

Securing student success: risk-based regulation for teaching excellence, social mobility and informed choice in higher education - Government consultation on behalf of the Office for Students

1. Do you agree or disagree that these are the right risks for the OfS to prioritise?

All of these risks are important ones for the OfS to monitor, though we note that there is a bias towards non-educational issues (e.g. two of the four objectives relate to consumer rights and value for money). We call on the OfS to ensure that quality and social justice (i.e. access and participation) are priorities for the new regulatory body.

We note that the OfS proposes to adopt a different approach to the access and participation objective/risk, i.e. OfS will intervene at the provider level as well as sectorally. While we agree that *competition, choice and market mechanisms are not able to deliver the outcomes needed for students*

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Secondly, there is a need to ensure that widening participation and social justice is at the heart of higher education policy. This will require real action on the part of universities, for example in tackling degree

5. Do you agree or disagree that a student contracts condition should apply to providers in the Approved categories, to address the lack of consistency in providers' adherence to consumer protection law?

In addition, we believe that there are major problems with the current TEF, both in terms of its methodology and the outcomes for institutions, staff and students. Firstly, the core metrics that are used - student satisfaction via the NSS, retention rates and graduate outcomes - are flawed for the purposes of assessing teaching quality. Secondly, there is the potential for 'unintended consequences', such as encouraging institutions to change their student intake to improve their chances of success on the core metrics.



main concern is for students, who appear to have extremely

We agree with the broad principles for engaging with other bodies. The key issue will be translating this