**Question 1**

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

*Slightly agree*

We strongly approve of objectives which aim to ensure wide access to higher education, and to ensure students have a high-quality academic experience.

We are disappointed that the higher education sector has reached a point where ‘consumer protection’ is required to be part of the OfS’s mission. This is a sad indictment of the marketised state of the sector at present. Given the government’s present direction, we do agree that the OfS should seek to ensure students are protected, but wish it were not required.

We firmly do not believe that value for money for individual students should be an objective of the Office for Students. We believe education is a societal good, not a private investment, and should be treated as such.

Advocating in students’ interests (as Students’ Unions do) at the present time involve advocating greater public funding, not passively ensuring good ‘value’.

Ensuring that public value is achieved (including value for money) is an important principle, but a conception of public value should guide the OfS away from a narrow focus on students as consumers and ensure that universities operate in the interests of the wider public.

**Question 2**

**Given all the levers at its disposal, including but not limited to Access and Participation Plans, what else could the OfS be doing to improve access and participation and where might it be appropriate to take a more risk-based approach?**

The approach outlined here seems sensible, and we hope to see the broader range of powers at the OfS’ disposal used to drive progress in this area at a faster rate. We would however, expect to see providers continue to develop targets collaboratively with the OfS as presently, and for them to be publically accountable for these targets. The text is not clear on whether arrangements such as Access Agreements will continue.

**Question 3**

**Do you agree or disagree that a new Quality Review system should focus on securing outcomes for students to an expected standard, rather than focusing on how outcomes are achieved?**

*Strongly Disagree*

Quality Assurance processes are expressly not about simply measuring outcomes, but about scrutinising process to ensure that those outcomes will continue to be positive in the future. The proposed approach is not a Quality Assurance process at all. An outcome-based approach does not and cannot mitigate and contain future risk, but simply indicates that nothing has gone wrong in the past. For this reason we strongly disagree that this new approach is in the interests of students.

Additionally, the role of TEF appears to be to look at student outcomes, so adding an additional process which does the same seems highly duplicative.

Should there be a desire to make Quality Assurance more light-touch, this should be done in a way which continues to mitigate future risk.

**Question 4**

**Would exploring alternative methods of assessment, including Grade Point Average (GPA), be something that the OfS should consider, alongside the work the sector is undertaking itself to agree sector-recognised standards?**

No. The sector has been round is circles on this. Stop trying to make GPA happen. It’s not going to happen.

**Question 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?**

*Slightly Agree*

We largely agree with this, though we believe if anything that providers commitments should surpass consumer law.

A clear priority in this area is including a requirement that institutions’ complaint handling should be timely. Many institutions drag cases out over many stages, sometimes for over a year, and this should never be the case.

**Question 6**

**What more could the OfS do to ensure students receive value for money?**

Many degrees still come with attached costs which are compulsory and for which the institution does not provide support. Regardless of whether these costs are ‘hidden’ or transparent at the point of application, they should be included within the cost of tuition, or the meaning of a ‘tuition fee’ is meaningless. Particularly for undergraduate courses, with capped fees for home students, these costs are often a way around the fee cap and should be stopped.

**Question 7**

**Do you agree or disagree that a registration condition on senior staff remuneration should apply to providers in the Approved categories? Are there any particular areas on which you think should the OfS should focus when highlighting good practice?**

*Strongly agree*

We strongly agree that senior pay should be curbed, and believe that its growth reflects an increasing divide between university managers and the wider academic body which they are supposedly drawn from. Academic staff and students should be represented on remuneration committees as a minimum.

**Question 8**

**What are your views on the potential equality impacts of the proposals that are set out in this consultation? Please provide any relevant evidence if you can as this will support policy development going forward.**

We believe that dropping institutional targets for widening participation will have a disproportionate impact on the admission and attainment of BME students, particularly black students.

**Question 9**

**Do you agree or disagree that participation in the TEF should be a general condition for providers in the Approved categories with 500 or more students?**

*Strongly disagree*

We would prefer institutions had the ability to opt-out of the TEF and very much hope our own would do so.

**Question 10**

**Do you agree or disagree with the proposed ongoing general registration condition requiring the publication of information on student transfer arrangements? How might the OfS best facilitate, encourage or promote the provision of student transfer arrangements?**

*Agree*

**Question 11**

**Do you agree or disagree with the proposed approach to sector level regulation in chapter 2?**

*Disagree*

**Question 15**

**Do you agree or disagree with the proposed approach on the application of conditions for providers wishing to seek a Tier 4 license?**

*Agree*