Lessons learned from the University of Sussex judicial review

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Foreword

by the OfS Chair and Chief Executives





The judgment in the judicial review between the Office for Students (OfS) and the University of Sussex made for challenging reading. It found in favour of the university on several grounds, pointing out flaws in the approach that had led us to impose a fine for breach of our conditions of registration.

We made mistakes in the University of Sussex case, and we regret this. We did not therefore appeal the judgment; instead, we promised to consider its findings with honesty and humility, so that they could inform our future approach to regulation. We were already making changes in response to the lessons from the House of Lords and Behan Reviews, seen in our new strategy, but the judgment prompted further reflection and change.

To this end, we commissioned an internal review by the consultancy firm KPMG, whose findings are summarised in an annex to this report, and agreed areas for improvement with the OfS Board. We have drawn on other sources, including our new stakeholder survey, and conversations about our approach to regulation with colleagues across the higher education sector.

Any perception of prejudging decisions, and any loss of trust, are damaging for a regulator, and we are striving to ensure that our processes in future are transparent as well as fair.

So far, we have focused on updating and clarifying our guidance. We have also adopted a new strategy and a new ‘no surprises’ approach to regulatory engagement. We hope that universities and colleges are already seeing a more collaborative way of working on our part.

We intend to do more to improve, not simply because of the judgment but because we want the OfS to be an exemplary regulator. We have therefore commissioned a comprehensive review of our structures and processes, comparing the way we work with other regulators, and are working to build trust through better communication and engagement while improving our own internal culture.

We are publishing this report because we want to be open and transparent. We have learned these lessons through hindsight, but they will be applied in the future, and we hope that our response to the judgment will be seen as a turning point.

Our thanks go to everyone involved, including our Board and across the sector, and in particular to the leadership of the University of Sussex, for the frank discussions and insightful commentary leading to this point. Our thanks also go to OfS staff, who have approached our review of this work with openness, a willingness to learn and an unwavering focus on students.

We invite staff and students in higher education to support us as we change, and to continue to hold us to account. With your help we can ensure that our regulation continues to support the high standards of the large majority of our higher education institutions, openly, honestly and equitably, for the benefit of students, employers and the public, while also tackling instances of poor provision

Edward Peck
Chair

Ruth Hannant and Polly Payne
Chief Executives

Lessons learned

In our overall approach to our future regulation, there should be **no surprises** for higher education providers. This means we engage early, communicate openly and use enforcement only where we consider necessary.

To enable this:

1. We will ensure **respectful relationships** with higher education providers.
2. We will improve our **communications and transparency** relating to the investigation and enforcement process.
3. We will, where possible, use **alternative forms of intervention** to effect change before taking enforcement action.
4. We will strengthen our **structure and processes**, including to guard more effectively against the risk of predetermination and decision momentum.
5. We will review our **OfS culture** to encourage challenge and agility.

Overall approach

No surprises

Action 1: Normalising our no surprises approach

1 Lesson 1
Respectful relationships

Action 2: More collaborative working

Action 3: Regular dialogue and meetings

2 Lesson 2
Communications and transparency

Action 4: Meetings during investigations

Action 5: More transparent investigations

Action 6: Revised Regulatory framework

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4 Lesson 4
Structure and processes

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Action 9: New team structure

Action 10: New internal oversight arrangements

5 Lesson 5
OfS culture

Action 11: Embedding the OfS attitudes

Action 12: Cultural change programme

Action 13: Evaluation of behavioural impact

Background

1. Between October 2021 and March 2025, the OfS carried out an investigation of the University of Sussex. In March 2025, we found the university in breach of our requirements relating to freedom of speech and management and governance, and imposed a £585,000 monetary penalty.

The judgment

2. In May 2025, the university filed a claim for a judicial review of this decision. In April 2026, the High Court ruled against us on most grounds.[1]

3. The court rejected several specific arguments made by the university, including that we did not have the jurisdiction we had claimed. However, it found that in this case the OfS had:

   - adopted an overly broad interpretation of what was meant by 'governing documents'
   - incorrectly applied the legal test relating to freedom of speech
   - failed to give sufficient weight to relevant evidence
   - failed to sufficiently consider the university's current position in terms of compliance with the conditions of registration
   - approached the investigation with a closed mind.

4. This report explains our response to the judgment. It does not focus on the legal questions relating to academic freedom and governing documents that were at issue in the case itself, which we have addressed as detailed in paragraphs 6 and 7. Rather it relates to the OfS's overall approach to investigation and enforcement, and the culture, structure and processes that underpinned it. Thus, while it is prompted by the judgment, it inevitably goes further, drawing on wider input and consideration of how we want to improve as a regulator in line with our strategy.

5. The reflections in the report are nevertheless relevant to how we navigate legal questions now and in the future, and indeed to the work of everyone in the OfS. In applying these reflections, we are and will continue to be mindful of learning the wrong lessons and creating a climate of risk aversion.

Our response to date

6. We have accepted the judgment of the High Court and acknowledge that we made mistakes in the case of the University of Sussex. We have already updated our guidance relating to freedom of speech, to reflect the court's judgment on the legal test. This included amending the framework that helps institutions assess whether restrictions on lawful speech are

[1] See Judiciary.UK, The University of Sussex -v- The Office for Students.

justified, adding some explicit clarifications and making some changes to the practical examples.[2]

7. We have also changed our definition of 'governing documents', to mean 'documents that have some governing effect, which goes to the constitution or governance of the higher education provider'.[3]

8. As part of our freedom of speech work, we have met with many vice-chancellors and other senior staff at institutions to discuss these issues, including the clarifications we have made to our guidance. We have also discussed our lessons learned with the University of Sussex. We are grateful to the university for its response and are acutely aware of the impact of this case on the university. We now look forward to working with it constructively in the future.

9. Our response to the judgment is an important part of our wider work to improve and enhance the OfS's regulation of the higher education sector in England. Many of the actions we have taken and will take go beyond simply addressing the judgment and aim towards our aspiration for the OfS to be an exemplary regulator.

KPMG review

10. In June, as part of our response to the judgment, we commissioned the consultancy firm KPMG to undertake an internal review of the processes in the OfS that led to the decision to fine the university. This was a targeted 'lessons learned' review, focusing on our organisational culture and decision making, and the scope for challenging decisions internally.

11. KPMG gathered evidence for the review through interviews with staff involved in the case who were still employed by the OfS, and a facilitated workshop with them and staff employed since who have experience from other regulators. It considered its findings alongside the judgment and the OfS's response to it, identifying the lessons that should be learned and the areas where we should strengthen our future investigations to ensure that they are more robust.

12. KPMG grouped its findings under four key themes: governance, regulatory decision making, decision momentum and bias risk, and ways of working. The findings of the review are summarised in Annex A, while further detail of the methodology is available in Annex B.

Other input

13. As well as reflecting on the findings of the judgment and the conclusions of the KPMG review, we have considered the public responses from the higher education sector. We have also taken into account our many discussions with bodies representing students and the sector, as well as higher education providers, which often include suggestions for improving the work of the OfS.

[2] See OfS, 'Regulatory advice 24: Guidance related to freedom of speech'.

[3] See OfS, 'Description of governing documents'.

14. We have taken into account other sources of commentary as well, such as the House of Lords Industry and Regulators Committee report on the OfS and mission group responses to that inquiry, the Behan review of the OfS, our stakeholder surveys, and perspectives from and surveys of OfS staff. This includes reflections on how we run investigations, including for example in Universities UK's published response to the House of Lords committee report.[4]

15. As part of holding ourselves accountable for the effectiveness of our actions in response to the judgment, we will continue to report publicly on our strengthened key performance measures – most relevantly KPM 4 – and on our stakeholder survey.[5] We will continue to seek feedback from the sector about our investigations and compliance activity, our overall performance and how we are perceived.

[4] See Universities UK, 'Evidence to the House of Lords inquiry on the work of the Office for Students'.

[5] See OfS, 'Key performance measures', especially Key Performance Measure 4: The proportion of accountable officers reporting trust and confidence in OfS communications; Savanta, 'Office for Students stakeholder survey report', published by the OfS.

Overall approach: No surprises

In our overall approach to our future regulation, there should be **no surprises** for higher education providers. This means we engage early, communicate openly and use enforcement only where we consider necessary.

16. We are working to develop and put into practice a new 'no surprises' approach to regulation and will hold ourselves accountable for its successful implementation. We are embedding this approach in our internal processes, so that it will guide our interactions with institutions and the higher education sector, and their expectations of us.

17. What this means is that:

    a. The institutions we regulate should understand how we assess risk, the primary sector-wide priorities that inform our focus, and the factors that may lead to regulatory intervention.

    b. When concerns arise, we generally engage openly and at an early stage, sharing emerging views, risk indicators and relevant information so that institutions have a meaningful opportunity to respond and improve.

    c. Formal regulatory correspondence or decisions do not come as a surprise to institutions, except in cases where there is a clear and justified reason.

    d. Enforcement action is used only where we consider it necessary. Typically this will occur in response to significant or escalating concerns, or where concerns have not been addressed through earlier engagement.

18. This approach will mean that institutions will normally have clear communication about and understanding of our concerns at an early stage, and opportunities to address them before we begin any formal investigation or compliance action. This will help prevent the concerns expressed in the University of Sussex judgment from arising again.

19. This approach will not prevent us from taking robust and swift action to protect students and taxpayers where this is warranted.

20. We are already improving the transparency of our decision making processes, for instance by publishing our financial viability and risk assessment framework, and sharing emerging sector-level governance risks publicly.[6]

Action 1: Normalising our no surprises approach

21. We will explain and publicise our no surprises approach so that it is generally known across the higher education sector, while making it clear that we will still act robustly to use formal enforcement where we consider it necessary. We will be discussing this approach and

[6] See OfS, 'Financial viability and sustainability risk assessment framework' and 'Emerging governance risks'.

seeking feedback regularly through our engagement with institutions and their representative bodies across the sector.

22. We will embed this concept across our work. We will increase our focus on celebrating effective and efficient ways of delivering higher education. We will be vocal about methods of exemplary compliance in the interests of transparency. We will convene groups of providers with shared issues to assist in exploring matters of emerging concern and in mutually supporting compliance, and we will act as an advocate for the higher education sector where appropriate. Overall, and consistent with the spirit of the conclusions of the Behan review and our new strategy, we will have a greater focus on encouraging improvement within English higher education.

Lesson 1: Respectful relationships

We will ensure **respectful relationships** with higher education providers.

23. The judicial review criticised the OfS's approach of making meetings with the University of Sussex to discuss settlement contingent on the university admitting that it had breached the conditions of registration (paragraphs 432 to 433).

24. The KPMG review confirmed that insufficient priority was placed on maintaining constructive engagement and dialogue with the university, which contributed to relationships becoming increasingly adversarial.

25. Our 2026 stakeholder survey found that only 43 per cent of accountable officers trust the OfS to treat their institution fairly.[7]

26. Both the House of Lords Industry and Regulators Committee report and the Behan review place a high emphasis on constructive engagement with institutions and maintaining opportunities for meaningful dialogue throughout regulatory processes.[8]

27. For the OfS to function as a regulator, it is essential that the institutions we regulate trust us, and a relationship of mutual respect is crucial to this. Following the judgment, it is more important than ever that we cultivate relationships based on mutual respect, confidence and trust.

Action 2: More collaborative working

28. As we set out in our strategy for 2025 to 2030, we are developing more collaborative ways of working with the higher education sector.[9] We work with student bodies, sector agencies and other partners that share responsibility for its stewardship, to support a cohesive regulatory environment and foster a thriving ecosystem equipped to create opportunity and drive growth. This will lead to improved regulation informed by the views of those in the sector.

29. We have, for example, worked recently with the Committee of University Chairs on governance, and with Advance HE on issues relating to artificial intelligence.

Action 3: Regular dialogue and meetings

30. We will hold regular meetings as part of our routine regulatory practice. This will mean that in most circumstances we will meet with providers to discuss any issues of concern we have,

[7] Savanta, 'Office for Students stakeholder survey report', published by the OfS.

[8] Parliament.UK, 'Office for Students: Lords Industry and Regulators Committee report'; Gov.UK, 'Fit for the future: Independent review of the Office for Students'.

[9] See OfS, 'OfS strategy 2025 to 2030'.

so that institutions have a meaningful opportunity to respond and improve before we consider opening any investigation.

Lesson 2: Communications and transparency

We will improve our **communications and transparency** relating to the investigation and enforcement process.

31. The judicial review criticised the way the OfS, in singling out Sussex for investigation, did not engage with other institutions that held similar policies (paragraphs 434 to 435).

32. The input we received from groups in the higher education sector includes a concern that institutions are not always given sufficient clarity on the basis, scope and requirements of our investigations, how they are undertaken, who makes decisions and how we decide remedies. This can include, for instance, why an investigation has been opened, what is expected of the institution during the investigation, how it can most effectively engage with the process, and the expected timescales.

33. A lack of transparent communication about our investigation and enforcement function generally has contributed to a loss of trust in our regulation. Again, we must work to restore this.

Action 4: Meetings during investigations

34. We now have more regular dialogue with providers we are investigating and we will agree further meetings where this is helpful to ensure the provider understands our findings or the process we are following. We will not require providers to admit to a breach of the conditions before we meet with them, regardless of any settlement we recommend. We will develop clear processes outlining when and how we will engage with providers during our investigations, to ensure that our approach is consistent across the sector. We will meet any provider we are investigating that wants to meet us, at least once in every investigation, and will generally seek to agree regular touchpoints with providers during investigations.

Action 5: More transparent investigations

35. We will improve the transparency of our investigations, ensuring that providers have clearer guidance and information about the type of and process for any investigations. We will publish that guidance during this year.

Action 6: Revised regulatory framework

36. In the autumn we expect to publish and lay before parliament an updated version of the OfS regulatory framework, which will collect and consolidate changes to our guidance including those made in response to the University of Sussex judgment. This will ensure that comprehensive, consistent and up-to-date guidance is available in a single document. In future, we will update the regulatory framework as soon as possible after making changes, and at least once a year.

Lesson 3: Alternative forms of intervention

We will, where possible, use **alternative forms of intervention** to effect change before taking enforcement action.

37. The judicial review found that the OfS had a ‘fixed intent’ to find a breach of the conditions at the University of Sussex (paragraphs 428 to 431). It also found that the OfS ‘closed its mind’ to any evidence that the university had taken measures to comply with the conditions (paragraph 438).

38. The feedback we have seen from the higher education sector includes the view that the fine of £585,000 was disproportionate and unduly punitive.

Action 7: Opportunities for compliance before enforcement

39. We have been considering our regulatory approach. In future, we will typically expect to offer institutions the opportunity to address our concerns through compliance activity before we consider whether to begin a formal investigation. A provider’s response to this opportunity will help determine whether an investigation is launched.

40. We will continue to use enforcement action where needed to protect students or protect public funding. In some cases, we will need to do so quickly and without prior discussion. These occasions would depend on a number of factors, which would include the nature and seriousness of any concerns that we hold.

Lesson 4: Structure and processes

We will strengthen our **structure and processes**, including to guard more effectively against the risk of predetermination and decision momentum.

41. The judicial review found that senior leadership involvement in this particular case was intense and overarching and entirely shaped the process (paragraph 429). It also identified a lack of independence in the decision making committee (paragraphs 439 to 442). The KPMG review similarly found that concentrating decision making and delivery responsibilities within a relatively small group reduced opportunities for independent challenge and fresh perspectives. Apart from review by the committee, the investigation process provided limited scope for explicit, objective review.

42. KPMG also found that the boundary between developing OfS policy and investigating and enforcing compliance was blurred in the Sussex case. These functions must be consistent, but they are distinct: policy development is general and principles-led, while enforcement applies those policies to specific cases. If this boundary is unclear, a senior leadership preference may gather 'decision momentum' and harden into a decision that becomes difficult to challenge.

43. These structural weaknesses were reflected in the way the case was handled. The judicial review found that the OfS intended to signal to regulated higher education institutions the importance of compliance (paragraphs 428 to 431). In pursuing that aim, however, the OfS did not examine all relevant documents and therefore failed to consider the full picture (paragraph 436). The review also found that contemporaneous OfS records did not contain enough evidence to clarify aspects of the decision making process (paragraphs 439 to 442).

44. Although the procedure for opening an investigation has since changed, KPMG found that it lacked a clear sign-off process and accountable roles at the time. KPMG also identified a gap between interviewees' recollection of robust challenge and the written record. Interviewees consistently described discussions, particularly within the decision making committee, as testing different views and alternative options. Formal records, by contrast, focused on final decisions rather than the discussion and rationale that informed them.

45. The feedback we have seen also shows that the higher education sector perceives inconsistency between our approaches to different investigations. Investigations have sometimes taken a long time to complete, as happened in this case. These delays have reduced their value and caused stress and uncertainty for staff and students at these institutions.

46. In the University of Sussex case, the outcome did ultimately influence other institutions, but only after a decision making process that took several years. We need to consider the best way to respond to each case, so that we can send a speedy signal to the higher education sector while still achieving the right outcomes for the institution.

47. Taken together, weaknesses in both structure and process increased the risk of predetermination. In particular, the lack of review points identified by KPMG did not provide

sufficient protection against that risk. Any perception of predetermination damages a regulator's reputation for impartiality and fairness and makes it harder to engage effectively with regulated institutions. KPMG has identified opportunities to improve our arrangements and reduce the risks of predetermination and decision momentum in future cases.

48. Our systems should ensure that decisions are robust. Records of decision making should be comprehensive, clear and transparent enough to withstand later examination and provide a full account of events. For the OfS to operate at its best, its regulatory processes must be fully developed and capable of standing up to rigorous scrutiny.

Action 8: External review and regulatory comparison project

49. We are commissioning a review of our structure, oversight and processes. The review will take into account feedback from our staff and the higher education sector. It will recommend options for any changes in how we operate to help us become the exemplary regulator we want to be. These recommendations are expected by the end of 2026.

50. The aim is that these changes will improve our effectiveness, clarify accountability and decision making, optimise the use of our workforce, make us more resilient and adaptable, improve our delivery of our objectives and establish a suitable operating model for the future.

51. To feed into the external review, we have begun a project to compare our own regulation operations with those of other regulators in the UK, and with other higher education regulators internationally. We are particularly interested in how these regulators approach investigations, decision making, publication of information, relationship management and consultations.

52. We will also draw on the extensive experience of our staff in working with and at other UK regulators as well as the providers we regulate. We will use this to reflect on our own practices and learn from others.

Action 9: New team structure

53. We have established a new specialist enforcement team within the OfS. This area of work has clear accountability and is run separately from policy development, ensuring an independent approach. To conclude our investigations more quickly, we are growing this team and expanding its available skillset so we increase our investigative capability and capacity.

54. We have also established two new Core Regulatory Teams within the Regulation Directorate: a financial sustainability provider engagement team; and a specialist team to focus on management and governance, with an immediate focus on those institutions presenting the highest risks to protecting public funding. This will help us build deeper expertise and more focused engagement.

Action 10: New internal oversight arrangements

55. We are refreshing our existing oversight arrangements to help us decide our regulatory approach to individual cases. This includes producing clear guidance, templates and expectations for investigations and enforcement.

56. We are also strengthening the quality, consistency and evidential basis of our decision making. This includes considering both who should make decisions and the process for how decisions are reached.

Lesson 5: OfS culture

We will review our **OfS culture** to encourage challenge and agility.

57. Many of the judicial review's conclusions relate to closed-mindedness. This is likely to have discouraged those who held differing views from raising them.

58. This, coupled with the findings above, suggests that the OfS's internal staff culture has too often been rigid: staff need to feel more empowered to challenge senior viewpoints as well as welcoming challenge from the higher education sector. In the interests of becoming an exemplary regulator, we intend to change this.

Action 11: Embedding the OfS attitudes

59. We are working to bring the internal culture of the OfS into line with the attitudes outlined in our strategy of being:

    - ambitious for all students from all backgrounds
    - collaborative in pursuit of our priorities and in our stewardship of the sector
    - vigilant about safeguarding public money and student fees
    - vocal that higher education is a force for good, for individuals, communities and the country.[10]

60. We have already embedded the attitudes within our competency framework for all staff, included them in staff learning and communications, and introduced a mechanism to recognise staff who demonstrate them. The attitudes are becoming a core component of how we test our decisions and monitor our performance against the strategy.

Action 12: Cultural change programme

61. We are undertaking a full review of our culture to establish a programme that will enable us to build our analytic confidence and agility, and our willingness to give and accept challenge. This applies to challenge to and from one another, including senior colleagues, and from the sector.

62. This will involve listening to our staff, understanding where we can remove barriers and provide better feedback loops both internally and externally. The information we gather will help us design actions to address rigidity and lack of challenge over the next two years.

[10] See OfS, 'OfS strategy 2025 to 2030'.

Action 13: Evaluation of behavioural impact

63. We will evaluate the behavioural impact of the changes that are already under way, including changes to our decision making processes and culture. We will achieve this in part through our regular people surveys and pulse surveys, and in part through specific evaluation of our actions.

Conclusion

64. These five lessons, and our overarching no surprises approach, arise from our careful consideration of the judgment, and will inform our future direction of travel. The OfS is already changing in response to our aspiration to become an exemplary regulator. The 13 actions we will take in response to the lessons will help to shape the future of our regulatory work. However, this work is only one part of our role, and we use a broader range of approaches to support compliance.

65. As outlined in our strategy for 2025 to 2030, we will regulate in a way that enables universities and colleges to drive growth, create opportunity, champion free expression and support a flourishing society. We firmly intend to hold ourselves to account in doing so, which includes learning these lessons and putting the actions into practice. We will report regularly to our Board on our progress and will include an update in our annual report and accounts. We will continue to publish key performance measures and will look carefully at the feedback we get from the sector, students and other stakeholders to check that they are feeling the benefits of the changes in our approach.

66. We look forward to working with the institutions we regulate, and with the higher education sector as a whole, to put into practice the letter and spirit of these lessons. We hope our colleagues in these institutions and bodies will respond supportively and work with us in the same constructive spirit, changing their behaviours where required, challenging us where appropriate and holding us to account where we fall short.

Annex A: KPMG's findings

Approach

The approach to this work consisted of a high-level review of the judgment, eight one-hour interviews with key OfS staff involved in the University of Sussex case and a workshop with relevant OfS staff members to consider the strategic impact of these themes.

Governance

The case was started while the OfS was still a relatively new organisation, and some interviewees believed that the distinction was blurred between policy development on the one hand, and investigation and enforcement activity on the other. There is also a gap between what people remember as robust challenge in discussions and what is clearly captured in written records.

Regulatory decision making

There were mixed comments in the interviews on the current approach to regulation and how this has changed over time. In this case, it appears that insufficient emphasis was placed on maintaining constructive engagement and dialogue with higher education providers, which contributed to relationships becoming increasingly adversarial.

Decision momentum and bias risk

It is unclear exactly when the decisions made early on were revisited. Interviewees described challenging the decisions, and observed the committee discussions as being robust. Other than the OfS's University of Sussex Compliance and Enforcement Committee, there was limited objective review explicitly built into the process.

Ways of working

The investigation team was made up of particularly senior staff, reflecting the case's novelty, complexity and profile. However, the concentration of decision making and delivery responsibilities within a relatively small group reduced the opportunity for independent challenge and fresh perspectives. The procedure to open an investigation (which has now changed) lacked a clear process for signoff and accountable roles.

Annex B: KPMG's methodology

Approach

1. The approach to this work consisted of the following core activities:

    a. A high-level review of the judgment, particularly Issue 5 (Ground 6C) – Bias and Predetermination.

    b. Eight one-hour interviews with key OfS staff involved in the University of Sussex case.

    c. A workshop with OfS staff members involved in the case, and staff employed since who have experience from other regulators, to test the identified themes and consider how this work can be taken forward in a meaningful way.

Staff interviews (5 to 25 June 2026)

2. Semi-structured interviews were designed specifically around the judgment, providing OfS colleagues with the opportunity to reflect openly. These interviews were undertaken as a listening exercise, with questions signed off by OfS colleagues in advance.

3. The interviews were guided by the following objectives:

    a. Understand how key decisions were made throughout the Sussex case, including governance, escalation routes, and critical decision points.

    b. Assess how staff experiences of how decisions were developed, discussed, and approved align with formal processes.

    c. Identify whether there were perceptions or experiences of predetermination experienced by those working on the case and what may have contributed to this.

    d. Evaluate whether colleagues felt able to openly challenge and influence decisions.

    e. Understand how the environment and culture of OfS influenced the fairness and defensibility of decisions made during the case.

    f. Understand the views of colleagues who worked on the Sussex case judgment.

    g. Understand perceptions on the actions taken by OfS following the decision, which have addressed cultural risks and improved decision making practices.

    h. Capture forward-looking views on how OfS can strengthen culture, enable constructive challenge, and reduce the risk of real or perceived predetermination in future cases.

Lessons learned workshop (30 June 2026)

4. Following the staff interviews, this workshop aimed to be a strategic exercise, enabling senior colleagues to reflect on the outcome of the interviews, and consider what the OfS can do in response to these themes.

5. The workshop's purpose was to provide an opportunity for colleagues to reflect on the themes identified in the interviews and consider the impact of these themes on the current and future investigations approach, and the wider culture within the team. Its objectives were to use the identified themes to confirm:

    a. What actions have already been taken?

    b. What else, if anything, is needed to embed the findings from the judgment?

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