

Quality risk factors

1. This document lists the quality risk factors that the OfS uses to assess possible risks to the quality of courses at registered providers. We are publishing these risk factors to explain what information we may use to assess risks to quality and to help providers monitor their own quality.

Purpose of the quality risk factors

2. We use the quality risk factors to identify providers that may have quality problems, assess those risks and decide whether we need to undertake a quality assessment.
3. We described the risk factors originally as ‘the risk monitoring tool’ in the September 2025 consultation on our future approach to regulating quality. We revised the factors based on feedback from that consultation.
4. We will keep the risk factors under review and may amend them over time to reflect changes in the sector, emerging risks or changes to available evidence. We will also update this document with further detail following our consultation on the future quality system.¹

How we use the factors to assess risk

5. We will use several sources of information to assess risk. We would not normally decide that there is a risk to quality based on one factor or a single piece of data. Instead, we will consider the risk factors together with other information we have about a provider.
6. But, in some cases, one source of information may raise serious enough concerns for us to assess the risk as higher. For example, this could be information provided by a third party.
7. We use the risk factors to identify emerging risks at an early stage. Wherever possible, we will use the most current information available to us, including data sources that provide early indications of potential risks.
8. We do not apply predetermined thresholds to individual risk factors. When assessing risk, we will:
 - a. Consider whether an individual factor suggests a provider is an outlier in relation to sector norms.
 - b. Consider how different risk factors interact and whether, taken together, they indicate potential risks to quality.
9. We will not use risk factors on their own to decide whether a provider meets our quality requirements. A risk assessment will not determine the outcome of any later quality assessment or investigation.
10. We will use risk assessments to:

¹ For details of the consultations, see [Reforms to quality regulation](#).

- identify providers where further engagement or information gathering may be appropriate
 - identify providers where an investigation may be appropriate
 - support an assessment of eligibility and suitability for degree awarding powers.
11. We may group risks into categories so that we assess them consistently and decide which to address first. These categories help us decide how closely to examine a provider, but they do not show whether the provider meets our regulatory requirements.
 12. We will regularly review information about these factors. We will do this when new data becomes available, when we select providers for quality assessments each year, and when we receive notifications or other regulatory information that may suggest concerns about quality.
 13. We do not intend to publish provider-level data in relation to the risk factors or our assessment of individual providers' risk profiles. Where our risk monitoring identifies potential concerns, we would normally engage directly with the provider concerned to understand the issues. However, the nature and timing of any engagement will depend on the circumstances and seriousness of the concerns we identify. Where serious concerns arise we may move straight to an investigation in order to protect students.

Risk factors

14. The table below sets out the risk factors that the OfS will consider in our ongoing monitoring of quality.

Risk factor	Rationale	Evidence we would use
Very high or significantly increasing student:staff ratios	We consider that student:staff ratios that are materially or rapidly increasing or are outliers at the high end may present a risk to quality.	Data derived from student and staff returns:
Very high or significantly increasing use of atypical academic staff	The financial viability and sustainability enquiry project found that financial pressures are leading some providers to reduce staffing, or rely increasingly on temporary staff or non-academic staff to deliver programmes (reported as 'atypical' academic staff in the HESA staff return). It also indicated potential negative impacts of this on quality.	• Student:staff ratios that are outliers at the high end of the sector. • Material or rapid increases in student:staff ratios over time. • Proportion of academic staff on atypical contracts that is increasing over time or an outlier at the high end of the sector.

Risk factor	Rationale	Evidence we would use
Rapid or significant changes in overall student numbers, or in student numbers in one area of provision (for example a mode or level of study, or subject area).	Evidence from student outcomes data and other quality investigations that providers do not always successfully manage rapid increases in student numbers, for example by not ensuring equivalent increases in academic staffing, student support, learning resources or by appropriately balancing resources across the full range of provision. This risk is likely to be more significant when combined with other risk factors such as growing partnership provision or recruiting more students onto foundation years or with low entry qualifications, as these students are more likely to have additional support needs. Conversely, a rapid or significant decline in student numbers (either across a provider as a whole or in an area of provision) may result in resources being reduced or diverted away from remaining students with a potential risk to quality.	Changes in student numbers based on Student Loans Company data, and forecast student numbers in annual financial returns. OfS size and shape data for mode and level of study.
Recruitment of a very high proportion of students with very low or no entry qualifications	Student outcomes data shows that across the sector continuation rates for full-time, first-degree students with certain types of entry qualifications have fallen below the minimum threshold. Evidence from student outcomes data and quality investigations that providers recruiting students with low entry qualifications do not always successfully provide for the additional or differing support needs that arise. This risk is likely to be more significant when combined with other risk factors such as significant growth in student numbers, or a change in a provider's recruitment model that significantly increases the proportion of entrants with very low or no entry qualifications.	OfS size and shape data. UCAS data (noting that some students with no or low entry qualifications may be recruited outside of UCAS).

Risk factor	Rationale	Evidence we would use
Large or growing volume of foundation year provision	Student outcomes data shows that across the sector as a whole continuation rates for full-time, first-degree students studying with a foundation year have fallen below the minimum threshold. Evidence from student outcome investigations that some providers have sought to increase student numbers by substantially increasing the number of students it recruits via foundation years, and that providers have not always managed the different needs of growing numbers of foundation year students.	OfS size and shape data. Student outcomes data.
Large or growing portfolio of delivery through domestic partnerships	Student outcomes data shows that across the sector continuation rates for full-time, first-degree students delivered via a subcontractual partner have fallen below the minimum threshold.	OfS size and shape data. Student outcomes data. Reportable events indicating new partnerships or termination of partnerships. Reportable events relating to the oversight of subcontractual arrangements that may indicate quality risks at delivery providers.
Low continuation rates, or a rapidly declining trend in continuation.	Evidence from quality investigations that continuation rates below the minimum thresholds can indicate issues with the quality of the student academic experience. Continuation is a more timely indicator than other outcome measures. An emerging trend of rapidly declining continuation rates, even where they remain above the minimum thresholds, could also signify potential risks to quality.	Student outcomes data. Student Loans Company term 1 data.

Risk factor	Rationale	Evidence we would use
Unusually high or low NSS scores, or rapid changes in NSS scores.	The student voice can provide insight into potential risks to quality before the impact of issues feeds through to other data sets. Excessively low NSS scores, taking into account benchmarking factors, or a rapid decline in scores would potentially indicate risks to quality. Conversely, unusually high NSS scores that are outliers in the sector, when considered alongside other data, could potentially indicate risks to quality. For example, unusually high NSS scores alongside poor post-study outcomes could indicate that courses may not be sufficiently challenging.	NSS data.
Notifications, reportable events and other regulatory intelligence indicating concerns *	Where they appear to be credible, notifications can indicate concerns about quality. Information from other regulators or agencies can relate to concerns about the quality of a provider's higher education courses. Reportable events submitted by providers can relate to concerns about quality, or to the factors included here that inform the OfS's view of risk. Regulatory intelligence would also include where we have evidence of financial concerns at a provider with the potential to impact on the quality of course delivery.	Notifications sent to OfS indicating quality issues. Relevant regulatory intelligence shared by professional, statutory and regulatory bodies, other regulators, the Student Loans Company or other agencies. Reportable events relevant to quality (including quality risk factors). Regulatory intelligence arising from financial returns or engagement with providers.

*Notifications and reportable events, by their nature, cover a wide range of events and concerns that may arise at a provider and not all of these will be relevant to our view of risks to quality. We expect to focus our attention on those which we consider are most likely to have an impact on the quality of delivery of courses to a provider's students. We have provided some indicative examples below to illustrate our expectations. However, in practice we will consider the regulatory intelligence that we hold on each provider on its own merits and may therefore engage with a provider about other circumstances not covered here.

Examples of relevant notifications, reportable events and regulatory intelligence:

- Information from external organisations and agencies about a provider's courses, such as reports from professional, statutory and regulatory bodies, other professional or accreditation bodies or other funding or regulatory agencies.

- Notifications from a provider's staff or students raising concerns about the quality of teaching or assessment; information about student complaints.
- Reportable events indicating disruption to course delivery, such as course closures or industrial action.
- Reportable events relating to oversight of delivery partners, such as adverse audit findings or investigative activity between the providers in a partnership.
- Reportable events or other regulatory intelligence suggesting a substantial change to a provider's ability to appropriately resource the delivery of courses.