



## **LUSU response to “*Consultation on the future approach to quality regulation*” 2025 (Office for Students)**

**Submitted:** Wednesday 10<sup>th</sup> December 2025

**Information about the proposals:**

[https://www.officeforstudents.org.uk/media/ufsk1m23/consultation\\_on\\_the\\_future\\_approach\\_to\\_quality\\_regulation.pdf](https://www.officeforstudents.org.uk/media/ufsk1m23/consultation_on_the_future_approach_to_quality_regulation.pdf)

### **Proposal 1: A more integrated overall system**

#### **1a. What are your views on the proposed approach to making the system more integrated?**

In clause 33b and 34, the OfS state that they intend to incentivise providers to exceed the minimum level across the registration conditions. What constitutes the range of incentives for good performance, and sanction for poor (but above minimum) performance, available to the OfS in this regard?

In clause 33e, the OfS state their intention to “*simplify*” B3 condition on Access & Participation. We welcome the intention to ensure assessments are easier to understand for both providers and students. However, we would urge the OfS to ensure that this registration condition is not watered down or weakened in the process of simplification. This is an important measure, and we expect provider-level assessments will become critical in securing inclusion within the Industrial Strategy as the sector move towards greater specialisation.

In clause 33g, the OfS state that they intend to “*carry out targeted investigations, including visits to the provider*”. We would strongly encourage the OfS to consider periodic site visits for all providers, including those substantially above the minimum expectations. We feel this an important safeguard to ensure providers are not ‘gaming’ quality measures.

In clause 37, the OfS states that providers should “*deliver consistently high or outstanding quality*” to qualify for Gold or Silver ratings. We would expect the OfS to encourage and incentivise outstanding providers, such as Lancaster, to look beyond TEF measures to deliver consistently world-leading provision.

**1b. Do you have views on opportunities to reduce duplication of effort between the future Teaching Excellence Framework (TEF) and access and participation plans?**

From our experience, institutional TEF and APP submissions are the products of two separate quality assurance processes, undertaken by distinct groups of senior leaders. We see limited duplication in the work undertaken, and areas of focus identified, through both processes.

## **Proposal 2: Providers in scope**

**2a. What are your views on the proposal to assess all registered providers?**

No comments

**2b. Do you have any suggestions on how we could help enable smaller providers, including those that haven’t taken part in the Teaching Excellence Framework (TEF) before, to participate effectively?**

No comments

## **Proposal 3: Provision in scope**

**3a. Do you have any comments on what provision should be in scope for the first cycle? You could include comments on areas such as:**

- the inclusion of apprenticeships

- **the proposal to look separately at partnership provision.**

No comments

**3b. Do you have any comments on the proposed approach to expanding assessments to include taught postgraduate provision in future cycles?**

Given the close proximity of taught undergraduate and postgraduate provision, we feel it is appropriate to extend TEF assessments to encompass both. We feel sector-wide data on quality in PGT provision will be an invaluable resource for applicants and student representatives.

We have some concerns about the practicality of a separate UG and PGT TEF score for providers. At Lancaster, we have a large number of integrated Masters programmes in which students remain undergraduate but qualify with a level 7 award. For those students, and applicants, it is unclear which TEF award would best-inform their choice of institution.

**Proposal 4: Assessment aspects and ratings**

**4a. What are your views on the proposal to assess and rate student experience and student outcomes?**

We welcome the push to provide greater clarity between the scopes of the respective outcomes and experience assessments.

We do not see the value of an additional assessment of a provider's ability to deliver improvements (clause 63). The utility of this score seems very narrow, and broadly irrelevant to applicants.

**4b. Do you have any comments on our proposed approach to generating 'overall' provider ratings based on the two aspect ratings?**

If the generation of an overall institutional TEF award poses an administrative burden upon TEF panels, we would suggest that it is removed.

We would generally welcome a more nuanced approach to quality awards, in-which a series of assessment are more useful than a single award.

## **Proposal 5: The student experience aspect**

### **5a. What are your views on the proposed scope of the student experience aspect, and how it aligns with the relevant B conditions of registration?**

We feel the existing Student Experience indicators, though not perfect, are a workable collection of measures that are indicative of quality. We welcome the inclusion of the *Learning Opportunities* theme of the National Student Survey (clause 86). We feel it is useful indicator of depth and discursiveness within institutions' pedagogy.

In clause 87, the OfS outlines potential alternative arrangements for student submissions. Our belief is that every institution, even the smallest, is capable of resourcing student representatives to undertake this work.

We have a strong belief that focus groups are an inadequate replacement for a student submission. Our experience is that focus group delivery within institutions is frequently done without adequate mitigation for existing staff-student power dynamics. The student submission offers student representatives a powerful opportunity to critique providers direct to the regulator. Regardless of the providers' size, specialism, or context; we do not feel it is appropriate to remove this opportunity. We would like to see the OfS doing more to address the power exerted by institutions on independent student representative bodies.

### **5b. What are your views on our initial thoughts on the criteria for the student experience rating (at Annex H)? You could include comments on:**

- **whether the 'course content and delivery' criteria suggested in Annex H should be framed differently for a provider-level assessment**
- **whether there is clear enough differentiation between each level, and how this could be improved.**

No comments

### **5c. What are your views on the evidence that would inform judgements about this aspect? You could include comments on issues such as:**

- **what evidence could demonstrate the requirements of condition B1 are met at a provider level**
- **whether the submission page limit should be reduced**

- **the proposed inclusion of indicators based on the ‘Learning opportunities’ theme of the National Student Survey (NSS).**

We do not think the length of neither the provider nor student submission should be reduced.

## **Proposal 6: A revised and integrated condition B3**

**6. Do you have any comments on our proposed approach to revising condition B3 and integrating the assessment of minimum required student outcomes into the future Teaching Excellence Framework (TEF)? You could include comments on areas such as:**

- **removing the progression indicator from condition B3**
- **how contextual factors would be considered at different stages in the process.**

No comments

## **Proposal 7: The student outcomes aspect**

**7a. What are your views on the proposed approach and initial ratings criteria for the student outcomes aspect?**

We feel there is a need for greater clarity on the weighting attached to contextual factors listed in clause 104. We know many of our alumni wish to remain in the Lancaster area and this has an impact on their potential income (clause 114). Similarly, we hope that due consideration will be given to the importance of discipline-level benchmarking, where an institution may deliver a wide range of disciplines (clause 113).

**7b. Do you have any comments on the proposed set of employment and further study indicators, and are there other measures that we should consider using?**

No comments

**7c. What are your views on the proposal to consider a limited set of contextual factors when reaching judgements about this aspect?**

Providers' contextual submissions are important to ensure assessments of quality are accurate and informed. In the current climate, with reference to franchised provision and institutional mergers, contextual information becomes even more important.

## **Proposal 8: Assessment and decision making**

**8a. What are your views on who should carry out the assessments? You could include suggestions for how we can enable more assessors (both academic and student) from small, specialist or college-based providers to take part.**

We feel it is important that student assessors retain a significant presence on TEF panels. We would strongly encourage the OfS to continue to enhance the training and support offered to all panel members, including student assessors.

**8b. What are your views on only permitting representations on provisional rating decisions of Bronze or Requires improvement?**

We feel all providers, regardless of assessed outcome, should be given the opportunity to challenge factual inaccuracies in their assessment (clause 137). A Silver rating would not be considered a good outcome for Lancaster, nor for similar high-ranking institutions.

## **Proposal 9: Varying the approach for providers with limited data**

**9a. What are your views on our proposal for an alternative means of gathering students' views to inform the student experience aspect where we do not have sufficient National Student Survey-based (NSS-based) indicators? You could include comments on:**

- the proposed approach to determining whether the NSS data is sufficient (this is expanded on in Annex G)
- the actions we are considering to improve the availability of NSS data for more providers
- how student views could be gathered through an alternative means.

We broadly agree with the approach outlined in Annex G. We welcome the split of providers' data detailed in clause 7, Annex G. We would have liked to have seen greater detail on thresholds for reportable data (clause 11, Annex G) as part of this consultation.

We have some concerns about the applicability of focus group data as a replacement for the NSS (clause 145). If undertaken, our expectation is that it would be delivered independently of the institution by appropriately qualified individuals.

**9b. What are your views on our proposal not to rate the student outcomes aspect where we do not have sufficient indicator data? You could include comments on the proposed approach to determining whether the data is sufficient (this is expanded on in Annex G).**

No comments.

## **Proposal 10: Student evidence and involvement**

**10a. What are your views on our proposed approach to including direct student input in the assessment of the student experience aspect for all providers? You could include comments on alternative ways of gathering student input where student submissions are impractical.**

We feel strongly that the opportunity for students, and more importantly organised student representative bodies, to communicate directly with the regulator must remain a core tenant of the TEF assessment process.

We would like to see the OfS provide more clarity on the assessment of situations in which an independent student submission is "challenging or impractical" (clause 160). It is our view that replacements should only be sought in the most extremely cases. In most instances, we would strongly encourage the OfS to work with small and specialist providers to appropriately resource student representative bodies, with the expressed intention of compliance with this aspect of TEF assessments. Our concern is that unscrupulous providers will use this clause to silence dissent from their student body.

Our preference would be that permission of alternative processes is judged by student assessors on TEF panels. We would strongly encourage the OfS to provide institutions with a list of measures they should have exhausted before undertaking commissioned focus groups. This should include adequate resourcing for new or existing student representative bodies. As outlined elsewhere in our response, we expect that focus

groups will be delivered by an independent body using appropriately qualified practitioners.

**10b. How could we help enable more student assessors from small, specialist and college-based providers to take part?**

The OfS should carefully consider the training and support offered to student assessors. Special consideration should be given to the utility of that training and support for student assessors with limited or narrow prior experience.

## **Proposal 11: Assessment cycle**

**11a. What are your views on our proposed approach to scheduling providers for their first assessments? You could include comments on:**

- **the factors we should consider in scheduling assessments**
- **any types of significant events that should lead us not to schedule an assessment in that year**
- **the sequencing of Teaching Excellence Framework (TEF) assessments and access and participation plan (APP) approvals.**

We would welcome any schedule that provides greater clarity and certainty, in the long-term, for providers.

For future iterations of the TEF, we ask that the OfS make a greater effort to provide clear timelines for student representatives. Similarly, we would welcome greater guidance for the authors of student submissions. TEF panels need to be overt about the expected content, level of detail, and tone of student submissions.

**11b. What are your views on our proposed approach to scheduling providers for subsequent assessments?**

We would welcome any schedule that provides greater clarity and certainty, in the long-term, for providers.

## **Proposal 12: Risk monitoring**



**12. Do you have any comments or evidence about the factors associated with risks to quality that might be included in the draft risk monitoring tool at Annex I?**

No comments.

### **Proposal 13: Incentives and interventions**

**13. Do you have any comments about the proposed set of incentives and interventions associated with Teaching Excellence Framework (TEF) ratings? You could include comments on:**

- the principle that growth in student recruitment should take place at high quality providers
- the potential to link eligibility for new degree awarding powers (DAPs) awards, or extensions to existing DAPs, to higher TEF ratings
- the approach to determining a breach or increased risk of breach, following TEF rating decisions
- whether there are any other incentives and interventions we should consider.

We would welcome transparency about the “some kinds of funding” available to institutions achieving Gold or Silver (Table 3). We believe that the OfS should be clear about the material incentives available for providers, transparent about the intentions behind these incentives, and proactive in supporting providers to seek real improvement in quality, not merely game the system for material reward.

### **Proposal 14: Published outputs**

**14a. What are your views on the range of quality assessment outputs and outcomes we propose to publish?**

No comments.

**14b. Do you have any comments on how we could improve the usefulness of published information for providers and students? You could include comments on areas such as:**

- **whether the OfS should have a role in sharing good practice, and how we should do so**
- **the presentation of Teaching Excellence Framework (TEF) outcomes for providers that are not rated for student outcomes.**

We would encourage the OfS to meaningfully converse with Students' Unions to best understand the resources required to train student representatives on their rights and the TEF outcomes of their institution.

## **Proposal 15: Implementation timeline**

### **15. Do you have any comments on the proposed implementation timeline?**

No comments.

### **16. Do you have any comments on the two options we have set out for how we could approach publication of Teaching Excellence Framework (TEF) ratings during the transitional period, or suggestions of other approaches we could take?**

No comments.

### **17. Do you have any comments on our approach to ongoing development, or our plans to prepare for the future inclusion of taught postgraduate provision?**

No comments.

## **Next steps**

### **18. Are there aspects of the proposals you found unclear? If so, please specify which, and tell us why.**

We would welcome greater clarity around the expectation that all providers support and appropriately resource student representative organisations to prepare a student submission. Though alternatives can be welcome, in the extremely small number of instances where necessary, the OfS should be clear in its expectations around meaningful student representation.

### **19. In your view, are there ways in which the objectives of this consultation could be delivered more efficiently or effectively than proposed here?**

No comments.