

## DRAFT RESPONSE

### OfS consultation on calculating Student numbers

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#### 1. What do you think about how we propose to measure intensity of study?

- What are the benefits of this approach?

MillionPlus welcomes moves to develop a more refined approach to measuring intensity of study in relation to calculating student numbers. There are a variety of different learning pathways available in a diverse higher education sector. Moving away from a stark binary division of full-time and part-time helps account for this distinction in a more effective manner. Moreover, definitions of full-time and part-time study can vary from one institution to another and is therefore a more textured method of measuring intensity of study while avoiding confusion or a muddle of different learning styles in the calculation of student numbers.

- Do you have any concerns about this approach? If so, what and why?

While MillionPlus would advocate developing how we measure intensity of study, the backgrounds, characteristics and study patterns of part-time students must remain a part of any measurement. Therefore, the recording of part-time students should not be abandoned. As explained above, the binary of full-time/part-time does not adequately capture the full diversity of learning pathways on offer in the sector, but those opting to study on a part-time basis will do so because of external factors and commitments such as work and caring responsibilities. The risk with only recording and reporting intensity is the needs of particularly students – such as mature learners – may well be overlooked.

Related to this, the decline in part-time students is at present one of the greatest challenges facing UK higher education and needs to be a high priority of the OfS. Removing any function with which to measure the number of part-time students in these calculations poses the serious risk of ‘throwing the baby out with the bath water’.

A separate challenge lies in the definitions or metrics used for intensity of study. These must be clearly defined and flexible to the full range of providers. If these are not communicated effectively there is a danger of inconsistency across the sector and divergence in what is reported.

2. What do you think about our proposal to include a provider's overseas activity in the student number calculation once reliable data becomes available?

- What are the benefits of this approach?

Including a provider's overseas activity in the student number calculations would give a more accurate reflection of the full scope and reach of the institution. Many modern universities, while rooted in their local community or region, are outward-looking, international organisations. Overseas activity is an integral part of many modern universities structure and mission that helps foster international collaboration and partnership. This increases the reputation and reach of the university and contributes towards growth and expansion of the whole institution. Inclusion of these figures in the calculations will therefore create a more accurate picture of the institution with the risk that lies therein. As the OfS has clearly laid out its intentions to be a risk-based regulator, it follows logically that such information should be at their disposal so as best to assess the risk of a provider.

Do you have any concerns about this approach? If so, what and why?

Paragraph 34, the only part which covers this topic, is limited to say the very least. The paragraph is somewhat contradictory in its messaging in that it reasons that students studying abroad should be included in the figures but states that this is not possible at present. Despite explaining that the aim is to include these numbers when they become available, there is no information as to how this information might be collected or when this might be possible.

3. What do you think about our proposal to include all higher education provision, including provision the OfS will not generally fund, such as provision listed on the Ofqual register of regulated qualifications?

- What are the benefits of this approach?

MillionPlus would welcome recognition of provision of courses at level 4 and level 5 within the HE sector. Such a move would be in line with conclusions that came out of previous consultations on the regulatory framework, which confirmed a preference for adopting a more flexible approach to the level 6 criterion in relation to TDAPs.

- *Do you have any concerns about this approach? If so, what and why?*

There is some concern, as stated in our response to the regulatory framework consultations, that a more flexible approach to the inclusion of level 4 and 5 student numbers could lead to "lowering of the bar" for new providers. Dilution of the presence of the numbers of level 6 students within the data could contribute towards the unintended consequence of moving the goalposts for new providers and result in damage to the overall reputation of the sector across the globe.

In publishing its response to this consultation, it would be useful for OfS to consider a more fulsome explanation of the phrase "will generally not fund". Increasingly it is the case that OfS does not fund provision per se, but instead offers support for some high costs and some access and participation priorities. The language of "will generally not fund" appears to hark back to the old HEFCE definitions of funded and fundable. As new providers apply and are accepted on the register, their students may trigger financial support from OfS, even if their provision does not. A more explicit definition of this distinction may be helpful to prevent people interpreting the approach with historic understandings in mind.

4. What do you think about our proposal to use existing data, where possible, to calculate student numbers?

- What are the benefits of this approach?

The benefits of such an approach would be to achieve consistency with previous data while also minimising the burden on providers.

- Do you have any concerns about this approach? If so, what and why?

It is unclear how this question relates to answers given to questions 2 and 3 insofar as they could result in changes to how data is recorded (intensity of study or inclusion of different levels of higher education provision). Does this assume the existing data sets to include these proposed changes? In other words what will the impact of the proposals covered in questions 2 and 3 be on the existing data sets of providers? Does this need to be factored in or is this a separate issue. MillionPlus believes it would be helpful for the OfS to offer a little more clarity surrounding these questions.

5. We have proposed that the same approach to counting student activity should apply across all the regulatory activities mentioned above (i.e. to assess applications for degree awarding powers and university title, to determine mandatory participation in the TEF and to determine what band a provider is in for registration fees). Do you have any concerns about its application to one or more of these activities? If so, which one(s) and why?

MillionPlus is not opposed in principle to the idea of creating one consistent approach to all regulatory activities mentioned in the consultation document. The problem is that much detail is yet to be decided, and many questions remain unanswered as to the form and function of such an approach. Without more information on the content of such approach, it is very difficult to comment on its capacity to be applied universally, or at least to all the main regulatory activities mentioned in the consultation.

MillionPlus appreciates that this is a work in progress, and that this is an ongoing process of development but until some issues are further clarified (e.g. how intensity of study will be measured or categorised) it is almost impossible to comment concretely on the proposals. One point of contention may be the use of such an approach in determining mandatory participation in the TEF. MillionPlus has previously stated its opposition to the use of metrics measuring teaching intensity as part of the TEF. This of course, is separate from the numbers used to calculate participation in the TEF. But if such metrics, or combinations of such metrics were used, this would be cause for concern

6. Overall, what do you think about the proposed principles of the new method for calculating student numbers?
- Is there anything you would like to see added? If so, what and why?
  - Is there anything you would like to see changed? If so, what and why?