

## DRAFT RESPONSE

# Office for Students strategy 2025-2030

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1. MillionPlus, The Association for Modern Universities, welcomes the opportunity to contribute a response to the Office for Students (OfS) consultation on their strategy. We look forward to continuing our engagement with the OfS team as they develop these proposals further in the months ahead.

### **QUESTION 1: DO YOU HAVE ANY COMMENTS TO MAKE ON THE OFS'S PROPOSED STRATEGY FOR 2025 TO 2030 OR THE PRIORITIES SET OUT WITHIN IT?**

#### Core missions

2. MillionPlus are concerned that the breadth of strategic priorities captured within the proposals are not sufficiently focused on the core mission of higher education. There is a risk that the extensive range of areas and activities underpinning these priorities will negatively impact the ability of institutions to focus on and deliver against their primary role of teaching and learning.
3. The broad definition attached to 'the wider student interest', including students benefitting from 'rich and rewarding wider environments', is likely to lead to a lack of clarity surrounding the key priorities and areas that institutions should invest in and deliver against.
4. The inclusion of non-academic features of higher education including accommodation and mental health is particularly concerning, especially given the number of wider influences on these issues beyond the control of the education provider.
5. The OfS have recognised that some students are inherently more likely than others to face challenges in non-academic areas of their higher education experience. This runs the risk of placing institutions with more diverse student intakes at a disadvantage when compared to others in the sector and could even act to disincentivise widening access and participation efforts.
6. As part of the equality of opportunity priority, the strategy document also notes that the OfS will encourage a focus on activities to raise attainment in schools through university access and participation plans. While several institutions undertake these activities as part of their civic role in the community, these activities need to be balanced against the wider activities of the universities which support their student cohorts.
7. These concerns are exacerbated by the ongoing financial challenges institutions are experiencing, with many universities now facing difficult decisions regarding which areas and services to make cuts in. We encourage the OfS to reconsider the breadth of areas they wish to include within their strategic priorities and ensure this is reflective of both the financial context the sector is facing, as well as the core mission of institutions, to deliver high quality teaching and learning to students, irrespective of background.

#### A student centric approach

8. MillionPlus shares the commitment of the OfS to reduce risks to equality of opportunity. We welcome the acknowledgement that the increasingly challenging context students are facing is disproportionately impacting some student groups, namely those from lower socio-economic backgrounds. MillionPlus

encourages the OfS to continue to work with us and our member institutions to identify and support the students facing the greatest barriers to engaging with their studies fully and effectively.

9. The student centric approach which the OfS proposes is welcome. As this develops further, it is vital that student engagement is secured from a diverse set of students from across the sector, with representation from across the regions, institution type, course type, subjects studied and student demographics. This is particularly important to consider as the OfS creates the new student interest board.

#### Minimising burden

10. MillionPlus welcomes the ambition to minimise regulatory burden through the use of data and greater collaboration with other regulators to avoid duplication. However, there is a tension between this and the proposal for the OfS to seek new powers to enhance and protect student's consumer rights.
11. MillionPlus are keen to engage further with the OfS to share insights from our member universities on how wider regulatory burden could be minimised further to ensure this can be achieved, both promptly and comprehensively.

#### Developing the macro picture

12. In respect of the role the OfS plan to take in monitoring and communicating the impact of financial pressures on student choice, MillionPlus would particularly encourage the OfS to give thorough consideration to the current and future supply of course provision at a regional level.
13. MillionPlus would urge the OfS to ensure this intelligence and its potential longer-term impact on the skills pipeline is shared with both government Ministers and the sector as a whole, especially given the impact this could have on higher education access for those from less advantaged backgrounds.

#### **QUESTION 2: DO YOU HAVE ANY COMMENTS ABOUT ANY UNINTENDED CONSEQUENCES OF THE PROPOSED STRATEGY, OR THE PRIORITIES SET OUT WITHIN IT, FOR EXAMPLE FOR PARTICULAR TYPES OF PROVIDERS, PARTICULAR GROUPS OF STUDENTS, OR FOR INDIVIDUALS ON THE BASIS OF THEIR PROTECTED CHARACTERISTICS?**

14. While the OfS state their intention to use their resources efficiently and effectively, MillionPlus considers there to be a tension between this ambition and the breadth of the strategic priorities set out by the OfS. For example, under the strategic priority of Quality, the OfS state they will work to ensure that 'Prospective students have a range of high-quality options and are well equipped to exercise informed choice about what, where, when and how they study.'
15. The OfS have taken the decision to pause their duty to register new providers and consider new candidates for degree-awarding powers and university status. However, this pause is taking place alongside a consultation which proposes that franchised providers with over 300 students should be directly regulated by the OfS. MillionPlus is concerned that the existing pause will build delays into the registration system, which will likely impact the ability for franchised providers to register promptly and continue to offer important provision to students. We encourage the OfS to resume their registration activities at the earliest opportunity to ensure these decisions do not impede student choice.

#### **QUESTION 3: ARE THERE ASPECTS OF THE PROPOSALS YOU FOUND UNCLEAR? IF SO, PLEASE SPECIFY WHICH, AND TELL US WHY.**

16. The OfS note that they will work with government and the newly created Skills England to develop a shared understanding of the extent to which higher education is delivering the skills needed by the economy. MillionPlus would welcome further clarity on how the relationship between these two bodies will work in practice, how this relationship will evolve throughout the phased introduction of Skills England and how this will impact higher education institutions.

**QUESTION 4: OUR PREVIOUS STRATEGIES HAVE COVERED PERIODS OF THREE YEARS. FOR THIS STRATEGY, WE ARE PROPOSING AN EXTENDED STRATEGY PERIOD OF FIVE YEARS. DO YOU HAVE COMMENTS ON THIS PROPOSAL?**

17. Given the number of significant challenges and the period of change the higher education sector is currently experiencing, MillionPlus are concerned by the proposal from the OfS to create a five-year strategy.
18. The financial challenges facing institutions are both severe and ongoing. As well as the changes which are emerging as a result of these, universities are also preparing for the upcoming implementation of the Lifelong Learning Entitlement (LLE), which will mark a significant systemic shift. Meanwhile, the government is expected to shortly announce and consult on a new post-16 skills strategy which will set the longer-term vision for tertiary education in England.
19. Given the considerable level of both challenge and change, agility and flex will be of the utmost importance throughout this period. In this context, MillionPlus proposes that the OfS develop a strategy with a maximum duration of two years. This would provide the OfS with greater scope to adapt in accordance to the changes the sector undergoes and ensure the developments and final design of both the skills strategy and LLE can be fully considered and accounted for in future regulatory strategies.

**5A) DO YOU THINK THAT OUR PROPOSED 'I STATEMENTS' APPROPRIATELY AND CLEARLY DESCRIBE THE IMPACT THAT DELIVERY OF OUR STRATEGIC OBJECTIVES SHOULD HAVE ON OUR KEY STAKEHOLDERS?**

**5B) DO YOU THINK THAT THE STRATEGIC OBJECTIVES DISTILLED IN OUR PROPOSED 'I STATEMENTS' ARE THE RIGHT ONES? DO YOU PROPOSE ANY ADDITIONAL 'I STATEMENTS'?**

20. In respect of the 'I statements' proposed, while MillionPlus generally agree that these are worthy ambitions, it is important that these statements recognise that students are active participants in their learning who have agency over both the experience and outcomes that result, rather than being passive recipients. As currently drafted, we do not consider the 'I statements' capture this.
21. It is also important to acknowledge that there may be challenges to fulfilling these statements which are beyond the direct control of universities. For example, there may be student engagement barriers which exist due to financial limitations, which the university can often offer support to address, but may not be capable of eliminating.
22. In developing and taking forward any 'I statements', it is vital that the OfS recognise that these will be fulfilled in different ways, depending on the institutional context, subject studied and student intake, among other factors. MillionPlus urge the OfS to avoid a one size fits all approach and ensure this does not result in a prescriptive set of underpinning guidance surrounding how these 'I statements' should be achieved.
23. We are concerned that some statements are highly subjective, for example 'I'm getting what I was promised when I signed up for my course – my hopes and expectations when I chose it are being met'. This would leave institutions open to fulfilling a broad range of undefined expectations and we strongly urge the OfS to reconsider this approach.
24. It is important for the OfS to recognise that it will also be more challenging for some universities to achieve agreement with these statements among their student cohort than others, given the demographics and profile of their intake. We encourage the OfS to consider how they can build greater recognition of the varying challenges that different institutions and students face into their approach.