

Business plan 2025-26



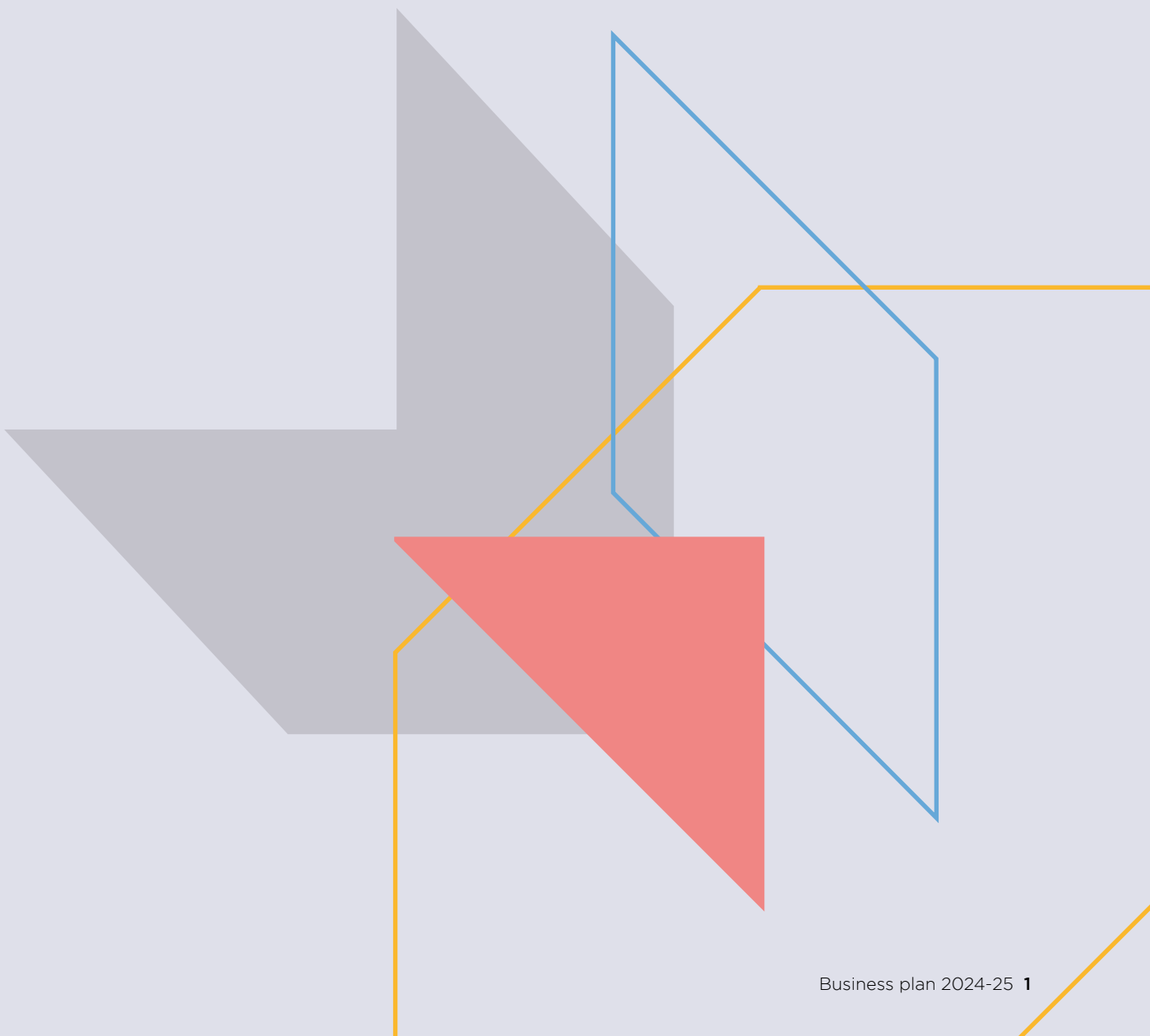
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Foreword



I am pleased to share the priorities of the Office for Students for 2025-26.

Universities and colleges continue to face significant challenges and changing expectations from students and wider society. Our recent report on financial sustainability highlighted the

significant pressures facing many higher education institutions.¹ In addressing these pressures, universities and colleges will need to maintain the quality of their courses, as well as seeking to innovate

and improve. As higher education evolves, students need to be treated fairly and to have a positive experience at university. The Office for Students' (OfS's) responsibility is to be a constructive, active and strategic influence in this changing landscape, focused on the interests of students.

Our business plan for this year continues to implement the recommendations in 'Fit for the future: Higher education regulation towards 2035', the 2024 independent public bodies review of the OfS.² These recommendations informed our proposed strategy, on which we consulted in spring 2025.

¹ OfS, '[Financial sustainability of higher education providers in England: 2025](#)'.

² GOV.UK, '[Fit for the Future: Independent review of the Office for Students](#)'.

Our activity for the year reflects the challenges and opportunities ahead, focusing on three priorities: quality, the wider student experience, and the resilience of the higher education sector.

In 2025-26:

- We will develop and consult on a refreshed approach to quality, with a focus on supporting continuous improvement even in tough financial conditions.
- Having published guidance on free speech in June 2025, we will prepare to launch the new complaints scheme, subject to the decisions of Parliament.
- We will strengthen our work on student consumer protection, to ensure that students are treated fairly and have clear routes for redress where they encounter problems. This will include consulting on a new ongoing condition of registration to ensure providers are treating their students fairly.
- We will review our approach to collaborative outreach and to access and participation plans, to ensure that prospective students have appropriate support and resources in accessing higher education that is right for them.
- We will maintain a strong focus on financial sustainability and prepare for the potential for institutional closure. We will produce sector-wide analysis as well as monitoring individual institutions. We will engage with institutions where this is needed to ensure that students' interests are protected during times of financial challenges.
- We will continue our work with the Department for Education (DfE) and the Student Loans Company to protect public funding and improve institutions' governance. This will include introducing new initial conditions of registration for universities and colleges hoping to join the OfS Register. It also

means consulting on new ongoing conditions of registration, to ensure all universities and colleges maintain good governance and have robust control of any partnership arrangements they have with other higher education providers.

- We will reopen applications for registration, degree awarding powers and university title from August. This will include assessing applications from providers delivering subcontracted courses and those looking to take advantages of the opportunities the Lifelong Learning Entitlement will bring.

To inform all of this, we will continue to strengthen our understanding of what matters to students, and will engage routinely and collaboratively with universities and colleges to build trusted and productive relationships.

We will also keep working to reduce the burden regulation places on institutions, as long as this is consistent with achieving good regulatory outcomes on the issues that matter for students. And we will redouble our focus on the efficiency and effectiveness of the OfS itself, ensuring that we deliver efficiencies through increasingly effective regulation.

Overall, the plan focuses on regulating in a way that supports continually improving quality for students and an excellent student experience, in resilient and well governed universities and colleges.

I look forward to working with students, institutions and other partners to achieve it.

Susan Lapworth

Office for Students Chief Executive



How the business plan works

This business plan sets out the work we intend to do in 2025-26. It includes the operational activities that support our work and our plans for continuous improvement.

As the higher education environment evolves, we will need to respond flexibly when changes are required – for example, if we see risks in a certain area increasing. We will revisit the work in the plan if needed, to ensure effective regulation in the interests of students.

For simplicity, when referring in this document to the information we will publish, we are speaking about our expectations. However, we will take final decisions about whether or not to publish particular information after carefully considering all relevant matters.

The online version of the plan is available at www.officeforstudents.org.uk/about/how-we-are-run/our-business-plan/.

To provide feedback on the plan, contact info@officeforstudents.org.uk.



Why this is important

High quality is the foundation of student success and of public trust in the higher education sector. It enables students to gain the knowledge, skills and confidence they need to thrive in their lives and careers, and contribute to the wider economy and society.

However, universities and colleges face financial pressures, rapid development of new technologies and changing student needs, all of which mean that quality cannot be taken for granted. As the landscape shifts, new modes of delivery and engagement are emerging. In particular, the introduction of the Lifelong Learning Entitlement (LLE) and the expansion of technical skills pathways will reshape how some students engage with higher education.

It is also essential that standards are maintained, ensuring that qualifications remain meaningful and retain their value over time.

The OfS public bodies review affirmed that quality must remain a core priority, and that we should place a greater emphasis on improving quality beyond minimum requirements, to encourage excellence and innovation for all universities and colleges and for all students.³ To achieve this, the review recommended that the OfS should develop a more integrated, improvement-focused approach. Our actions for the year ahead will move us towards a system that maintains quality and standards, supports continuous improvement and ensures effective learning for all students.

What we will do in 2025-26

Work area	Description
Improving quality	<ul style="list-style-type: none">• We will develop a new integrated approach to assessing quality, informed by engagement with students and higher education providers.• We will consult on this new approach, including considering how risks to quality are identified and monitored.• We will explore the development of indicators to support our understanding of provider-level risks to quality and standards.• We will continue to assess apprenticeship provision.• We will continue to engage with organisations working in transnational education.

³ GOV.UK, ['Fit for the Future: Independent review of the Office for Students'](#).

Work area	Description
Lifelong Learning Entitlement	<ul style="list-style-type: none"> • We will prepare for measuring the numbers of students studying modules from 2026-27, and for collecting new data about completion of modules in 2027-28. • We will analyse the LLE's implications for our regulatory approach. • We will support the DfE in ensuring that the process for providers to apply for its modular eligibility check is ready before the LLE launch.
Skills	<ul style="list-style-type: none"> • We will complete monitoring and evaluation of the artificial intelligence and data science programme, which supports innovation in digital skills development. • We will monitor and evaluate the degree apprenticeship programme, supporting growth in high quality technical education. • We will continue to develop our policy on pathways and progression, including through collaboration with Skills England.
Freedom of speech	<ul style="list-style-type: none"> • We will support and promote freedom of speech within higher education. • We will investigate where we have particular concerns in relation to freedom of speech. • We will prepare for the introduction of a new freedom of speech complaints scheme, subject to decisions by Parliament.
Funding	<ul style="list-style-type: none"> • We will allocate OfS strategic priorities grant funding to support teaching and infrastructure across the sector.
Supervision and enforcement	<ul style="list-style-type: none"> • We will complete all quality assessments currently in progress. • We will open new assessments where we identify potential concerns. • We will continue informal engagement with providers to address risks early where possible. • We will further develop our enforcement guidance and processes to ensure that our approach to regulatory interventions is clear and efficient.

The wider student interest



Why this is important

Higher education should be a rich, rewarding environment, one that extends beyond lectures, labs and assessments. For many students to thrive, they need to feel part of a community that supports their learning and their wellbeing, values their voice, and equips them for life beyond graduation. This is especially important for students from underrepresented or disadvantaged backgrounds, who may face additional barriers to access and success. For example, we know that students who experience economic precarity or who are significantly disadvantaged are less likely to complete their course and to progress into highly skilled employment or further study.⁴

Students are entitled to fair, transparent and consistent treatment throughout their higher education. They rely on the commitments made by their university or college, whether about course content, assessment, support or outcomes. When these commitments are not met, students can face significant disruption and potential financial loss. Recent events, such as marking and assessment boycotts by teaching staff, have highlighted the importance of effective consumer protection. For example, our student insight work on marking and assessment showed that, of survey respondents whose course was affected by the 2023 boycott, about a third were satisfied with how it was handled by their institution while around half were dissatisfied.⁵

Students continue to face other challenges that can undermine their experience, from unclear information before their studies and inconsistent support during them, to poor handling of complaints and misconduct.

Our ability to regulate in the interests of students depends on a clear understanding of students' priorities. We are transforming how we engage with students, embedding their perspectives in our work through regular polling, deeper insight and a new Student Interest Board.

What we will do in 2025-26

Work area	Description
Student consumer protection	<ul style="list-style-type: none">Depending on consultation outcomes, we will introduce a new initial and ongoing condition of registration to ensure students are treated fairly.We will continue our collaboration with National Trading Standards, including referring relevant cases.We will implement our regulatory approach to any marking and assessment boycott, following the publication of our expectations.

⁴ OfS, '[KPM 6: Success and progression](#)'.

⁵ OfS, '[Marking and assessment boycotts: Student insight report](#)'.

Work area	Description
Student consumer protection	<ul style="list-style-type: none"> • We will work with the sector on a model student contract to support transparency and consistency. • We will review student protection plan requirements for higher education providers, as part of consulting on the ongoing conditions of registration relating to consumer protection.
Equality of opportunity	<ul style="list-style-type: none"> • We will assess new or updated access and participation plans (APPs) from those providers that require them, and consider variation requests from those with existing plans. • We will continue to evaluate the impact of recent reforms to APPs. • We will maintain the Equality of Opportunity Risk Register. • We will support the launch and evaluation of the Higher Education Evaluation Library hosted by Transforming Access and Student Outcomes in Higher Education (TASO). • We will implement the 2025-26 funding settlement for Uni Connect. • We will call for evidence on the future approach to collaborative outreach and APPs, and consult on the future of collaborative access. • We will continue to operate the Disability in Higher Education Advisory Panel. • We will monitor projects funded through our Equality in Higher Education Innovation Fund.
Student insight and engagement	<ul style="list-style-type: none"> • We will continue to gather and share timely insights into students' experiences, through regular polling and targeted research projects that explore key issues affecting students and support our regulatory objectives. • We will continue to engage directly with students, including through our termly online sessions. • We will support our new Student Interest Board to strengthen student engagement in our work. • We will publish the results of the 2025 National Student Survey, alongside additional analysis and commentary. • We will publish findings from our pilot survey on students' experiences of sexual misconduct. • We will review the information available to students to ensure it remains clear, relevant and accessible. • We will ensure compliance with requirements for the collection and publication of tuition fee information.

Sector resilience



Why this is important

A financially resilient and well governed higher education sector is essential to delivering high quality education and maintaining meaningful student choice, as well as ensuring long-term value for students and the public.

Today, universities and colleges face significant pressures, including inflation, declining international student numbers and continuing decline in the value in real terms of the income from UK undergraduates. Of the institutions included in our analysis published in May 2025, 43 per cent are forecasting a deficit for 2024-25.⁶ Pressures are not evenly distributed, and while many universities and colleges remain financially robust, others face acute risks.

When an institution experiences financial difficulty, the consequences for students can be significant: disrupted courses, uncertainty about qualifications and a loss of trust in the system. Financial instability can also limit innovation, reduce access and support, and undermine the long-term sustainability of the higher education sector. Strong governance is essential in this context. Well governed institutions are better equipped to identify and manage financial and strategic risks, and to uphold academic quality and standards.

It is also important to ensure public funding directed to higher education is used appropriately. The National Audit Office found that in 2022-23, 53 per cent by value of the £4.1 million fraud detected by the Student Loans Company (SLC) was at providers subcontracted by universities and colleges to deliver some of their teaching, despite students at such providers making up just 6.5 per cent of the total of SLC-funded students. We will continue to work closely with the SLC and DfE to address risks in this area, as well as in relation to other higher-risk business models.

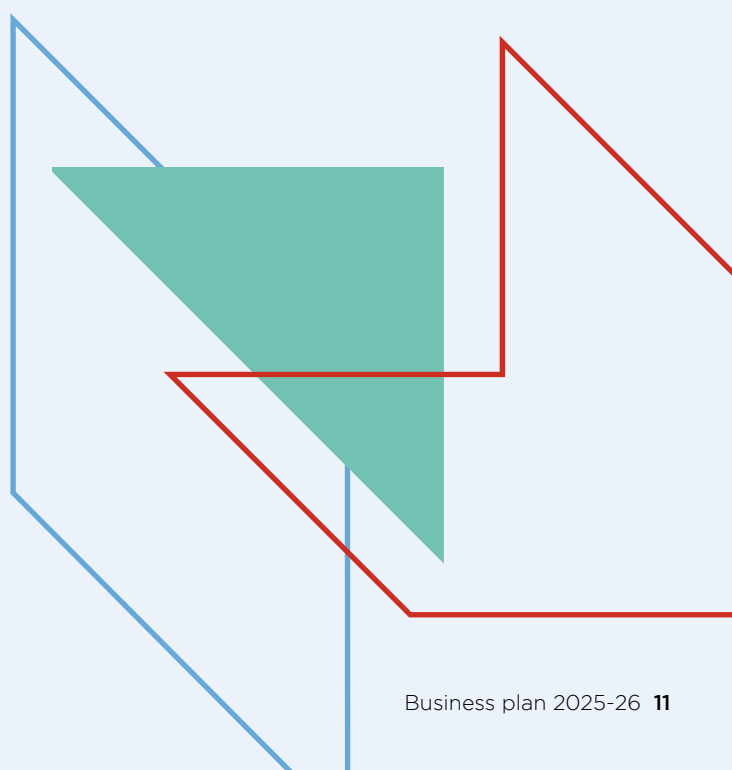
This year's plans will ensure that we can identify and respond to financial risks early, transparently and proportionately, so that risks are managed effectively and students' interests are protected. At the same time, we are strengthening our oversight of governance to ensure institutions are accountable, public funding is used appropriately and students can have confidence in the integrity of the higher education system. This is an area in which we can develop a collaborative approach with institutions and experts across the sector.

6 OfS, ['OfS analysis finds continued pressure on university finances'](#).

What we will do in 2025-26

Work area	Description
Financial assessment	<ul style="list-style-type: none"> • We will set out clear expectations for higher education providers on financial sustainability, and seek greater transparency in how they meet key viability and sustainability indicators. • We will continue to monitor the financial health of individual providers, using a risk-based approach to determine the appropriate level of engagement. • We will increase oversight where providers perform less well against key indicators. • We will continue in-year data collections and publish updates on sector resilience. • We will finalise an information-sharing framework with DfE, and refer providers for early intervention where appropriate.
Institutional closure	<ul style="list-style-type: none"> • We will oversee cases where there is a significant risk of institutional closure, using a risk-based approach. • We will, where necessary, put in place Student Protection Directions for individual providers at risk of institutional closure. • Through engagement with the sector and with government, we will produce an options analysis for implementing a validator of last resort, to protect students' interests in the event that the provider that validates their degrees closes. • We will engage with UCAS on the potential for a bespoke clearing system for students in the case of the closure of their provider.
Governance	<ul style="list-style-type: none"> • We will complete our consultation on proposed new initial conditions relating to treating students fairly and to effective governance. • We will consult on a new ongoing condition of registration for lead providers involved in subcontractual arrangements, including greater transparency in relation to income from such activity. • We will seek evidence to inform our wider approach to improving governance standards, for example developing potential new ongoing governance conditions, including through collaborative working with the Committee of University Chairs. • We will consult on proposals to reduce registration burden by removing governance conditions for further education colleges without degree awarding powers where oversight is already in place from another regulatory body.

Work area	Description
Governance	<ul style="list-style-type: none"> • We will undertake our functions relating to: <ul style="list-style-type: none"> – the regulation of exempt charities – Privy Council obligations – monitoring of relevant providers' compliance with the Prevent duty to stop people from becoming terrorists or supporting terrorism.
Protecting public funding	<ul style="list-style-type: none"> • We will monitor risks to public funding, working closely with DfE and the SLC to identify concerns, respond to intelligence and support investigations. • We will identify and communicate risk factors relating to the potential misuse of public funding. • We will increase our data audit activity to improve assurance across the sector. • We will undertake monitoring and assurance activity to ensure that OfS funding is used for the purposes intended.
Supervision and enforcement	<ul style="list-style-type: none"> • We will complete investigations currently in progress. • We will initiate additional investigations into governance and protecting public funding matters where we identify potential concerns. • We will continue informal engagement with providers to address risks early where possible. • We will further develop our enforcement guidance and processes, to ensure that our approach to regulatory interventions is clear and efficient.



Our operations



Why this is important

To achieve our strategic objectives, we must continue to adapt and innovate. Universities and colleges are navigating complex challenges and changes, and we will need to work with ambition and pace to ensure our regulatory approach remains effective.

The OfS public bodies review reinforced the importance of this operational transformation. In 2025-26, we will continue to become a more adaptable, collaborative, transparent, and effective regulator, focused on delivering value and effective regulation for students.

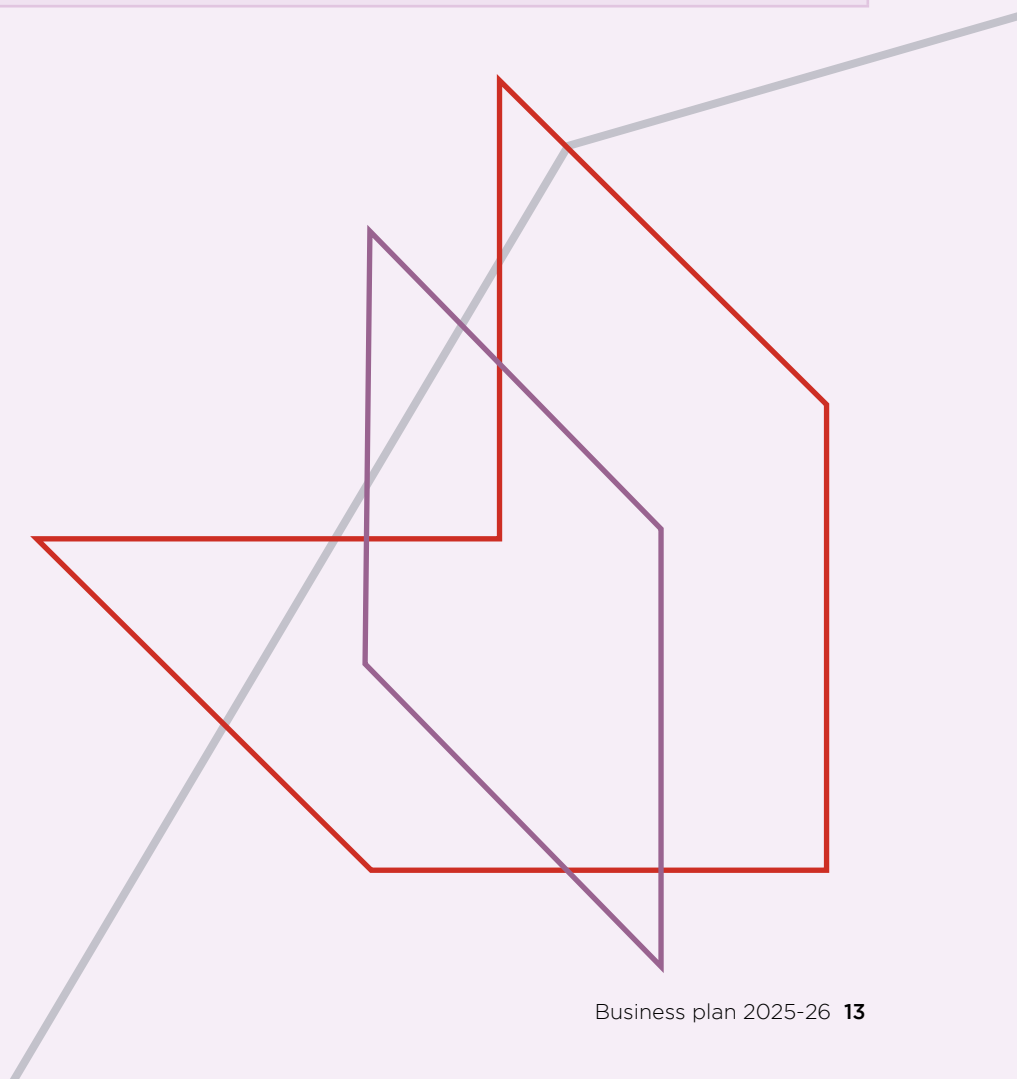
We have also considered how we can minimise and reduce regulatory burden wherever this is consistent with achieving effective regulatory outcomes for students. We see focused work on reducing data burden as a vital way to demonstrate impact in this area, as well as a range of actions relating to our registration, degree awarding powers and university title processes.

We will continue to improve how we engage with students and institutions, and how we collaborate across the wider education and regulatory landscape.

What we will do in 2025-26

Work area	Description
Registration, degree awarding powers and university title	<ul style="list-style-type: none">• We will reopen for registration, degree awarding powers (DAPs) and university title applications.• We will trial a new approach to variation assessments for DAPs, and a streamlined set of evidence requirements for other DAPs assessments.• We will conclude our consultation on new conditions of registration. This is expected to introduce new conditions in relation to consumer protection and effective governance, and increase the efficiency of the registration process.
Communications	<ul style="list-style-type: none">• We will continue our engagement programme with students and providers through events such as webinars, sector engagement sessions, and provider visits.• We will explore new ways for providers to give advice and challenge on the OfS's work.

Work area	Description
Communications	<ul style="list-style-type: none"> • We will improve transparency and understanding of our work by publishing Insight briefs on key regulatory issues and running our 2025 stakeholder survey to gather feedback from across the sector. • We will improve how we communicate with students and stakeholders by strengthening our presence in student media and making the OfS website more accessible and user friendly.
Data	<ul style="list-style-type: none"> • We will continue to work with the sector and Jisc on our transition to in-year collection of student data. • We will continue work to demonstrably minimise data burden. • We will continue to improve our new provider portal. • We will implement changes to the Aggregate Offshore Record for data on transnational education. • We will meet our transparency obligations by publishing regulatory datasets and helping to reduce information gaps across the sector. • We will streamline published data and improve accessibility. • We will continue to explore and implement the use of AI for OfS operations.





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