











student outcomes, especially on employment, should be prioritised within the proposed definition.

Student outcomes are not within the power of a provider to guarantee. The focus on employment outcomes, in particular, is underpinned by an assumed *direct* correlation between quality and outcomes. While a course's quality may be a contributing factor it is not the only one. We would expect a high-quality academic experience to help students reach their aspirations with well-designed and well-delivered courses and student support services. Many universities have developed good relationships with graduate employers and the expansion of courses with work placement components and investment in careers services further supports this. Notwithstanding this outcome data requires contextualising to reflect the challenges and achievements of students from all backgrounds. However, students will have different aspirations that will shape their preferences for what they do upon graduation and what a 'successful outcome' is for them. If this does not align with the OfS definition, it is not indicative of poor quality but a misunderstanding of different student interests.

The proposed approach neglects the role of student agency, behaviour and preferences, the influence of their socio-economic and demographic characteristics on life chances, and the wider social and









However, as a sector we are committed to ensuring that where there are concerns about low quality, that these are investigated and addressed. UUK's work developing a charter for enhancing portfolio reviews is one way in which the sector is acting on this issue.

Within this, definitions and consistency in practice are vital. In a similar way, the definitions in Table 1 of Annex A need to be further developed to establish shared understanding of what individual providers should be striving towards and how they will be expected to demonstrate meeting regulatory requirements. As above, the UK Quality Code and accompanying advice and guidance provides a useful starting point, as will the work UUK is currently undertaking.

For their assessment, we recommend attention is paid to feedback from students, PSRBs, and external examiners on the extent to which the quality and standards of provision meet their needs and expectations. There needs to be more consideration given to how proposed feedback from employers will be collected – for example, to determine whether graduates have the relevant skills and knowledge, and how the OCS would determine whether employer expectations were reasonable.

**The definitions** should also be assessed with reference to contextual information about the type of provision on offer and the students enrolled, utilising both quantitative and qualitative data.



provision is of a high quality there may be pockets of low quality, for example at a subject or course level, that need addressing. Ensuring students are





recognise the importance of the measure for student information so would recommend the OfS focusing its attention on how it can increase its robustness and presentation to best meet students' needs.

If and where the OfS is committed to measuring outcomes, they also need to consider the value added to the individual through measures such as learning gain. Further quantitative measures should seek to enrich information relating to student choice alongside any outcomes data. This may include integrating questions related to graduate voice as developed by HESA. Here questions related to outcomes would be benchmarked 'in relation to their own goals and motivations', having the benefit of giving greater agency to individuals meeting the consultation commitment in Annex B paragraph 40 'never to lose sight of the individuality of each student'.

While we maintain that the OfS should focus on quality rather than value, *if* the focus on outcomes is retained there are other indicators that would need to be considered. Work by UUK on value has previously argued the need to

on access to appropriate and reliable data. We





Question 2e: Do you agree or disagree with the demographic characteristics we propose to use (see Annex B paragraph 36)? Are there further demographic characteristics which we should consider including in the list of 'split indicators'?

We support the proposed demographic characteristics for inclusion as 'split indicators'. However, we would extend this to include data on care leaver status, free school meal eligibility, and English as a second language. These characteristics relate specifically to individual students, as opposed to the area-based measures of POLAR and English IMD.

LEO would need to acknowledge that historic data will not reflect the current labour market.



Questions relating to proposal 3 – Clarify the indicators and approach used for risk-based monitoring of quality and standards.

Question 3: Do you agree or disagree with the proposals in Annex C for monitoring ongoing compliance with regulatory requirements for quality and standards?

We agree that the OfS should focus on using and constructing indicators from data and intelligence already available, to minimise additional burden. Of the indicators proposed under paragraph 4 in annex C, we have the following views:

Student voice should be accessed primarily through the NSS or an equivalently robust national survey that permits within-institution time-series comparisons. Ad hoc student polling should be reserved for the OfS understanding sector-wide issues and not regulatory monitoring of individual providers. We recommend that consideration is given within the current review of NSS to how the survey can better inform an assessment of quality and standards and what happens at providers or within subjects where the sample size is not adequate. The suggestion to use complaints data and OIA cases as lead indicators requires further specification as both providers and the OIA handle complaints for non-academic matters (for example, accommodation), thereby with no relevance to quality and standards. Reference to outcomes of OIA complaints rather than inputs into the system might be more helpful.

The OfS must set out a clear and transparent process by which it will assess patterns within student complaints.

Admissions indicators need to be considered alongside monitoring of

While the outcomes of the TEF review are pending we recognise the benefits of a common language across regulatory areas. If – as suggested in the proposal – the B conditions purpose is to set minimum standards and for the TEF to incentivise excellence above this then it is unclear why a ‘low’ TEF rating would constitute the need for any compliance requirements. If a bronze level TEF meets rigorous national quality requirements, the proposed approach contradicts the grounds of awarding the TEF. All TEF ratings are awards for high teaching and outcomes standards. To mitigate confusion, decisions related to minimum baselines should only be made through the B conditions and the TEF, if retained, used for enhancement.

We note that a consultation on reportable events was launched on 15 December which means there is some uncertainty when reflecting on the proposed approach here. For example, we do not know how the OfS will analyse responses to this consultation (e.g., the examples in paragraph 12 of annex C) if they are different to those received in the reportable events consultation (OfS 2020.62). We also do not know at this stage what the reportable events process will look like to be able to comment on its4.31 439.99 Tm0 g0 G(a)4(t



'Students have the right skills from their course once in employment and



Confusion emerging internationally about UK HE 's quality and standards and potential damage to the UK HE brand, impacting on international recruitment and TNE partnership opportunities.  
A weakening of opportunities for cross-UK working and collaboration if the link to the UK Quality Code is broken

attainment gaps at a school level may not have

This is needed so that providers can focus on ensuring the health, safety and wellbeing of their students while maintaining quality and standards. The volume of consultation activity currently underway risks either distracting providers from their central goal of supporting students and staff at a time of significant challenge or leaving providers unable to dedicate sufficient time to providing detailed feedback on OfS proposals.