraduate modes of study suggests that it is reasonable to propose levels for numerical thresholds with this consistency.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

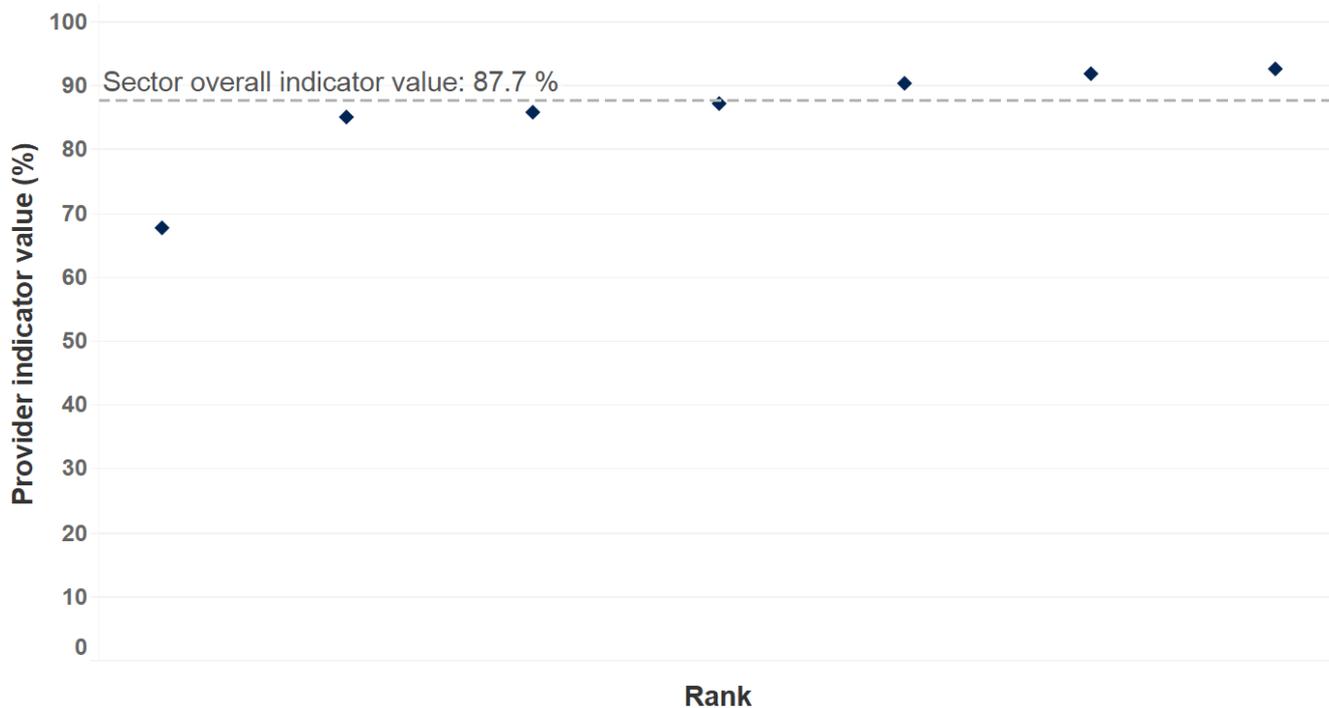
<b>Data issues</b>	No data available
<b>Recommended adjustment</b>	N/A
<b>Providers with point estimates below adjusted threshold</b>	N/A
<b>Students studying at providers with point estimates below recommended threshold level</b>	N/A
<b>Recommended threshold level</b>	80%

## 63. Numerical threshold for: Completion – compound indicator

**Mode of study:** Apprenticeship

**Level of study:** Postgraduate

**Figure B63: Sector overall rate = 87.7%**



**Sector median (unweighted): 87.3%**

**Sector weighted median: 90.5%**

**Recommended starting point before adjustment: 85%**

### Reason for recommended starting point

- Reflective of sector performance considering the sector overall rate, weighted and unweighted sector median performance for this indicator, as indicated by our stated policy intention.
- Makes sufficient allowance for factors outside the provider's control (e.g. changes in students' personal circumstances).
- Regulatory judgement made that this represents the point at which the OfS can be confident there is no need to intervene to protect students, as set out in Proposal 3 of the consultation document.

## Analysis

From our analysis of data for this indicator, we have noted the following considerations when recommending the appropriate level of further adjustment to take account of sector-wide contextual factors:

- We have taken account of the proposed downward adjustment of 5 percentage points for postgraduate courses and have not identified any sector-wide contextual factors with larger performance gaps that indicate that a larger adjustment would be recommended for this indicator.
- We have noted that the population for this indicator, in terms of both student numbers and providers offering this level and mode of study, is small (1,670 students at seven providers). This impacts the statistical confidence we can have on judgements about the impact of sector-wide contextual factors when the data is further disaggregated.

Analysis suggests a numerical threshold of 80 per cent may be reasonable because:

- It would reflect the high average performance in the sector and be in line with our general policy that we would be unlikely to identify performance that is at or close to the sector average as requiring improvement.
- Consideration of sector performance through Exploring Student Outcomes does not suggest estimated differences between particular student characteristics that would require a larger adjustment than the proposed downward adjustment of 5 percentage points.
- We note that benchmarking data is not available for apprenticeship study and therefore has not formed part of this analysis.
- We have also considered the limited availability of data for this mode and level of study. There are fewer than 25 providers with point estimates for this indicator. We have therefore, in this instance, given weight to our policy intention of setting thresholds consistently, and have proposed a numerical threshold in line with the proposed numerical threshold for continuation and for completion (cohort tracking) for postgraduate apprenticeship students.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In having regard to the Public Sector Equality Duty, we consider that the analysis we have undertaken, as set out in Annex A of this document, shows that a threshold at this level would, in general, not disproportionately affect underrepresented groups of students.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

<b>Data issues</b>	Limited data set
<b>Recommended adjustment</b>	5 ppt below starting point
<b>Providers with point estimates below adjusted threshold</b>	1 (14.3%)
<b>Students studying at providers with point estimates below recommended threshold level</b>	110 (6.4%)
<b>Recommended threshold value</b>	80%

## 64. Numerical threshold for: Progression

**Mode of study:** Apprenticeship

**Level of study:** Postgraduate

- This is a relatively new mode and level of study, and thus we do not have data that enables us to consider sector performance in the same way that we have for other indicators.
- We think it is reasonable to set a numerical threshold for this indicator at this point in time, as we expect data to become available that will enable us to consider performance before the next planned review of numerical threshold levels.

We consider that a numerical threshold of 80 per cent may be reasonable because:

- It is consistent with the proposed numerical threshold level for continuation and completion indicators for this mode and level of study. Our analysis of other postgraduate modes of study suggests that it is reasonable to propose levels for numerical thresholds with this consistency, and we have given weight to this factor in making this proposal.
- We have also noted the relationship with existing employment for students at this mode and level of study, which we think further suggests that a threshold at this level would be proportionate.
- Our regulatory judgement is that it would be reasonable to expect providers to be able to meet a numerical threshold set at this level.
- In setting the numerical threshold at this level, we have had due regard to guidance from the Secretary of State, and consideration of the taxpayer interest as set out in our policy intentions.

<b>Data issues</b>	No data available
<b>Recommended adjustment</b>	N/A
<b>Providers with point estimates below adjusted threshold</b>	N/A
<b>Students studying at providers with point estimates below recommended threshold level</b>	N/A
<b>Recommended threshold level</b>	80%