Office for Students

Pye Tait Consulting

The OfS's Strategy 2025 to 2030 Consultation Analysis

A report by Pye Tait Consulting for the Office for Students

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Executive summary

Background

The Office for Students (OfS) has proposed a strategy for 2025 to 2030, which prioritises the student interest in an uncertain environment. The OfS's proposed strategy covers three priority areas: quality, the wider student interest, and sector resilience; underpinned by the cross-cutting theme of equality of opportunity.

The strategy outlines the OfS's strategic goals and actions and includes draft 'I statements' intended to help stakeholders, including students, understand what delivery of its strategic objectives would look and feel like for stakeholders. Further detail on the consultation and 'I statements' is available in Appendices 2 and 3.

A public consultation on the strategy was live from 12 December 2024 to 20 February 2025, gathering 97 unique responses. Alongside this, the OfS also ran four feedback events for higher education (HE) providers and students.

This report presents the findings from the independent analysis of responses and event feedback undertaken by Pye Tait Consulting. The OfS will publish a consultation response document alongside this analysis.

Key findings

The key findings are presented below. More detail is available on the respective points in chapter 2, along with other points raised by smaller proportions of respondents.

Views on the strategy

Support for the strategy. Many were in support of the strategy and agreed the three priority areas were broadly appropriate, while offering detailed feedback or constructive criticism.

Quality. While there was support for the integration of quality, many (40%) suggested the quality proposals could increase complexity or duplicate other data requirements and therefore requested clarity on how it would work in practice. Several queried the aims, purpose and added value of the Quality Risk Register, and again sought clarity on how it would work in practice. There was also a request among some for further detail on the role and future of the Teaching Excellence Framework (TEF) as quality regulation becomes more integrated.

Wider student interest. Sector support was requested from the OfS on student wellbeing. Some raised concern about regulatory scope creep in areas such as student accommodation. Respondents also stated that though students' mental and physical health are important, it is not necessarily the role of HE providers to provide clinical services.

Sector resilience. Many noted that challenges such as inflation and declining real-terms tuition income lie beyond the control of providers. Several welcomed the OfS's intention to monitor risks and trends more proactively, but stressed the need for efficient, streamlined and purposeful data collection. A third (33%) raised concern that new regulatory initiatives may compound existing burdens at a time when institutional capacity is already stretched.

Equality of opportunity. Overall, there was support for the strategy's approach to equality of opportunity, though a minority stated that this should be a standalone objective rather than a cross-cutting theme to highlight its importance in addressing access and participation gaps. Some said the strategy insufficiently acknowledges the complex challenges faced by some students.

Resource requirements for regulatory activity. A common theme among respondents was the perceived burden that providers could face and the additional resource that may be required that may be required to demonstrate compliance with regulatory requirements. Many queried whether proposals would impose costs that would divert capacity and resource from other important activities.

Implementation of the strategy. Nearly half (45%) requested more detail on how the strategy will be put into operation. Emphasis was placed on the need to avoid a one-size-fits-all regulatory approach, given the sector's diverse student and provider base. An overly standardised approach might, it was argued, adversely impact small and specialist providers in particular.

Sector collaboration. While respondents welcomed the strategy's collaborative tone, responses pointed to a strong desire for the OfS to work more closely and constructively with the HE sector. Students pointed out that students' unions and student-provider engagement are not directly referenced in the draft strategy and suggested that the final strategy should emphasise institutions' responsibility to conduct meaningful engagement with their students.

Recognition of diversity. Responses emphasised the need to recognise that students are not a homogenous group. Some urged the OfS to reflect varied student backgrounds, needs, and experiences in its strategy more explicitly. Respondents also raised the importance of diversity in provision and stressed that specialist providers may require flexibility from the OfS, specifically in relation to the TEF and the proposed quality measures, where it was stated that resource might be limited. This links to the overarching theme of resource requirements and perceived regulatory burden.

Unintended consequences of the strategy

Regulatory burden. Linked with the overarching theme of resource requirements, regulatory burden was a key area of concern. Just under a quarter (24%) said the strategy could increase burden and cost for providers, which may have a knock-on effect in terms of the quality of the students' experiences and the financial stability of institutions, should resources be diverted to meet regulatory requirements. Respondents considered this to present a particular risk to small and specialist providers with more limited resources.

Impact on student and provider diversity. Some raised concern that elements of the strategy appear to focus on 'traditional' pathways from HE into employment at the expense of alternative pathways that students from disadvantaged and underrepresented backgrounds are disproportionately likely to pursue. They raised concern that this lack of focus could inadvertently 'sideline' non-traditional career routes and lead to a contraction in support for students pursuing such opportunities. A regulatory framework that fails to accommodate the needs of providers delivering creative, vocational or entrepreneurial education was also seen to present a threat to the quality and sustainability of provision that equips students to pursue alternative careers.

Balancing quality and financial sustainability. Concern was raised about a perceived tension between the strategy's objectives relating to quality and financial sustainability, given providers are delivering within increasingly constrained financial parameters.

Alignment with legislation and regulation in other countries. In seeking to adhere to the OfS's proposals, concern was raised about breaching laws in overseas nations where students at England-based providers undertake transnational education. Respondents sought clarity from the OfS on managing this risk.

Aspects of the strategy respondents found unclear

Assessing quality. Some respondents requested more detail on the proposed quality assessment regime and its alignment with the TEF.

Data collection activities. Several requested more detail on the proposed approach to data collection. In the absence of this detail, respondents raised concern that data collection proposals may increase provider burden, with some reflecting on the need for the OfS to implement lessons learned from Data Futures.[1]

Quality Risk Register. Around a quarter (23%) asked for more information about how the register would be constructed and used in practice.

Views on the strategy's duration of five years

Broad support for the extended strategy period. The large majority (86%) agreed with the extension to a five-year period. Many said this would provide the sector with stability, particularly in a period of change and uncertainty, and also enable long-term planning.

Need to remain agile. Several emphasised the need for the strategy to remain flexible and responsive to political volatility and other uncertainties or emerging issues. Some also said the strategy should give greater weight to technological advancements and artificial intelligence, given these rapid changes.

Regular reviews. A third (33%) said the OfS should establish regular review points (every six or 12 months) to monitor progress and ensure the strategy remains fit for purpose.

A minority said five years is too long. A few respondents said extending the period from three to five years could result in a slower response to emerging issues.

Views on the 'I statements'

Mixed views. Many said the statements are appropriate and clearly describe the impact of the OfS's strategic objectives, but some described them as being of limited use or value.

Misunderstanding around the intended use of the statements. Several (30%) said the statements will be difficult to measure and queried how the OfS will use them in practice. Some also pointed out that the compound nature of some statements may problematically conflate issues, further complicating measurement. The intended use of the statements, however, is not to measure, but to articulate the OfS's strategic objectives in a more accessible format, particularly for students.

Wording amendments. While, overall, respondents approved of the statements, a third (32%) said refinements were needed, including more clearly defined language. Several

[1] Data Futures: Independent review - Office for Students

suggested amendments or additions to the institution statements to account for the performance of the OfS in its role as the regulator.

Student responsibility. Several respondents said students' responsibility to engage with their education should be acknowledged, and some suggested the inclusion of a reference to careers and readiness for work.

Institution and sector diversity. Some requested that the statements be adapted to different provider types or sizes, rather than taking a 'one-size-fits-all' approach. There were also suggestions for statements from the perspective of other stakeholder groups including small or specialist institutions, apprentices, non-taxpayers, whistleblowers, charities, and other bodies (such as the Office of the Independent Adjudicator (OIA)).

1. Introduction

1.1 Background

The Office for Students (OfS), the independent regulator for higher education (HE) in England, has set out its proposed strategy for 2025 to 2030. The OfS's focus during the previous strategy period, which ran from 2022 to 2025, was on ensuring HE institutions comply with its minimum requirements while incentivising excellence above those requirements. The 2025 to 2030 strategy proposes to prioritise the student interest in an uncertain environment. The OfS's draft strategy proposes to do this by:

- regulating to deliver continuous improvement in the quality of HE courses,
- extending its focus to areas of the student interest that affect students' ability to engage with and benefit from high quality HE, and
- supporting a resilient sector that is equipped to meet students' needs, now and in the future.

The views of prospective, current and former students informed the development of the strategy via polls, focus groups and engagement events across the country.

A public consultation on this strategy, intended to take account of stakeholders' views in the strategy development and to ensure a fair and transparent process, was live from 12 December 2024 to 20 February 2025. The consultation was open to anyone interested in responding, either as an individual, organisation, or group. The proposals covered three priority areas:

- **quality,**
- **the wider student interest, and**
- **sector resilience.**

A cross-cutting theme, **Equality of Opportunity,** underpins all three priority areas.

Within the strategy, the OfS outlines its strategic goals under each priority area, articulating the outcomes it wants to achieve in the next strategy period. The OfS also sets out strategic activities to achieve its strategic goals.

Alongside the strategy, the OfS consulted on draft 'I statements', which articulate what delivery of its strategic objectives will look and feel like for students, institutions, taxpayers and employers.

In early 2025, Pye Tait Consulting, an independent research agency, was commissioned to undertake an analysis of the consultation responses. This report presents the findings from the analysis of all responses received to the consultation.

The OfS will publish its own response alongside this analysis report, which will give a more detailed analysis of the considerations it has taken into account, including other information and factors that may not be mentioned in this report.

1.2 Aim and objectives

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

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

1.3 Methodology

1.3.1 Consultation approach

The OfS developed the consultation questionnaire which comprised six core questions to seek views on different aspects of the OfS's proposed strategy for 2025 to 2030 and the priorities laid out within it: overall comments on the strategy, potential unintended consequences of the strategy for providers or individuals, areas of the strategy that respondents found unclear, the duration of the strategy period, and the 'I statements'. The consultation questions can be found in Appendix 2, and the structure of this report mirrors that of the consultation. A summary of the responses for each question is provided at the start of each section throughout the report.

The consultation was open from 12 December 2024 to 20 February 2025. The main route through which to submit responses was the OfS online 'smart survey' portal. In total, 105 responses were received, of which 100 were received through the online portal, and five offline responses were received as documents by email. This included four blank responses and four duplicate responses, which were removed, leaving 97 unique, substantive responses for analysis (see section 1.3.2 below).

Alongside the consultation, the OfS also ran four feedback events – two for students and student representatives, one for anyone working at a further education college, and one for anyone working at a university or specialist education provider. Attendees could register for the events through the OfS's website, and a total of 150 participants attended. The sessions were facilitated by OfS members of staff.

The OfS shared all consultation responses with Pye Tait Consulting in line with OfS's privacy policy and data sharing agreement. The OfS also shared anonymised notes from the four feedback sessions. Pye Tait Consulting then undertook onward analysis of all responses and event notes.

In addition, the OfS held feedback sessions with representatives from mission groups, the Committee of University Chairs (CUC), Independent Higher Education (IHE) including its student advisory board, the National Union of Students (NUS), NHS England, Universities UK, Guild HE and the Association of Colleges (AOC). Feedback from these events is not included in this report, but will be considered alongside this report by the OfS.

1.3.2 Approach to the analysis

Before undertaking a detailed analysis, responses were first reviewed and cleaned. This process involved checking for errors, blank, duplicate, or co-ordinated responses. Four blank and four duplicate responses were found and removed, leaving 97 unique, valid responses for onward analysis.

Responses were analysed at an overall level, and sub-group analysis was undertaken to explore any notable differences by respondent type, however none were identified. Details of the grouping can be found in Appendix 1.

Qualitative analysis of the cleaned data was undertaken by Pye Tait Consulting in three successive stages.

a) A review of all responses to identify broad themes and sentiment.
b) Identification of key themes in relation to each question. Based on this, a coding framework was developed by Pye Tait Consulting, with checks for inter- and intra-coding consistency, and finalised in collaboration with the OfS.
c) A comprehensive review to code each response according to the coding framework, to identify the frequency of themes overall and by respondent sub-group.

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

1.3.3 Interpretations and limitations

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

It should be noted that collective responses represent the views of one organisation and that a single collective response may have received contributions from multiple individual or organisation members. Furthermore, it should be noted that some responses were received from sector bodies which therefore reflect the views of their memberships. Collective responses, including those from sector bodies, have not been weighted in the analysis. This means each response has an equal weight. The reader is advised to bear these points in mind when interpreting the report.

Each sub-section outlines the number of respondents providing views in response to that particular question. Numbers and percentages quoted relate to each consultation question being discussed, not to the overall total number of respondents. Furthermore, where a percentage is given to indicate a positive or negative sentiment, it cannot be inferred that all remaining respondents hold the opposite sentiment. For example, if 10% of respondents verbalised their support for a specific element of the strategy it is not to say that 90% of respondents oppose this. Rather, they have not voiced any opinion on this.

Some respondents provided comments which covered more than one of the themes that were identified as most commonly arising within each question and analysis. Responses for each theme or code were counted, meaning some responses were counted more than once per question as more than one theme or code was covered. The result is that numbers in the report may not sum to 100% due to cases where a respondent discusses multiple aspects within the same proposal.

Themes arising in response to each question are generally presented in order from most to least frequently mentioned, with the descriptors 'many', 'several', and 'some' being used in descending order to represent the prevalence of opinion from most to least prevalent for each sub-section.[2]

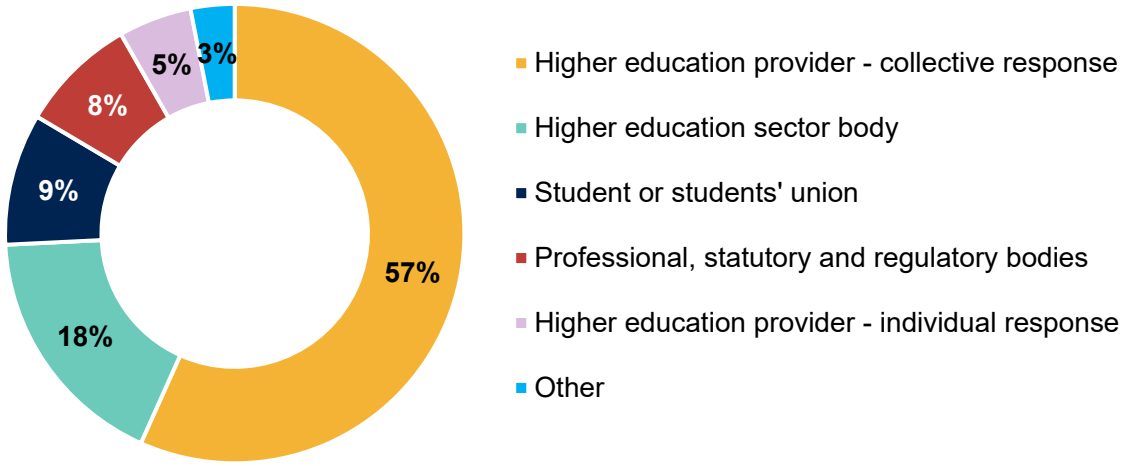
1.4 Respondent profile overview

Of the 97 responses analysed, the large majority (88, 90%) were submitted as collective responses (i.e. responses that represent the views of one organisation that may have received contributions from multiple individual or organisation members) and remaining responses (nine, 9%) were from individuals.

Respondents were manually assigned to a respondent category by Pye Tait Consulting in agreement with the OfS. Around three in five responses (55, 57%) are collective responses from HE providers, with a further five (5%) from individuals based at HE providers. 'Collective' responses are those where the consultation response was submitted on behalf of an organisation, not by an individual affiliated with that provider.

Around one in five (17, 18%) responses were from HE sector bodies. Just under one in ten responses (nine, 9%) were from students or students' unions and a similar number from professional, statutory and regulatory bodies (PSRBs) (eight, 8%). Three responses (3%) were categorised as 'other', these included responses from a charity, a 'whistleblower' and a former academic responding on behalf of a private organisation.

Figure 1 Breakdown of respondent types



Base: 97 respondents. Source: OfS consultation, 2025.

[2] Typically, 'most' is used where over 50% of respondents raise a point, 'many' is used where over 40% of respondents raise a point, 'several' where between 10% and 40% of respondents raise a point, and 'some' for points raised by 25% or fewer of respondents.

2. Key findings

2.1 Strategy overview

The three priority areas are quality, the wider student interest, and sector resilience. There are two strategic goals attached to each priority area. Equality of opportunity underpins all of these three areas. The proposed strategy can be found in full on the OfS's website.[3] A summary of the main elements is included below for readers' context.

The strategic goals set out under each priority area are as follows.

Quality

1. Students receive a high quality education that has a significant and enduring positive impact on their lives and careers, delivered by institutions that continue to improve the quality of their courses.

2. Prospective students have a range of high quality options and are well equipped to exercise informed choice about what, where, when and how they study.

Wider student interest

3. Students receive the higher education experiences they were promised.

4. Students benefit from rich and rewarding wider environments that help them to make the most of their time in higher education.

Sector resilience

5. A financially resilient sector delivers high quality higher education and student choice in the context of constrained finances.

6. Effectively governed institutions successfully navigate an environment of increased financial and strategic risk, enabling students to reap the benefits of higher education while giving taxpayers confidence that public funding is used appropriately.

Equality of Opportunity

The strategy aims to ensure that all students, regardless of their background, have access to high quality higher education and the support they need to succeed. This commitment to equality of opportunity underpins all three strategic priorities and is reflected in the specific actions proposed to promote high quality educational experiences and positive student outcomes.

How the OfS will regulate

In its proposals, the OfS also outlines how it will regulate. Full detail is available in the consultation documentation (linked to in appendix 2) and a summary is provided here.

[3] Consultation on OfS strategy for 2025 to 2030

The strategy commits to working collaboratively and communicating regularly with the sector as strategic plans take shape, including in relation to integrated quality and reforms to registration. It emphasises the role that students' views and experiences will play in shaping OfS regulation and underlines the importance of constructive relationships with institutions, based on trust, confidence and respect. The strategy commits to routine engagement with the sector on the major risks in the system, across quality, equality of opportunity and financial sustainability.

The strategy identifies the need to balance the benefits of regulation against the burden it imposes and commits to using timely data well to minimise data burden where possible, while continuing to protect students. It recognises the need to provide an efficient service and commits to a culture of continuous learning to deliver value for money for students, institutions and taxpayers.

2.2 Views on the strategy

Summary of responses of views on the 2025-2030 strategy

- **Support for the strategy.** Many were in support of the strategy and agreed the three priority areas were broadly appropriate, while offering detailed feedback or constructive criticism.

- **Quality.** While there was support for the integration of quality, many (40%) suggested the quality proposals could increase complexity or duplicate other data requirements and therefore requested clarity on how it would work in practice. Several queried the aims, purpose and added value of the Quality Risk Register, and again sought clarity on how it would work in practice. There was also a request from some for further detail on the role and future of the Teaching Excellence Framework (TEF) as quality regulation becomes more integrated.

- **Wider student interest.** The sector requested support from the OfS on student wellbeing. Some raised concern about regulatory scope creep in areas such as student accommodation. Respondents also stated that though students' mental and physical health are important, it is not necessarily the role of HE providers to provide clinical services.

- **Sector resilience.** Many noted that challenges such as inflation and declining real-terms tuition income lie beyond the control of providers. Several welcomed the OfS's intention to monitor risks and trends more proactively, but stressed the need for efficient, streamlined and purposeful data collection. A third (33%) raised concern that new regulatory initiatives may compound existing burdens at a time when institutional capacity is already stretched.

- **Equality of opportunity.** Overall, there was support for the strategy's approach to equality of opportunity, though a minority stated that this should be a standalone objective rather than a cross-cutting theme to highlight its importance in addressing access and participation gaps. Some said the strategy insufficiently acknowledges the complex challenges faced by some students.

- **Resource requirements for regulatory activity.** A common theme among respondents was the perceived burden that providers could face and the additional

resource that may be required to demonstrate compliance with regulatory requirements. Many queried whether proposals would impose costs that would divert capacity and resource from other important activities.

- **Implementation of the strategy.** Nearly half (45%) requested more detail on how the strategy will be operationalised. Emphasis was placed on the need to avoid a one-size-fits-all regulatory approach, given the sector's diverse student and provider base. An overly standardised approach might, it was argued, adversely impact small and specialist providers in particular.

- **Sector collaboration.** While respondents welcomed the strategy's collaborative tone, responses pointed to a strong desire for the OfS to work more closely and constructively with the HE sector. Students pointed out that students' unions and student-provider engagement are not directly referenced in the draft strategy and suggested that the final strategy should emphasise institutions' responsibility to conduct meaningful engagement with their students.

- **Recognition of diversity.** Responses emphasised the need to recognise that students are not a homogenous group. Some urged the OfS to reflect varied student backgrounds, needs, and experiences in its strategy more explicitly. Respondents also raised the importance of diversity in provision and stressed that specialist providers may require flexibility from the OfS, specifically in relation to the TEF and the proposed quality measures, where it was stated that resource might be limited (linking to the overarching theme of resource requirements and perceived regulatory burden).

When asked if they had any comments to make on the proposed strategy or the priorities set out within it, 95 respondents offered comments.

Overall levels of support

There were high levels of support for the proposed strategy among respondents and around two in five (40, 42%) explicitly stated that the three priority areas (quality, the wider student interest, and sector resilience) are appropriate and in line with the issues that the sector is currently facing. Of these, fifteen (16%) commended the strategy for its student-centric approach and prioritisation of the student interest. This support for both the strategy's student-centric approach, and the three priority areas, was echoed in feedback sessions.

A couple (two, 2%) said the strategy was too narrow and generally ineffective. Remaining respondents (55, 57%) offered more general comments or constructive feedback on the strategy without outlining clear support or opposition.

Four recommended the OfS should explain how it would build and maintain the expertise necessary to deliver the strategy.

The following discussion is divided into sections for each of the three priority areas (quality, wider student interest and sector resilience), the cross-cutting theme of equality of opportunity, as well as other overarching themes such as the OfS's proposed approach to implementation.

Quality

Many (38, 40%) expressed concern that the proposed quality reforms could lead to additional burden, particularly where multiple frameworks and data requirements overlap. Some respondents stated that providers are subject to many data requirements already and are concerned that the strategy will create additional burden for them. Examples provided include reporting B3 data, TEF data, and data on access and participation plans (APPs). Respondents emphasised that any expansion of quality oversight – such as the incorporation of new metrics or new risk registers – should not add unnecessary complexity or cost. They argued that layering new systems on top of existing ones could increase workload, without clear benefit.

There were high levels of support for a risk-based approach to quality regulation, with several (23, 24%) stating that it is proportionate and more efficient. Respondents encouraged the OfS to use provider risk profiles to tailor engagement and reduce oversight for those with strong records; this is viewed as being key to avoiding a one-size-fits-all model that could penalise high-performing providers. Within the feedback session, universities and specialist providers also suggested the OfS publishes a 'sector risk profile' on an annual basis.

A quarter (24, 25%) queried the introduction of a Quality Risk Register in terms of its necessity and clarity of purpose. They raised concern about potential duplication with existing regulatory mechanisms. Concerns included how the register would be populated, interpreted, and used in regulatory decision making. Respondents also identified parallels with the Equality of Opportunity Risk Register, calling for proper evaluation of this existing tool before launching a second. Some queried the reason for monitoring equality and quality via different registers if they are intended to be mutually reinforcing. Students in feedback sessions also requested clarification on how the Lifelong Learning Entitlement (LLE) would fit with the quality model.

> It is hard to comment on the proposed establishment of a Quality Risk Register and to understand the benefits this would bring to the regulatory environment. There is much further clarification required. We do not believe that a Quality Risk Register would add any value at institutional level – existing mechanisms such as the annual TEF data dashboard and other datasets provide value in identifying areas of risk within institutions. – HE provider, collective response

A few (seven, 7%) were more open to the idea of a Quality Risk Register, provided it was clearly scoped, co-designed with the sector, and used in a constructive manner. They suggested that it could help focus resources on areas of greatest need and support early identification of issues, but only if based on reliable and contextualised data.

A further 24 (25%) said that more clarity is needed around the role and future of the TEF, particularly in the context of the proposed shift to an integrated quality model. Respondents raised questions about how the TEF would relate to baseline quality assessments, how metrics would be interpreted, and whether the framework could adapt to small, specialist, or flexible provision. The TEF was also discussed in student feedback sessions, where participants urged the OfS to consider whether the TEF assessments adequately incentivise institutions to support students from disadvantaged backgrounds.

Seventeen respondents (18%) offered their support for a single, integrated quality model, arguing that the current quality assurance landscape is fragmented and confusing, with different processes operating under separate frameworks. However, respondents emphasised that a new model must be consulted on and co-designed with the sector.

Proposals to explore alignment with the European Standards and Guidelines (ESG) for quality assurance were positively received by 17 (18%) respondents. Respondents noted the potential for alignment to support international recognition and facilitate student mobility. Some respondents viewed ESG alignment as a route to rebuilding confidence in English HE, but cautioned that the associated processes must be implemented proportionately and not add to regulatory burden.

> We strongly support the explicit commitment to consider realignment with the ESG for quality assessment. This is welcome progress on an issue of importance to the sector not only in England, but also across the UK. – HE sector body

Some raised concerns regarding transnational education (TNE). While these respondents were supportive of maintaining a high quality system that protects the interests of students taught abroad, there is a perceived risk that meeting the OfS's requirements may break the law in some countries. One respondent pointed out that most TNE is also subject to regulation in the country where the provider operates, which may be incompatible with OfS regulation.

The proposal to focus more on quality enhancement was welcomed by 14 (15%) respondents. While this was considered an opportunity to foster innovation, support educational development, and improve student outcomes, respondents advised that true enhancement requires sector trust, collaboration, and time – which cannot be imposed via regulation. There was also concern that enhancement activity could become overly metrics-driven if tied too closely to regulatory performance. Within feedback sessions, universities and specialist providers emphasised a need to celebrate the positive work of HE providers to counter a perceived narrative focus on financial resilience and weak performance within the strategy.

Some (13, 14%) called on the OfS to specify how the new quality regime would reduce existing burdens in the sector, noting that the strategy fails to provide sufficient detail on this. Greater transparency was requested on what activities would continue or be deprioritised, how data would be used, and how duplication with other bodies would be avoided.

Five (5%) highlighted that institutions may be forced to reallocate limited resources from core teaching and support functions to meet expanded quality requirements. This was a particular concern among small and specialist providers, who may have less capacity to absorb additional regulatory requirements.

In feedback sessions, students commented that the strategy should commit to a holistic approach to quality, considering the entire student journey and the full range of student experiences, not just those of full-time, campus-based students. Students highlighted the importance of low staff-student ratios, high quality facilities, authentic assessments and opportunities to gain practical experience, build portfolios and network. They also identified the need to ensure quality and thus value for money from franchise institutions. Students also perceived a gap between what institutions offer and what employers are looking for and discussed how soft skills (such as communication, teamwork, and problem-solving) are often developed through extracurricular activities which are seen to be at risk as institutions look to cut costs.

Wider student interest

Just over a quarter (25, 26%) highlighted the importance of recognising the varied nature of the student interest – students enter HE with different goals, backgrounds, and support needs, and the OfS must take account of this diversity in its regulatory approach.

Respondents cautioned that the student voice is not homogenous, stressing that regulation must accommodate a range of learner journeys and aspirations. In feedback sessions, students echoed this. They discussed the impact of financial constraints on students from lower socio-economic backgrounds, and emphasised the need for tailored support for other groups including neurodivergent students, those from disadvantaged backgrounds, and students who need to balance studying with their personal commitments (including part- or full-time work and caring responsibilities).

A few (four, 4%) raised concern that the strategy's framing of the student interest appears to be overly focused on undergraduate provision. Respondents pointed to the distinct experiences and expectations of postgraduate taught (PGT) and postgraduate research (PGR) students. They emphasised the need for a tailored regulatory approach which reflects their expectations in relation to supervision, funding, and career pathways.

In their feedback session, universities and specialist providers said the strategy should hold institutions to account for the support they provide to disabled students. Students also raised the importance of training to ensure those with protected characteristics receive the support they need, particularly those with mental health conditions and those that are neurodivergent. Meanwhile, college representatives highlighted that the student experience within the college setting is very different to that at university – something they said is not currently reflected in the strategy.

Several respondents (19, 20%) asked the OfS to acknowledge the experiences of various student groups, such as apprentices, commuter students, mature learners, and those undertaking professional or industry-based courses. They pointed out that such students engage with HE in 'non-traditional' ways and may face different barriers. They suggested that a strategy which fails to account for these differences risks excluding or underserving these groups.

> We advocate for a fuller understanding of the plurality of student interests, which differ according to when, where, what and how learners study, as well as the diverse experiences they bring with them into HE. – HE sector body

A fifth (19, 20%) acknowledged the importance of student wellbeing, but raised questions about the role of the OfS. While mental health support is recognised as critical to student success, respondents from universities and colleges cautioned that institutions are not healthcare providers and should not be expected to deliver clinical services. They requested that the OfS supports the sector through sharing good practice, encouraging collaboration with the NHS, and promoting clarity around reasonable expectations for institutional support.

Further, a few (seven, 7%) raised the issue of shortfalls in NHS and public sector provision, particularly in relation to mental health services. They reflected that institutions can be left to fill these gaps with insufficient funding or expertise, creating unrealistic expectations and risk for both staff and students. Respondents emphasised that systemic healthcare challenges should not be offloaded onto HE institutions and that the OfS should focus on supporting a joined-up approach across the HE and health sectors, convening relevant stakeholders such as UCAS, HESA/JISC, and the NHS.

> We have been plugging school attainment gaps, providing clinical mental health support to backfill NHS capacity and battling against cost of living challenges where student income is not keeping up. Our efforts so far have led to a narrowing of the equality gap despite stretched resources. The OfS should be realistic in how HEIs [higher education institutions] can continue to provide these activities and the resources that we must use to support our current students. – HE sector body

One in six (17, 18%) expressed concern about regulatory scope creep, with respondents arguing that the OfS is moving beyond its core remit in proposing to prioritise the wider student interest. Areas such as student accommodation and cost of living are viewed as outside of the control of providers and therefore not appropriate for regulatory intervention. Respondents urged the OfS to be clear about the boundaries of its role and to avoid duplicating the work of other public bodies.

Some (11, 12%) raised concerns about potential legal overlap, particularly in relation to consumer protection. Respondents queried the OfS's proposal to seek new enforcement powers, highlighting the roles of organisations such as the Competition and Markets Authority (CMA), the Office of the Independent Adjudicator (OIA), and National Trading Standards. Further clarity was requested to avoid confusion and regulatory duplication around students' rights.

Within the feedback session, some universities and specialist providers supported a focus on these non-academic issues, suggesting that smaller providers could use this as a mechanism to encourage change and improve those services within their institutions, while at the same time emphasising that smaller providers should not be penalised for their inability to provide additional support due to limited resources.

Meanwhile, during feedback sessions college staff discussed the potential impact of recruitment practices designed to increase student numbers (such as unconditional offers and the lowering of admission standards). They said that if institutions are insufficiently equipped to support students with lower academic attainment this can have a negative impact on student mental health, as students struggle to cope with academic demands. They also warned that this practice can impact the quality of teaching, as educators may need to adjust their lessons to accommodate students who are not fully prepared for the course. Colleges questioned how the OfS plans to address these issues to ensure students are adequately supported.

Some respondents (15, 16%) noted that non-academic factors, such as individual financial circumstances for those from a lower socio-economic background, can have a substantial impact on students' ability to succeed. Respondents stressed that these factors are often beyond the control of individual providers. They encouraged the OfS to recognise the complexity of these factors and to avoid an approach that holds institutions accountable for outcomes driven by broader economic or social conditions.

Sector resilience

Many (40, 42%) argued that some of the challenges facing the HE sector – such as declining income, inflationary pressures, and changes to international student demand – lie beyond institutional control. They urged the OfS to acknowledge the broader economic and political context within which providers operate, cautioning against making institutions accountable for issues shaped by government decisions and wider societal factors.

> We agree with the priority afforded to financial sustainability and sector resilience, but this needs to be contextualised with the financial pressures that are beyond the control of HEIs, not least the decline in value in real terms of the 'tuition fee', the increase in pension contributions, and the increase in NI contributions. – HE provider, collective response

Within feedback sessions, college representatives emphasised the importance of sector resilience, stating financial sustainability has been a longstanding concern of further education colleges. They identified resilience as foundational to achieving other strategic priorities and said that the OfS's strategy should support financial sustainability and

adaptability in the face of change. Universities and specialist providers, on the other hand, highlighted the challenge of achieving strategic goals in the context of financial constraints, and emphasised that the regulatory approach ought to be supportive, not punitive.

A third (31, 33%) expressed concern that new regulatory activities proposed in the strategy could compound existing burdens at a time when institutional capacity is already stretched. Respondents questioned whether the OfS has fully considered the resource implications of expanding oversight, calling for new initiatives to be delayed unless clear benefits can be demonstrated.

> There should be explicit reference to using resources effectively. This would include ensuring that the regulatory burden is appropriate and that regulatory duplication is targeted and minimised. – HE provider, collective response

Several (21, 22%) welcomed the OfS's intention to monitor risks and trends more proactively, including in relation to financial health and potential course or provider closures. However, respondents highlighted that closer engagement with providers is needed to anticipate and mitigate risks before they materialise. Furthermore, while improved financial oversight was welcomed in principle, some (19, 20%) stressed the need for more efficient, streamlined, and purposeful OfS data collection processes. Respondents reflected critically on Data Futures, resulting in scepticism about the OfS's ability to deliver on these objectives. Therefore, they urged a clearer explanation of how data collection would be rationalised and used effectively.

Twenty (20, 21%) supported a focus on good institutional governance, particularly in light of increasing financial risk. However, respondents were concerned that the OfS could become overly prescriptive in how governance should be structured or monitored, arguing that responsibility for assuring good governance lies with other bodies, such as the CUC. One respondent suggested that institutions should be free to establish management and governance models that best fit their individual circumstances while also meeting the requirements of the conditions of registration. It was also stated that better alignment and collaboration with existing governance frameworks could help avoid duplication.

Some urged the OfS to make greater use of data already held by institutions or collected via other regulatory bodies. Respondents expressed support for the 'collect once, use many times' principle, cautioning against the introduction of parallel reporting processes without clear added value.

Further, just under one in ten respondents (nine, 9%) specifically said that the OfS should take a more active role in monitoring and managing risks around provider or course closures. Respondents welcome the strategy's recognition of this issue, emphasising that effective contingency planning is critical to student protection and sector stability.

Some referred to the Data Futures initiative,[4] delivered by the Designated Data Body, describing it as flawed, burdensome, and a source of considerable staff stress and institutional cost. Respondents asked for a review of lessons learned, to ensure that any future data reforms are operationalised more effectively.

> We strongly recommend that the OfS first undertakes a lessons learned approach from the recent Data Futures programme with the sector, to assess any future requirements carefully and avoid any further challenges in the sector. – HE provider, collective response

[4] Data Futures Programme

A few respondents expressed concern that further increases to OfS registration fees would not be sustainable. They said that as institutions have limited ability to raise their own incomes, growing regulatory fees risk undermining their financial position.

Equality of opportunity

Overall, there was support for the OfS's proposed approach to equality of opportunity, though a minority said that this should be a standalone objective rather than a cross-cutting theme to highlight its importance in addressing access and participation gaps. These respondents said that the framing of equality of opportunity within the strategy risks diluting its importance, and that the OfS ought to more clearly articulate its vision for equality of opportunity and demonstrate how it will influence regulatory decision making. This view was echoed in the feedback session with universities and specialist providers, where participants recommended the strategy should more clearly emphasise the importance of institutions having clear governance structures that enable equality of opportunity. This, it was argued, would enable institutions to adequately prioritise this issue and ensure that providers adopt a comprehensive approach.

> We found a lack of consideration for the access of underrepresented groups throughout the consultation with minimum reference to the enforcement of Access and Participation Plans. Whilst it is noted that equality underpins the strategy, this should be explicitly outlined and tangible expectations of institutions set when it comes to the principle. – Student or students' union

A fifth (19, 20%) commented that the strategy insufficiently acknowledges the complex challenges faced by disadvantaged and underrepresented students, particularly in terms of participation, continuation, and attainment. Respondents said that widening access often requires significant institutional investment, which is becoming harder to sustain in a constrained funding environment. They requested that the OfS provides stronger support for an inclusive education and regional provision that targets participation cold spots.

Some said that the OfS could play a more proactive and enabling role in advancing equality of opportunity, beyond monitoring APPs. Suggestions included the use of sector data to identify and share effective practice, and deeper engagement with providers to co-develop solutions.

Resource for regulatory activity

As a cross-cutting theme throughout responses, many consultees raised concern around the resource requirements to conduct regulatory activity, with requested changes to the strategy often being linked back to this overarching theme.

For example, around one in ten (11, 12%) raised concerns about the rising costs of regulation; respondents raised concern that resources spent on regulatory compliance divert time and funding away from teaching and student support. One respondent referenced the 18.5% registration fee rise (2023), citing it as evidence of growing financial strain imposed by the regulator.

Others raised concern that the strategy's proposal to explore alignment with the ESG could result in additional resource requirements being imposed on institutions, unintentionally adding burden.

Similarly, respondents highlighted the resource that would be required to undertake activities such as data collection.

> Whilst gaining access more frequently to data is commendable, we fear this approach could potentially increase the regulatory burden placed on institutions. We would therefore appreciate some clarity on the data the OfS intends to use (what, when, how, to what basis, to what standard, etc.), as well as some clarifications on how the OfS intends to work in partnership with the sector to define the set of data that will be used. – HE provider, collective response

Further concerns about the resource requirements of regulatory activity are captured in section 2.3 of this report, which analyses respondents' views about the unintended consequences of the strategy.

Implementation of the strategy

Many respondents (43, 45%) requested more detail on how the strategy will be put into operation, a point echoed in the feedback session with universities and specialist providers. While the goals are broadly seen to be appropriate, some stated that the strategy is unclear about what the OfS will actually do to meet these aims. There were particular concerns that the ambitions around quality reform, student engagement, and sector resilience are underpinned by vague commitments rather than concrete plans, making it difficult for providers to plan or prepare.

Just over one fifth (21, 22%) questioned whether the OfS has the internal capacity and capability to deliver such an ambitious strategy, especially in light of recent decisions to pause accepting applications to register with the OfS, and for degree awarding powers (DAPs) and university title Respondents stated that this pause indicates an overstretched organisation, raising doubts about the feasibility of new workstreams such as the integrated quality model or enhanced student protection activity. Within their feedback session, universities and specialist providers also highlighted the need for the strategy to flex in response to financial challenges while maintaining business as usual activity, such as registration and DAPs.

A similar proportion (14, 15%) said that the strategy is overly ambitious and lacking a clear sense of prioritisation. These respondents stated that the strategy attempts to cover too many areas, with strategic priorities used as broad containers for many objectives and activities. It was recommended by these respondents that the strategy should include clearer prioritisation and recognition of resource constraints (both within the OfS and across the sector).

Collaboration

Many (37, 39%) stated the importance of the OfS working more closely and constructively with the HE sector. There was a clear message that regulatory success, in their eyes, is dependent on meaningful engagement with providers, i.e. genuine partnerships extending beyond consultation.

> Championing student interests in an effective way requires, in our view, close collaboration and partnership working between the sector and the OfS. We would therefore appreciate some clarity on how the OfS intends to work in partnership with both individual institutions and the sector as a whole. – HE provider, collective response

Approximately a quarter (22, 23%) said that they welcomed the collaborative tone of the strategy, with respondents seeing this as a positive shift from previous engagements with the OfS. Respondents also stated support for the strategy's commitment to sector engagement and working with networks to share best practice. They expressed interest in seeing the practical changes that result from these aspirations.

Several (18, 19%) acknowledged that the OfS has made efforts to improve relationships with providers, e.g. through increasing communication and engagement, but stressed that further progress is needed, particularly in ensuring consistency in OfS communication, transparency in decision making, and openness to sector feedback.

In their feedback session, universities and specialist providers requested more information about how the strategy aligns with objectives and priorities of government departments and relevant agencies, such as Skills England. They argued that a more joined-up approach would help the sector, employers, and the government work together to anticipate and respond to market demand for skills.

Meanwhile, students noted that students' unions (SUs) are not mentioned in the strategy. They advocated for their inclusion given the important role they play supporting students as a critical friend to institutions. They emphasised the need for regulatory support to enhance collaboration between institutions and SUs, and expressed concerns about reduced funding impacting SUs' ability to support students.

Students also reported a lack of meaningful engagement between institutions and the student body. While acknowledging institutions gather feedback via surveys, these are often perceived to be a box-ticking exercise. Students therefore suggested the strategy emphasise institutions' responsibility to conduct meaningful engagement with their students. They also suggested the OfS could raise its profile among students, given institutions often make decisions based on OfS information and data. This, it was argued, would improve transparency and help ensure that the efforts of both the OfS and student bodies complement each other.

A few (four, 4%) also suggested that the OfS could play a valuable role in supporting knowledge exchange and the sharing of good practice across the sector, particularly in areas such as student support and risk management.

Diversity of HE provision

Emphasis was placed on the need to avoid a one-size-fits-all regulatory approach (26, 27%). Respondents discussed how the HE sector comprises a wide range of providers with different sizes, student populations, and specialisms, and stressed that regulation should be proportionate and contextual, particularly to ensure that smaller, specialist, or alternative providers are not disadvantaged by requirements. This was echoed by college staff in their feedback session, who emphasised the importance of maintaining diversity within the sector by ensuring the regulatory requirements placed on small and specialist institutions are appropriate. Respondents stated the strategy could more clearly recognise the unique challenges and strengths of different institutions to outline how proposals will apply to different institutions.

> At present, it is felt that the current regulatory approach does not adequately support diversity in higher education. This is not just an issue of an institution's size but also the varied aspirations and institutional missions, with some HEIs focusing on unique and specialised education. Unfortunately, the current proposed strategy does not clearly reflect this necessity. – HE sector body

Just under a quarter (23, 24%) commented on a shift towards non-traditional learning models, including online, blended, modular, and short-course provision. These respondents anticipate that the OfS will need to adapt its regulatory framework to accommodate and support these developments, especially in light of the LLE. Respondents highlighted the need for the strategy to be future-focused and enabling, rather than constraining, to allow innovation in course delivery and design. This was echoed in feedback sessions with colleges and universities and specialist providers, who said the strategy focuses too heavily on maintaining the status quo and instead needs to be more forward-looking and innovative to preserve global competitiveness, enabling institutions to identify and implement new technologies and delivery models.

> We also recommend a more thorough description of how AI will impact the higher education sector. Concerns vary from the consistency of institutions' approaches and the impact of AI on assessment plagiarism and teaching. – Student or students' union

Indeed, some respondents – including students – specifically noted the lack of attention to AI and broader technological innovation in the proposed strategy and urged the OfS to acknowledge AI's growing role in teaching, learning, and assessment. They said the OfS should work collaboratively with the sector to understand both the risks and opportunities.

> We wholeheartedly endorse using AI and robotic automation to enhance efficiency and the student experience. It will, however, be important that guidance and funding are provided to support this ambition as this is a rapid and evolving area of technology. – HE provider, collective response

Broader concerns and considerations

Some emphasised the importance of institutional autonomy and warned that excessive regulation could threaten institutions' ability to make independent decisions. Autonomy was considered key to maintaining the diversity and innovation of the sector. A small number of respondents said the current strategy risks undermining this principle through overly prescriptive regulation and should focus more on outcome-based metrics.

A small minority said the OfS ought to be more accountable for its actions, and called for clear mechanisms to assess how well the regulator is performing in terms of its strategic delivery, cost efficiency, and engagement with the sector. A few also sought further information on how the OfS plans to monitor the impact of its new proposals, including in relation to how success will be defined and measured.

Some raised concerns about the OfS's perceived lack of independence from political influence. They said the strategy is influenced to an extent by the government's political priorities and recommended that the OfS reaffirms its autonomy by ensuring that regulation remains stable and independent of short-term political shifts.

Some gave explicit support to strategy proposals to support transparency in the assessment and monitoring of financial sustainability, arguing this is essential to ensuring that placement availability and quality are not compromised. Some respondents sought clarity as to the role of the OfS in securing work placements, which form a core part of health education pathways.

Other comments

Other comments, each from three respondents:

- urged consideration of providers that operate across the devolved nations, and therefore interact with other regulatory systems across the UK,
- raised questions about whether the OfS should become a prescribed body for whistleblowing, with respondents pointing out that this may cut across other regulatory jurisdictions. Should it go ahead, respondents emphasised the need for working closely with providers, and
- requested further guidance related to harassment and sexual misconduct, with respondents saying that current guidance fails to sufficiently prepare staff and students for upcoming changes.

2.3 Unintended consequences of the strategy or priorities set out within it

Summary of responses on unintended consequences of the strategy or priorities

- **Regulatory burden.** Linked with the above overarching theme of resource requirements, regulatory burden was a key area of concern raised. Just under a quarter (24%) said the strategy could increase burden and cost for providers, which may have a knock-on effect in terms of the quality of the student experience and the financial stability of institutions, should resources be diverted to meet regulatory requirements. This was stated to present a particular risk to small and specialist providers with more limited resources.
- **Impact on student and provider diversity**. Some raised concern that elements of the strategy appear to focus on 'traditional' pathways from HE into employment at the expense of alternative pathways that students from disadvantaged and underrepresented backgrounds are disproportionately likely to pursue. They raised concern that this lack of focus could inadvertently 'sideline' non-traditional career routes and lead to a contraction in support for students pursuing such opportunities. A regulatory framework that fails to accommodate the needs of providers delivering creative, vocational or entrepreneurial education was also seen to present a threat to the quality and sustainability of provision that equips students to pursue alternative careers.
- **Balancing quality and financial sustainability.** Concern was raised about a perceived tension between the strategy's objectives relating to quality and financial sustainability, given providers are delivering within increasingly constrained financial parameters.
- **Alignment with legislation and regulation in other countries.** In seeking to adhere to the OfS's proposals, concern was raised about breaching laws in overseas nations where students at England-based providers undertake transnational education. Respondents sought clarity from the OfS on managing this risk.

When asked for their views on potential unintended consequences of the strategy or priorities set out within it, 83 respondents offered comments.

Regulatory burden

Just under a quarter (20, 24%) said that the proposals within the strategy could increase burden and cost for providers. They discussed how this would pose a potential threat by negatively impacting the quality of the student experience and institutions' financial stability, should additional funding and resources need diverting to meet regulatory requirements. Some (11, 12%) linked this topic with the decline in the real-terms value of the undergraduate tuition fee. This was stated to present a threat to some forms of provision and identified as a driver of the financial pressures institutions face.

In the feedback session, some universities and specialist providers echoed this sentiment, reflecting that the scope of the strategy would lead to increased regulatory burden for universities and colleges without clear benefits. They would welcome clarification from the OfS on the mitigation it will put in place to minimise burden and duplication. Related to this, colleges queried the need for additional regulation by the OfS in areas already covered by other bodies such as the CMA, Ofsted and OIA.

> It is important that there is a balance between ensuring effective governance of quality and maintaining oversight of risk and placing regulatory burden on providers. – HE provider, collective response

On this, a few sought clarity from the OfS regarding how to balance the increase in regulatory demands within the strategy (for example, the proposal to collect financial and student data more frequently), while ensuring that such compliance does not divert resources to the detriment of core educational activities.

Some suggested the strategy would be more costly and burdensome for small and specialist institutions in particular to implement. Such providers said that the current regulatory regime is disproportionately burdensome and costly for them. This concern was also raised during the feedback session for colleges, who stated that the strategy could inadvertently favour larger, 'traditional' institutions at the expense of smaller and specialist institutions with more limited resource and fewer opportunities for economies of scale.

Further, some (six, 7%) small or specialist providers identified a risk that institutions with strong international reputations may become vulnerable to enforced mergers with larger multi-disciplinary providers if there are perceptions that they are unsustainable or inefficient.

A few also pointed out that an increase in governance and perceived burden might deter prospective providers from entering the registered sector, potentially in geographic areas lacking provision for students.

Some respondents commented on a potential increase in administrative burden for university and college staff. During their verbal feedback session, universities and specialist providers shared concern about the impact of increased regulatory burden on the health and wellbeing of their staff. Respondents sought clarity as to how the OfS has considered and sought to mitigate this impact while developing the strategy. Concern was raised that increased financial data collection, regulation of partnerships, and participation in the TEF could have a disproportionate impact on administrative staff in terms of creating a significant workload burden. Moreover, respondents reflected how, for small and specialist institutions, this could place significant pressure on a small full-time workforce, creating unmanageable

workloads for key individuals, detrimentally impacting their health and wellbeing, with a negative impact on staff recruitment and retention.

Impact for student and provider diversity

Around a quarter (22, 27%) stated that the strategy is overly focused on 'traditional' HE pathways into employment and should better reflect the interests of students seeking to pursue alternative career pathways (such as freelance work or self-employment). Some pointed out that such pathways are more commonly pursued by care leavers, mature learners, and those from underrepresented backgrounds (those from minority ethnic backgrounds, those with disabilities, and those from lower socio-economic backgrounds). Therefore, a focus on traditional HE pathways into employment could risk exacerbating inequalities. Respondents said that the focus on 'traditional' pathways from higher education into employment, at the expense of alternative pathways, may lead to a contraction in alternative pathways and reduce opportunities for students wishing to pursue these.

> The focus on traditional pathways into employment may inadvertently sideline alternative career routes such as freelancing, self-employment, and entrepreneurial activity. This could disadvantage students who pursue non-traditional employment, particularly as data shows a growing number of students engage in entrepreneurial activities during their studies. Failure to address this trend may result in insufficient support for a significant and diverse cohort of students seeking flexible, innovative career paths. – Professional, statutory and regulatory body

> The OfS strategy could be enhanced by recognising the importance of innovative delivery methods that cater to the diverse needs of students. Learning models that prioritise flexibility, such as block scheduling, allow students to balance work, family, and academic commitments effectively. This is common practice, for example in the Australian HE sector. The OfS should actively learn from such evidence-based innovations to shape a strategy that supports diverse, non-traditional pathways to success. – HE provider, collective response

In addition, one provider suggested the strategy could mention specific support that should be provided by HE institutions to students who come to HE from non-traditional education backgrounds. They commented that many of its students come from migrant communities and non-traditional educational backgrounds, hence 'flexible and alternative learning pathways are a necessity in order to engage and improve their learning outcomes in addition to high quality language support'.

Universities and specialist providers expanded on this point in their feedback session, explaining that a focus on success outcomes might inadvertently penalise institutions that serve higher numbers of students from disadvantaged backgrounds and underrepresented groups, and may deter institutions from recruiting them in future. It was thus suggested that the OfS takes a more inclusive approach that explicitly recognises different career pathways.

Some raised concern that the strategy might negatively impact students' experience if it is not reflective of the diverse range of student experiences. Students themselves echoed this in feedback sessions, raising concern that the strategy focuses on traditional, full-time, campus-based students and does not sufficiently account for students at institutions with different delivery methods (e.g. remote learners, part-time students, working students and those with caring responsibilities). Three respondents (4%) suggested that a 'one-size-fits-all' approach should be avoided given this diversity in student experience to minimise barriers to access, engagement and attainment. Indeed, around a fifth (15, 18%) stated that the strategy may negatively impact the diversity of the sector and that the strategy's risk

management approach could better reflect the diversity in provider type to provide support for different institutions, and hence the diversity of student experiences. One institution (1%) suggested including The Open University on the OfS's provider panel, which is home to a unique student population that includes adult, part-time and distance learners.

Two (2%) perceived gaps in the strategy around student mental health issues, with one suggesting the strategy should pay more attention to preventable student deaths and the other requesting guidance regarding mental health support for disabled students. Two (2%) also raised concerns around student safety. One said that the strategy lacks a framework for reporting and addressing discrimination, especially for Jewish students, and the other requested more protection for whistleblowers.

In feedback sessions, students expressed concern that the framing of the 'wider student interest' section within the strategy may suggest to institutions that these issues are secondary and less important.

Balancing quality and financial sustainability

One in five (17, 20%) stated that the strategy could better reflect the balance between quality and financial sustainability, pointing out that institutions are delivering high quality teaching with increasingly constrained finances.

A small minority stated that while institutions should make reasonable adjustments for different learner needs, it is neither financially viable nor practical for all students to be entitled to a fully personalised experience.

In the feedback session with universities and specialist providers, participants also suggested that the OfS should work to generate confidence in financial sustainability of the sector so that institutions do not feel compelled to take unnecessary actions if they are not at risk.

> Students face an increasingly expensive university experience, with financial support limited and the cost of living continuing to rise. Not only does increased financial support for students mean universities will have to increase expenditure, the emphasis in the strategy on academic quality suggests greater financial investment into student services. – HE sector body

2.4 Strategy clarity

Summary of responses on aspects of the strategy respondents found unclear

- **Assessing quality.** There were requests from some for more specificity on the proposed quality assessment regime and its alignment with the TEF.
- **Quality Risk Register**. Around a quarter (23%) asked for more detailed information about how the register would be constructed and used in practice.
- **Data collection activities.** Several requested more detail on the proposed approach to data collection. In the absence of this detail, they raised concern that data collection

proposals may increase provider burden, with some reflecting on the need for the OfS to implement lessons learned from Data Futures.

When asked whether any aspects of the proposals were unclear, 80 respondents offered comments.

Assessing quality

Around one in six (12, 15%) respondents sought more detail and specificity on the scope of the proposed assessment regime for quality. Respondents sought clarity and transparency regarding the decision-making process, as well as further detail on the frequency and nature of assessments e.g. in-person qualitative assessments or via monitoring and data sharing.

> The strategy notes that assessment activity will be 'more routine and more widespread' - will this be based on risk alone, or will assessment become due on a cyclical basis, like Ofsted? – HE provider, collective response

It was pointed out that different groups (e.g. students, staff) may define quality differently, and some (10, 13%) therefore requested greater transparency on what integrated quality could look like in practice, including, for example, in relation to specific changes to the assessment process. Universities and specialist providers also discussed this in their feedback session, with participants seeking to better understand what an 'integrated approach' means and how it would fit with existing interventions such as the Equality of Opportunity Risk Register and the TEF.

Connected with this was a request for more detail on the Quality Risk Register (QRR) by around a quarter (18, 23%) of respondents. Respondents were unclear as to how the register would be constructed, populated, and used in practice. Clarity was also sought on how the QRR would fit into the wider quality structure, and how the QRR would add further value above mechanisms the OfS already uses to assess and regulate quality. To mitigate this, these respondents stated that more formal engagement and consultation with the sector is needed to develop the QRR further, with one suggesting that evaluating the Equality of Opportunity Risk Register could inform the development of the QRR. Similar questions were raised by colleges during their feedback sessions, with participants requesting more specific detail on the proposed timeline for a QRR and how it would be implemented.

A few said that a clearer definition of 'quality' is needed, and wanted to know if the QRR would include contextualised benchmarks.

Others queried whether the integrated quality model would include PGT courses, and wanted to understand the effect of this on the TEF timeline. Some respondents sought to understand the implications of strategy proposals for the TEF, and what the OfS means by TEF assessment activity becoming more widespread and routine.

Some respondents asked how quality assurance would align with ESG of the European Higher Education Area 'in the absence of a common regulatory and quality assurance system across the UK nations', with a particular focus on implications for partnerships and apprenticeships. One respondent requested more information about what incorporating TNE would mean for the approach to quality in practice.

A few respondents also requested more information regarding how proposed changes would impact assessment protocols, with one seeking clarification on the scope of the proposed new assessment regime. They sought to understand what types of partner provision may be

included, and how arrangements would align with local quality assessment regimes in other countries.

> There are questions about whether overseas campuses will be assessed for quality under the same framework as domestic institutions. – HE provider, collective response

Similarly, one respondent stated that, while it is important to ensure assessments and accreditations align with employer needs, the emphasis in the proposed strategy on employer engagement was concerning. They stated that providers are required to navigate accreditation requirements from PSRBs alongside attempting to meet the expectations of employers. They would be concerned if the OfS's desire to improve employer engagement resulted in insufficient accountability for the PSRBs' frameworks, as this could result in conflicting demands, and increasing burden through duplication and parallel reporting.

Data collection activities

Some said that more information should be included in the strategy regarding the approach to data collection and management. Respondents asked how predictive and lead indicators will be developed, used and contextualised. They sought to understand what is meant by 'real-time' data and how this will be collected. They argued this could have major implications for how institutions provide data for regulatory purposes.

In their feedback session, universities and specialist providers broadly supported the strategy's emphasis on real-time data and student insight, given lagged data does little to help institutions deliver continuous improvement. However, echoing other respondents' views, they requested clarity on the implementation of real-time data collection activities.

Some sought clarity regarding the management of data, such as timelines for providers to respond to data requests, particularly given the challenges experienced when implementing Data Futures.[5]

There was a perception among some of a lack of appreciation in the strategy regarding the risks involved in collecting and using data, especially in terms of data security. In particular, respondents sought assurance that additional data requests would be communicated clearly, with more transparency regarding why the data are necessary and how they will be used by the OfS.

A couple of respondents said that more explicit data sharing practices between schools and universities and colleges would enhance HE institutions' ability to address student challenges.

Sector resilience

Some (eight, 10%) said that more information on OfS plans for measuring financial resilience would be beneficial. For example, they requested more detail as to how the OfS will continue monitoring and supporting the financial health of the sector so that preventative and early support measures are provided for institutions most at risk of market exit. Six institutions requested more advice on navigating mounting financial risks effectively.

[5] HESA: Data Futures programme

A small minority of respondents suggested the draft strategy does not adequately acknowledge the financial constraints that institutions are facing, in particular small and non-traditional providers.

Referencing the strategy's proposal to 'consider an enhanced focus on good governance', a few respondents sought clarification as to the criteria the OfS would apply to measure effective management and governance. They stated that it would be difficult to assess the possible implications for institutions without further detail from the OfS.

> The OfS's proposed actions relating to governance are vague. Without more specific detail, it is hard to assess what the implications of this will be for providers. It's difficult to see how greater regulation by the OfS would substantially enhance the sector's governance and there is a danger of increased regulatory burden and overlap with the CUC [Community of University Chairs]. – HE provider, collective response

A few requested details regarding the scope of the OfS's interest in sector governance. Two requested details as to how the OfS will identify 'where management and governance risks are most acute' and queried how the OfS will 'work with institutions to identify and address barriers to strengthened governance'.

Further, a few respondents discussed the topic of value for money. One said the strategy should talk about value for money for students. Another requested detail on how the OfS will ensure value for money in its own plans, referencing the 2023 increase in registration fees. Another requested reassurance that the changes in the proposed strategy (no particular change was specified) would not lead to a reduction in funding, such as the world-leading specialist provider funding, stating that this is vital for providers.

Student interest

A few – including one SU – sought further information about how the OfS will test whether it is serving the student interest effectively.

A few wanted to understand how greater focus on the student interest will manifest in regulatory activity and asked about the changes providers can expect to see. They emphasised the need to ensure that the interests of all student groups are represented and considered when shaping regulatory priorities and how these are pursued.

Respondents said the strategy currently focuses on domestic students, with little consideration given to international students, who form a large proportion of the student body.

A few said a clearer definition of 'student interest' would be beneficial, as the current definition may lead to conflicting expectations and misunderstandings, given the potentially wide-ranging interests it captures. For example, one respondent said the strategy fails to provide a clear view from the OfS about the 'wider' student experience 'beyond making provision to ensure students get what their provider said they would'.

2.5 Strategy duration (2025 to 2030)

Summary of responses on the strategy's extended five-year duration

- **Broad support for the extended period.** The large majority (86%) agreed with the extension to a five-year period. Many said this would provide the sector with stability, particularly in a period of change and uncertainty, and also enable long-term planning.
- **Need to remain agile.** Several emphasised the need for the strategy to remain flexible and responsive to political volatility or other uncertainties and emerging issues. Some also said the strategy should give greater weight to technological advancements, including artificial intelligence, given these rapid changes.
- **Regular reviews.** A third (33%) said the OfS should establish regular review points (every six or 12 months) to monitor progress and to ensure the strategy remains fit for purpose.
- **A minority said five years is too long.** A few respondents said extending the period from three to five years could result in a slower response to emerging issues.

The OfS's previous strategies have covered three years. When asked for their views on the proposal to extend the strategy period to five years, 86 respondents offered comments.

Overall views

The majority (74, 86%) agreed with the extension of the strategy period to five years, most of whom (53, 62%) had additional comments or caveats, and the remaining 21 (24%) expressed support for the extension with no further comment.

A small minority (12, 14%) said that five years is too long.

Further detail and comments are outlined in the sub-sections below.

Sector stability

Around two in five (32, 37%) said an extended strategy period would provide the sector with stability, particularly in a period of change and uncertainty. Respondents agreed that a five-year timeframe is realistic and allows the OfS to be more ambitious and optimistic. Some stated that the five-year period would allow for long-term planning and futureproofing in the sector, by enabling institutions to plan with consistency and stability, while also enabling annual reviews to monitor progress. A few said that stability and continuity would allow institutions to respond more effectively to any challenges they may encounter at a time of change. These points were echoed in feedback sessions with colleges, universities and specialist providers. Indeed, at feedback events some representatives from universities and colleges suggested a longer strategy period of ten years to maximise these benefits, with built-in review points to assess progress and make any necessary adjustments.

> Overall, we agree that a five-year strategy is likely to provide more certainty and stability for the sector and the OfS. It also roughly aligns with the term of Parliament, allowing the OfS's strategy to reflect the priorities

> of an incoming government. The OfS should review its strategy regularly over the period and revise it before five years if that becomes necessary. – HE provider, collective response

Some commended how the five-year period will work well with recurrent exercises such as APPs and the TEF, although a few requested more clarity regarding the alignment of the strategy with APP and TEF timeframes.

One respondent said that five years is a strategic timeframe used by many organisations across the UK. They expected the timeframe to facilitate better results and outcomes by allowing for the consideration of more long-term, quantifiable data.

> A five-year plan is a good idea. Giving universities more time and space to meet your requirements is a good idea. Universities will benefit from longer-term planning rather than shorter-term planning cycles. – HE provider, individual response

Need to be adaptable and agile

One of the main caveats to supporting the decision to extend the strategy from three years to five years, was a need for the OfS to ensure that the strategy remains agile and flexible (31, 36%). This was also emphasised by universities and specialist providers in their feedback session. This, it was argued by some, would help to mitigate risks associated with political volatility and other uncertainties or emerging issues. Respondents did, however, say that a balance was required between responding and adapting to political shifts and retaining consistency and stability.

> A longer strategic period is welcome, however, reactive political influence during the strategic cycle needs to be kept to a minimum to allow consistent institutional direction, during a time of financial instability. – HE provider, collective response

Some discussed the need for the strategy to acknowledge the rapidly evolving landscape of education and employment with regard to AI and machine learning. With such technological advancements, including the rise of AI, respondents suggested that the OfS's strategy needed to be sufficiently agile to keep up with these developments.

Timely reviews by the OfS

One in three (28, 33%) suggested the need for regular review points. To ensure the strategy remains appropriate and fit for purpose up to 2030 as the HE sector evolves, respondents suggested interim checks are required to ensure that the strategy can respond effectively to internal and external factors. Some discussed annual business plans, putting these forward as an effective way to monitor progress, resources, and emerging issues, and set out the OfS's response. Some others suggested separate yearly or six-monthly reviews.

A few discussed the idea of a published, annual review to share updates, progress and issues with the sector. A few said that key performance indicators would help inform reviews of the strategy in a timely and efficient manner.

> We support the proposal to extend the strategy period to five years. This approach will help the OfS be an effective, agile regulator, thereby providing greater clarity and stability for both students and the wider sector. However, for this to be effective, it is essential that the strategy remains responsive to emerging student needs and priorities: there must be a balance between long-term stability and adaptability. To achieve this,

> we believe the OfS should commit to regular student engagement and consultation that extends to, and beyond, the student interest committee. This will ensure that student voices are actively shaping the direction of the higher education sector. – Student or students' union

Suggested timeframe too long

Some (12, 14%) said the five-year strategy period is too long on the basis it could result in a slower institutional response to emerging issues. A few preferred a three-year strategy period as they stated that a five-year strategy may not enable sufficient agility to respond to sector volatility.

2.6 Views on the 'I statements'

The 'I statements' describe what delivery of the OfS's strategic objectives will look and feel like for students, institutions, taxpayers, and employers in a clear and accessible way. They do not track individual goals, and are not intended to be used as a measure of sector performance, but instead are intended to articulate the overall impact of the strategy from the perspective of key stakeholders. This should be kept in mind when reading the following analysis.

The 'I statements' are primarily focused on students, though there are also statements from the perspective of institutions, taxpayers, and employers.

For context, the 'I statements' in full are provided in appendix 3 of this report.

Summary of responses on the 'I statements'

- **Mixed views.** Many said the statements are appropriate and clearly describe the impact of the OfS's strategic objectives, but some described them as being of limited use or value.
- **Misunderstanding around the intended use of the statements.** Several (30%) said the statements will be difficult to measure and queried how the OfS will use them in practice. Some also pointed out that the compound nature of some statements may problematically conflate issues, further complicating measurement. The intended use of the statements, however, is not to measure, but to articulate the OfS's strategic objectives in a more accessible format, particularly for students.
- **Wording amendments.** While, overall, respondents approved of the statements, a third (32%) said refinements were needed, including more clearly defined language. Several suggested amendments or additions to the institution statements to account for the OfS's performance in its role as regulator.
- **Student responsibility.** Several respondents requested acknowledgement of students' responsibility to engage with their education, and some suggested inclusion of reference to careers and readiness for work.

- **Institution and sector diversity.** Some requested that the statements be adapted to different provider types or sizes, rather than taking a 'one-size-fits-all' approach. There were also suggestions for statements from the perspective of other stakeholder groups including small or specialist institutions, apprentices, non-taxpayers, whistleblowers, charities, and other bodies (such as the OIA).

2.6.1 Overarching views on the statements

When asked for thoughts on whether the proposed 'I statements' appropriately and clearly describe the impact that delivery of the OfS's strategic objectives should have on key stakeholders, 88 respondents offered comments.

Approximately two fifths (37, 42%) agreed that they did, with five describing the statements as user-friendly and easily accessible, particularly for students.

Just over a quarter (23, 26%) disagreed and said the statements are of little use, or do not add value to the strategy. A few said the 'I statements' are unrealistic in terms of what the sector can achieve.

Remaining respondents (28, 32%) were neither supportive nor critical and instead offered more general comments or suggestions for the OfS to consider.

Purpose of 'I statements'

Many respondents (26, 30%) said that the statements will be difficult to measure, reflecting the assumption that 'I statements' would be used to measure sector performance. They requested further detail on how the OfS intends to use the 'I statements'. A few explicitly queried whether the statements would be treated as measures of success (and therefore key performance indicators - KPIs) for providers, with concern that this would increase regulatory burden with little benefit for students or providers. A few also requested further information about how the OfS intends to measure the extent to which the 'I statements' have been realised.

> We would like more clarity on how the 'I statements' will be used as indicators of success. For example, does the OfS intend to undertake periodic interviews with students, institutions, taxpayers and employers? – HE sector body

A further 20 (23%) said that the proposed statements are subjective, and therefore beyond the scope of what providers can reasonably influence. Respondents asked the OfS to provide further guidance where wording is open to interpretation. Similar concerns regarding the subjectivity of the statements were shared in the universities and specialist providers' feedback session.

Some highlighted that several of the 'I statements' overlap with questions asked by the National Student Survey (NSS). While not a major point of concern, clarity was sought as to how the two will function together, with respondents pointing out that the statements could duplicate the work of the NSS. A few said that agreement with the statements is likely to be influenced by external factors beyond providers' control.

> It is important to acknowledge that there may be challenges to fulfilling these statements which are beyond the direct control of universities. For example, there may be student engagement barriers which exist due to

> financial limitations, which the university can often offer support to address, but may not be capable of eliminating. – HE sector body

A few raised concern that the majority of the 'I statements' capture institutional outcomes, with any positive results being attributable to the work of individual universities and colleges (rather than the OfS). This point was echoed by participants during the universities and specialist providers feedback session.

A few suggested that stakeholders, including employers, should be further consulted on the statements.

Amendments to wording of 'I statements' – overview

Many (28, 32%) recommended amends to proposed 'I statements'. Most commonly, respondents said that the statements are too vague or ambiguous and requested that the OfS define key terminology (for example: 'positions of power' and 'hope'). Some recommended specific changes to the wording, including:

- using the term 'learning environment' instead of 'classroom',
- using 'exceptional' instead of 'decent' to describe study spaces, and
- adding 'within a reasonable distance from my home' to the statement on student choice of courses.

Some commented on the nature or content of the 'I statements'. This included ten respondents who said the statements do not sufficiently reflect the diversity of the sector nor its students and therefore fail to represent the diversity of the student interest. Respondents asked that the OfS considers the perspective of particular student groups, including students on non-traditional career paths, mature students, students with caring responsibilities, and those from a disadvantaged or underrepresented background. This point was also raised in the colleges feedback session, where participants said the statements should support inclusivity by referencing similar student groups.

A further point of concern for some was the compound nature of the statements, in that some refer to two different points or issues within one statement. It was pointed out that this could be problematic in cases where stakeholders agree with one part of the statement but not the other. Respondents asked that such statements be simplified or separated out into two individual statements. Again, this may be reflective of respondents' assumption that statements will operate as a performance measure.

A couple said that there are currently too many 'I statements' and that a reduced set of statements would be more useful and easier for stakeholders to engage with.

In both the college and university and specialist provider feedback sessions, participants suggested the 'I statements' be sequenced to reflect the student journey from decision making to post-graduation outcomes.

Detailed comments on statement wording are contained in section 2.6.2.

2.6.2 Detailed views on the statements and suggested alternatives

When asked whether the strategic objectives distilled in the proposed 'I statements' are the right ones, or whether any additional 'I statements' are proposed, 84 respondents offered comments.

Around a quarter of respondents (19, 23%) agreed, or agreed in principle, with the question, with some suggesting the objectives are appropriate, but that the statements themselves needed refining or adding to.

A few disagreed with the use of the statements, describing them as unhelpful and potentially confusing for stakeholders.

The majority (60, 71%) offered more general thoughts or constructive suggestions around the 'I statements'.

The following section discusses the statements relating to each stakeholder group in turn.

Student statements

Some respondents would welcome acknowledgement of students' responsibility to engage with their education, reflecting that while providers are responsible for offering a suitable learning environment and delivering high quality teaching, it is ultimately the responsibility of the student to make use of this. This was also mentioned in the university and specialist provider feedback session.

Some respondents, including students' union representatives, praised the OfS's efforts in the strategy to inform students of their rights and support their enforcement.

> The statement ''I understand my rights as a student and I know what to do if I feel I am not getting what I was promised from my institution' is valuable and the Union strongly believes in empowering students with information. – Student or students' union

Concern was raised about the use of terms such as 'promised' and 'hopes and expectations' that refer to subjective concepts. Respondents said that this makes it difficult to quantify exactly what a provider has 'promised' and suggested that students' 'hopes and expectations' are unique to the individual and may also be unrealistic. Colleges, universities, and specialist providers shared similar concerns in their feedback sessions. They called for clearer language and described the terms 'high quality' and 'needs outside the classroom' as ambiguous.

Some said that student statements should include reference to future careers and readiness for work, arguing that employability and career goals are important to students. A few would like the statements to better account for the diversity of the student experience.

> The 'I statements' should also reflect the diverse journeys learners take into, and through, HE. For example, there is no recognition of apprenticeships, students who go on to be entrepreneurs (instead of employees) or learners who are already in work. – HE sector body

> The value for money statements don't easily translate to apprenticeships where it is the employer paying for them. – Student or students' union

A few respondents asked for the student statement which refers to harassment and sexual misconduct to be broadened to cover student safety more generally and reflect students' confidence that their institution will protect them. A further six requested greater focus on students' mental health and wellbeing, suggesting new statements that reflect the importance of adequate mental health support.

A few others suggested new statements to reflect:

- students' confidence that their HE experiences offer good value for money,
- students' awareness and understanding of the OfS,
- students' confidence in their providers' commitment to environmental sustainability practices.

Statements reflecting the broader societal impact of HE in relation to citizenship and community were also proposed by colleges and universities and specialist providers in feedback sessions.

Institution statements

Around a quarter (19, 23%) said that statements from the perspective of institutions need to be amended or augmented to reflect the regulatory performance of the OfS more directly. Respondents said that if the OfS is successful in achieving its strategic objectives, then providers should agree with additional statements such as 'I am able to identify the reduction in burden from the OfS', 'I consider the regulatory burden to be fit for purpose for the scale and remit of my HE provider', or 'I value the role and work of the HE regulator for England'. Additional statements reflecting providers' confidence in the OfS's understanding of the sector, as well as their confidence in its performance as a regulator, were also suggested by a few respondents.

Additionally, some would like to see the importance of engagement between providers and the OfS reflected more fully in 'I statements'. One suggested the current statement ('I can engage constructively and transparently with the OfS…') should be extended to include the reciprocal nature of the relationship ('…and I am confident the OfS will engage with me'). Another respondent questioned how realistic the 'I statement' 'I am confident I won't be taken by surprise' might be in light of the recent decision to temporarily suspend registration and other functions.

Respondents said that the diversity of the sector should be reflected in 'I statements.' They urged the OfS to acknowledge that a one-size-fits-all approach to the statements may be inappropriate and asked for consideration of different statements for different types and sizes of provider. A few suggested that different modes of delivery – such as online provision – should also be reflected in 'I statements', and recommended that 'I statements' recognise the role that placement providers play in securing positive experiences for healthcare students.

> External placements are necessary to deliver many healthcare courses, such as nursing, and require partnerships beyond the universities which means responsibility for a big part of the student experience sits with placement providers such as the NHS. – HE sector body

A similar number asked that statements better reflect the financial environment which providers face, with room for flexibility should future challenges arise.

Taxpayer statements

Some discussed the statement 'I am proud of England's higher education sector', saying that as pride is subjective and difficult to measure it is an inappropriate concept to incorporate into the statements. It was suggested this statement ought to be removed, particularly given

that a relatively small proportion of the population interacts with the HE sector to the extent that they would be in a position to meaningfully comment.

A few said the taxpayer statements should take a more holistic approach and look at the broader benefits of HE to society, rather than taking a transactional approach and focusing solely on value for money. Respondents recommended adding another statement, with one suggesting *'I know that my investment in higher education supports the development of enterprising graduates who drive innovation, create jobs, and contribute to a thriving economy and society'.*

One said that taxpayers' perceptions of whether public money is being put to good use will be influenced by the clarity of communication from the OfS.

Employer statement

While believing the proposed statement is broadly appropriate, some proposed emphasising the readiness for work element more strongly. Individual suggestions include:

- a greater focus on graduates having appropriate skills for their career,
- reference to a 'future-focused workforce',
- further acknowledgement that graduates bring valuable knowledge and experiences to the workplace, and
- reference to the transferability of graduates' skills.

A few would like to see additional statements from the perspective of employers which reflect the role they play in the delivery of practical HE courses.

> The proposed statement does not acknowledge the crucial role that employers play throughout the education and training process. Many healthcare students undertake significant practice-based learning in varying settings, where clinical placements, mentorship, and employer engagement are essential to their development. – Professional, statutory and regulatory body

A few respondents proposed an additional 'I statement' reflecting the broader value of HE and the importance of employers' engagement with providers.

Statements for other stakeholders

A few would like to see additional statements from the perspective of other stakeholder groups, including smaller or specialist institutions, apprentices, non-taxpayers, whistleblowers, charities, and other bodies (such as OIA).

In addition to statements about the OfS's relationship with institutions and students, a few suggested 'I statements' it would expect the OfS to agree with if it were achieving its strategic objectives. This included 'I understand and regulate in accordance with the concerns and priorities of students and the sector' or 'I understand the context I am working in, and this understanding is reflected in the way I regulate and prioritise'.

Other suggestions

Additional comments and suggestions were received from a small number of respondents:

- an additional statement related to financial sustainability,
- an additional statement related to freedom of speech,
- the need to consider the long-term student interest,
- an additional statement related to enhancement activity, and
- a query about whether the OfS intends to apply a theory of change to the strategy.

3. Conclusions

This report has provided an overview of responses received in response to the OfS's consultation on its proposed strategy for 2025 to 2030.[6]

Based on the analysis of all 97 unique responses received to the consultation, and the feedback events, this chapter does not seek to cover the detail of all points raised in the consultation but draws together the themes and considerations most commonly raised by respondents across the consultation questions and events, acknowledging instances where there is a range of views on certain topics.

General levels of support

Broadly, the strategy is welcomed and its student-centric approach in particular is commended. Many stakeholders have taken the time to provide constructive comments and are eager to work collaboratively with the OfS. In particular, there is strong support for the proposed extension of the strategy's duration to five years to provide the sector with stability and consistency.

In addition, there is general support for the three core focus areas of the strategy: quality, the wider student interest, and sector resilience. The overarching theme of equality of opportunity was also praised by many.

Concern around increased burden and resource requirements

There is concern among some that strategy proposals may require providers to allocate additional time and resource to regulatory compliance, potentially at the expense of ensuring a high quality student experience. This risk was said to be particularly pronounced for small and specialist providers with more limited resource, at a time when they are already facing financial constraints.

In particular, respondents raised concern about data collection activities, and emphasised the need for these to be proportionate and feasible, and to avoid duplicating existing processes. Respondents said that implementing lessons learned from Data Futures, and other data collection exercises, would help ensure an efficient and streamlined process.

Additional clarity would be welcome

Respondents requested further detail on various aspects of the strategy and how the strategy would be put into operation.

This discussion centred on quality assessment and the QRR, with stakeholders seeking further information about how these would work. Respondents queried the added value of the Register and stressed the need for the OfS to work closely with the sector to ensure it aligns with (and does not duplicate) existing processes.

In addition, while there are mixed views on the 'I statements' (with a modest leaning towards support), respondents said the wording could be improved in some instances. Moreover, respondents sought clarity on how the statements would be used. Many assumed that the

[6] It should be reiterated at this point that, by its nature, this consultation is self-selecting in its response and cannot be said to be representative of the sector.

statements would be used as performance indicators which providers would be measured against.

Reflecting sector diversity

Across the consultation responses and feedback events, there is a view that the strategy could better reflect the sector's diversity. This is not only in terms of the wide range of students engaging with HE, but also the variety of provider types, and the range of students' experiences. As such, it was stated that a one-size-fits-all approach would be unsuitable once the OfS begins to implement the strategy at a more granular level. Though respondents acknowledged that the strategy cannot be tailored to individual institutions, many sought reassurance that the strategy's expectations are flexible.

Collaboration

Many commended the collaborative tone of the proposed strategy and emphasised the importance of collaboration not only between the OfS and providers and the sector generally, but also between the OfS and other sectors outside of education, such as the health sector via the NHS. Several respondents raised the non-academic support that students need and requested that the OfS supports in encouraging collaboration between providers and health services to ensure that students have access to appropriate support. Students and SUs also requested acknowledgement of the importance of collaboration between the OfS and SUs.

Appendix 1: Respondent profile

This section outlines a more detailed profile of those responding to the consultation.

Respondents were presented with several categories and asked to select which best described themselves. Some chose a pre-selected category, while others typed in a freeform response that did not align to a pre-defined category.

Respondents were therefore manually reviewed and grouped by Pye Tait Consulting in agreement with the OfS into one of six categories that were determined jointly following the consultation's conclusion. Grouping respondents into a small number of categories means that each category has a higher number of responses, making subsequent sub-group analysis more meaningful, particularly in instances where categories listed in the original consultation question received a very low number of respondents.

Respondent type

All respondents, including those submitting responses offline, were grouped – in agreement between Pye Tait Consulting and the OfS – and are reported according to the following categories.

Table: Respondent type

Respondent type	Count	Per cent
Higher education provider - collective response	55	57%
Higher education sector body	17	18%
Student or students' union	9	9%
Professional, statutory and regulatory bodies	8	8%
Higher education provider - individual response	5	5%
Other	3	3%

Base: 97 respondents. Source: OfS consultation 2025.

Appendix 2: Consultation questions

The full OfS consultation questions and wording are listed below.

The full consultation guidance, including supplementary wording and context provided for respondents, is available here:

https://www.officeforstudents.org.uk/publications/consultation-on-ofs-strategy-for-2025-to-2030/

List of consultation questions

Question 1: Do you have any comments to make on the OfS's proposed strategy for 2025 to 2030 or the priorities set out within it?

Question 2: Do you have any comments about any unintended consequences of the proposed strategy or the priorities set out within it, for example for particular types of providers, particular groups of students, or for individuals on the basis of their protected characteristics?

Question 3: Are there aspects of the proposals you found unclear? If so, please specify which, and tell us why.

Question 4: Our previous strategies have covered periods of three years. For this strategy, we are proposing an extended strategy period of five years. Do you have comments on this proposal?

Question 5a: Do you think that our proposed 'I statements' appropriately and clearly describe the impact that delivery of our strategic objectives should have on our key stakeholders?

Question 5b: Do you think that the strategic objectives distilled in our proposed 'I statements' are the right ones? Do you propose any additional 'I statements'?

Appendix 3: 'I statements' in full

The full 'I statements' and wording are listed below.

The full consultation guidance, including supplementary wording and context provided for respondents, is available here:

https://www.officeforstudents.org.uk/publications/consultation-on-ofs-strategy-for-2025-to-2030/

The OfS states that these 'I statements' are a vehicle for communicating the future it wants to bring about. They are intended to describe what achieving its strategic objectives will look and feel like for students, institutions, taxpayers and employers in a clear and accessible way. They do not track individual goals but instead describe the aggregate impact of the OfS's strategy from the perspective of its key stakeholders.

'I statements' are weighted towards students, as the primary beneficiaries of the OfS's proposed strategy.

If the OfS achieves its strategic objectives, it would expect **students** to agree with the below statements.

- My course is well organised and delivered, enabling me to acquire knowledge and develop skills relevant to my subject area.
- I benefit from high quality resources and decent study spaces, and can access the equipment I need to participate fully in my course.
- I get timely, constructive feedback and the academic support I need to improve.
- I am fairly and effectively assessed, and confident that prospective employers will recognise the value of the qualification that I achieve.
- I have access to the information and support I need to make an informed decision about which route into higher education is right for me.
- I can choose from a range of high quality courses that suit my needs.
- I understand my rights as a student and I know what to do if I feel I am not getting what I was promised from my institution.
- I am treated fairly by my institution and my views are listened to and acted on appropriately by those in positions of power.
- I'm getting what I was promised when I signed up for my course – my hopes and expectations when I chose it are being met.
- If I see or experience harassment or sexual misconduct at my institution, I know what to do and am confident my institution will respond compassionately and effectively to protect students.
- My institution recognises my needs outside of the classroom and takes reasonable steps to ensure I benefit from higher education in the round.

If the OfS achieves its strategic objectives, it would expect **institutions** to agree with the below statements.

- I can engage constructively and transparently with the OfS and am confident I won't be taken by surprise.
- I am confident my institution would be treated fairly should it encounter challenges.
- I understand the OfS's regulatory priorities and requirements and am confident its regulatory approach is driven by the interests of students and informed by the expertise in the higher education sector.

If the OfS achieves its strategic objectives, it would expect **taxpayers** to agree with the below statements.

- I am confident that public money is being put to good use in higher education.
- I am proud of England's higher education sector.

If the OfS achieves its strategic objectives, it would expect **employers** to agree with the below statement.

- I know that when I employ a graduate I am gaining a highly qualified employee who is well prepared for the world of work.

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