Consultation on a new approach to regulating student outcomes

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Are you responding on behalf of an individual or an organisation?
Organisation

What is the name of your organisation? (If not relevant, please answer 'N/A')
Engineering Professors' Council

Which of the following best describes you?
Other (please specify): HE engineering representative body

General questions regarding this consultation

Q1. Are there aspects of the proposals you found unclear? If so, please specify which, and tell us why.

1. It is unclear why, in these proposals, OfS would want to ignore the context of students' learning in terms of their prior attainment, and the strategic mission of providers to support access to and participation in HE. These are fundamental to the sector's mission and its capacity to address disadvantage based on factors beyond the control of either the student or provider. The approach outlined renders the heavy lifting of 'taking steps to meet the needs of students from underrepresented groups where those needs are different from other students' needs' the responsibility of those choosing to 'do the right thing', while others with the capacity to do so simply perpetuate advantage. Recognising the reality of socioeconomic challenges is not the same as complacently accepting differential outcomes as has been asserted. Rather it is the only way to overcome such differences.

2. It is unclear how these proposals realistically address the current context, in particular the unevenly distributed effects of the pandemic. Widely evidenced amplification of disadvantage will be baked in through this approach. It is unrealistic to ignore pre-HE 'gaps'. With entry tariff (prior attainment) dismissed as irrelevant, creaming is inevitable. Meanwhile, providers who currently make the greatest contribution to disadvantaged students' recovery risk being penalised for their efforts. There is also no validity to the claim that KS5 results are not an equitable proxy for potential at a time when students' pre-HE education has been compromised to the point of Centre Assessed Grades.

3. It is unclear how these proposals square with Government proposals regarding stackable higher education, the evolving Higher Technical Qualifications landscape and the Lifelong Loan Entitlement. The Government has now set out a clear direction of travel in its proposed reforms to the post-18 education landscape in response to the Augar Review; it appears that transformation of HE to a hop-on-hop-off ecosystem in the context of the Lifelong Loan Entitlement (LLE) is entirely at odds with the approach outlined here.

Q2. In your view, are there ways in which the objectives of this consultation (as set out in paragraph 7) could be delivered more efficiently or effectively than proposed here?

4. A one-size-fits-all model is not fit for the diverse HE sector our students enjoy today and most certainly not applicable to the Government's direction of travel with regard to stackable credentials and lifelong learning. The use of simplistic numeric baselines has long been deployed in the sector as a shorthand to support – not guide – decision-making (for example, A level points, tariff scores, internal course reviews) but has never been universally adopted due to the heterogeneity of both providers and students.

5. The OfS should adopt criteria for success that better recognise the distance travelled in terms of achievement for students who reach degree standard from a lower base of prior attainment and in the face of greater challenges. The only useful baseline on quality is whether sufficient added value has been delivered; that you've learned enough to be awarded a degree despite inequalities, not because of them. It is EPC's clear view that anything else will do more harm than good. We recommend developing progress measures that appraise skills on entry to higher education, and reassessment at the end. This would both quantify learning gain and help to identify gaps in understanding at a personal level to support a lifelong learning approach. A focus on outcome based on anything other than individual student potential is at odds with the entire preceding UK education system.

6. In no way does a context-based assessment of learning gained and value-added excuse outcomes that are below the potential of the student because the outcomes selected for measurement are not a direct result of the educational provision whereas learning gain is. In other words, outcomes are at best a proxy measure of the education that has been delivered whereas learning gain is a direct measure. The use of a proxy means that outcomes are valued over education. Rather than tackling inadequate HE provision, it creates an excuse for poor quality education to be delivered by admitting students with pre-existing high outcomes potential.

7. The EPC would welcome an approach which makes better use of existing regulation frameworks (such as Ofsted in relation to degree apprenticeships and accreditation in relation to professional courses), where on the ground evidence of high quality is recognised as a positive indicator without deferring to deficit model proxy measures. Dismissal of sensible and established regulatory and professional outcomes which already hold providers to account, at subject level, will lead to over-regulation of the highest quality courses in the sector. OfS's approach is a concern in relation to regulation hierarchy; burden on providers to provide such additional information in unstructured context statements, specifically for high-cost subjects; workload and impact on students; and – in engineering especially – the onward impact of international standing.
8. The proposed approach conflicts with Government policies, including on HE funding, degree apprenticeships, international student targets and lifelong learning. That may mean the opposing incentives somehow serendipitously resolve into a happy compromise, but it is more likely to mean that all such efforts to create incentives will be a waste of resources as HEIs are pulled in multiple directions simultaneously.

Questions relating to Proposal 1: Revising condition B3 and associated guidance in the regulatory framework

Q3. Do you agree or disagree that the proposed wording of condition B3 will enable the OfS to meet its policy objectives? If you disagree, what changes do you think are necessary to do so?

Disagree

Comments:
9. There is a vast literature on the structural barriers experienced by disadvantaged learners throughout their education. By explicitly rendering universities accountable for addressing the failings of education pre-higher education, OfS will encourage higher education providers to avoid selecting students with lower prior attainment or any other circumstances that might hamper their employment outcomes (such as socioeconomic disadvantage, ethnicity, gender, disability, etc.). The effect will obviously be the opposite, undermining OfS's legal duty to promote fair access.

10. The approach as it stands is likely to encourage risk-averse admissions policies, effectively raising the bar for any students that diverge from those who have been successful in the past. This will likely close down opportunities and make higher education increasingly the preserve of those whose pre-existing privilege is the most ingrained while marginalising those for whom the transformative potential of higher education is greatest. Universities will be incentivised by these proposals not only to recruit those who are less likely to drop out and more likely to 'succeed' in the graduate labour market, but they will also face potentially severe penalties for doing anything other than that.

11. The proposed amendment to condition B3 requires a provider to deliver positive outcomes for students on its higher education courses expressed in terms of performance against narrow proxy measures for positive outcomes. Universities' strategies and behaviours are influenced by the metrics by which they are judged and the consequences attached to those judgements. If they weren't, there would be no point in them.

12. The increased emphasis on continuation and progression measures will create downward pressure on quality, in direct opposition to OfS stated goals. By penalising courses and institutions for 'drop-out' (which is predominantly a result of factors extraneous to the students' studies, see M. Yorke, Leaving Early (1999)), courses will be under increased pressure to limit drop-out through factors that are within their control, namely the extent to which they fail students who are not reaching the required standards. No provider is likely to do this deliberately, but it will be an emergent effect of seeking to ensure that students are given every opportunity to progress and given no reason to drop out. In engineering this pressure will conflict with existing regulator quality standards and put engineering departments in a very difficult position in relation to regulations arounds compensation and condonement of modules driven by international expectations under the Washington and Sydney Accords.

13. Similarly, the focus on employment outcomes may encourage unjustified grade inflation as a First or Upper Second class degree is commonly regarded as a signifier to employers of high performance. Providers will be reluctant to use the full range of assessments at their disposal for fear of undermining the employment prospects of their graduates which may present an existential threat to courses or even whole institutions.

Both these downward effects on quality would be avoided by use of learning gain as a measure of educational standards rather than proxies.

14. By recognising only the 'exchange value of HE' – that is the development of skills and knowledge in order to pass the required assessments and gain a 'qualification' that will allow the individual to access career choices that are not possible without this qualification – the OfS reject the other aims of HE including:

Q3. Do you agree or disagree that the proposed wording of condition B3 will enable the OfS to meet its policy objectives? If you disagree, what changes do you think are necessary to do so?

● use value: the development of skills and knowledge for use in employment and everyday life;
● self- actualisation: the benefits for mental and spiritual well-being given to an individual when they are able to reach their full potential;
● education of the next generation: by educating one generation, we are providing the generations to come with a support-network better able to nurture their educational needs. The critical role played by the family in supporting education has never been more clear as during the pandemic where parents and guardians have been expected to home-school.

This leads to a distortion of education where “teaching to the test” becomes the norm; this also leads students to view their educational experience as transactional rather than the rich transcendent experience that it should be. In turn, this generates a labour force that does not reflect the requirements of employers; life-long learners who are driven to deliver their best every day and who have the flexible skills to adapt to ever-changing labour market needs.

Questions relating to Proposal 2: Constructing indicators to assess student outcomes

Q4. Do you agree or disagree with the proposals for how we will construct a student outcome measures? Do you have any alternative suggestions?

Disagree

Comments:
15. The policy objective is to ensure students from all backgrounds are protected from unacceptably weak outcomes, but efforts to ensure diversity within the student population will be totally undermined by effectively raising the bar for any students that diverge from those who have been successful in the past. It does not raise standards for those who no longer have the opportunity to access those courses.

16. Under these proposals, efforts to achieve a better gender balance in Engineering would be disincentivised. Addressing inequality and increasing diversity is a critical issue for the engineering community. There is a sizeable and well-documented engineering skills gap that poses a significant risk to the UK economy and is already believed to be hampering productivity and growth. This gap would be closed if the engineering labour force were expanded to be demographically representative of the society it serves. The latest HESA data shows that only 23.7% of engineering undergraduate students in 2020/21 were female. Many more engineers are men and LEO data shows that men do better in the workplace (continuing the OfS narrative that graduate success is best measured economically). This difference is a function of structural inequalities in society rather than an innate gender difference in employability, and it persists despite female Engineering students achieving slightly better results in their degrees. EPC research suggests that gender-based inequalities mean that the benefits of social mobility through employment that an Engineering degree may confer will be experienced more fully by men. By incentivising institutions to seek to recruit the most employable students, these proposals will exacerbate, not address the under-representation of women, further embedding inequality in society.

17. The same pattern will be true for a host of protected and unprotected characteristics in Engineering and across all subjects: employment outcomes are less favourable for people from ethnic minorities, people with disabilities, those from disadvantaged backgrounds, those choosing to live in less prosperous parts of the country, and those entering the graduate labour market later in life. These proposals will create a direct reason not to recruit students who fall into one or more of these categories and the most selective institutions will be able to exercise this discrimination most freely.

18. In engineering, these pressures may also trigger the re-introduction of the traditional Maths and Physics A level prerequisite, undoing years of work to improve access and diversity, particularly in universities adopting new approaches to engineering education and those disrupting the traditional model of engineering education under which the current inequalities have formed.

19. Learning diversity in engineering is empirically under-reported, where SEND teaching approaches are commonly applied even when there is no diagnosis or specific learning need. Innovative approaches to teaching and learning serve diverse needs and a diverse body of students, serving diverse societal, economic and labour market needs and is often cited as a contributing factor to the UK's high-quality HE sector. OfS should use its position and powers to encourage innovation rather than incentivise homogenous approaches designed to deliver metric-satisfying outcomes.

20. Institutional autonomy allows and encourages innovative approaches, driving quality and adaptation to an ever-changing world. This is particularly important in Engineering, facilitating innovation and diversity. The risk of an if-it-ain't-broke-don't- try-to-fix-it / copy-whatever-works-for-someone-else / perpetuate-what-always-used-to-work approach is a threat to engineering education, the economy and society as a whole. That is not to say that institutional autonomy is inherently in opposition to the work of a regulator. We accept the purpose for regulation which is why we propose that the regulator adopts proposals that encourage high-quality and innovation (such as using learning gain as a baseline).

Q4. Do you agree or disagree with the proposals for how we will construct a student outcome measures? Do you have any alternative suggestions?

21. The proposed amendment to condition B3 requires a provider to deliver positive outcomes for students on its higher education courses expressed in terms of performance against narrow proxy measures for positive outcomes. Defining 'positive outcome' in terms of 'the proportion of students progressing to managerial or professional employment, or further study' fails to address the concerns raised by EPC and others that, while employment is a critical purpose of higher education, it is not the only one for either the individual or for society. The quality of someone's education is not directly related to their subsequent employment status. Employment outcomes are only indirectly related to factors within the universities' control such as the quality of teaching and support. This approach supports out-of-date thinking around measuring success through high-achieving entrants going on to largely elitist jobs. It ignores the value of higher education in improving social mobility, developing local economies, serving the public good or even merely as personal self-actualisation.

22. The proposals fail to capture comprehensive or representative data on international students or UK students that end up working overseas. We note that HESA does not intend to collect responses to the Graduate Outcomes survey from international students by telephone in future, which is likely to reduce the response rates among this group significantly. The partial exclusion of international students from metrics is likely to lead to an incomplete and potentially inconsistent picture, while the employability of engineering students on a global stage will lead to underrepresentation of performance. Approximately one in four students is international in Engineering; a higher proportion than in almost any other discipline.

23. The only useful baseline on quality is the value added; that students have learned enough to get a degree, despite inequalities not because of them. It is EPC's clear view that anything else will do more harm than good. The OfS should adopt criteria for success that better recognise the distance travelled in terms of achievement for students who reach degree standard from a lower base of prior attainment and in the face of greater challenges. We recommend developing progress measures that appraise skills on entry to higher education and reassessment at the end. This would help to identify gaps in understanding and quantify learning gain.

24. In order to promote the 'levelling up' of deprived communities, the criteria must also recognise geographic variability and not create metric incentives that mean that social mobility is recognised only when graduates move away from communities that need their skills and innovation. No university based in a low employment area and recruiting local students should be metrically punished because its graduates do not move away.

25. As well as abandoning harmful metric approaches, regulators and government should seek to provide better alternatives by developing commonly used indicators that recognise social mobility and which can track progress through schools, colleges, higher education and into the labour market. To this end, particularly in the context of Engineering, there will need to be a better understanding – and probably a looser definition – of what constitutes a 'graduate role' (identified by the role holder, for example).

Questions relating to Proposal 3: Setting numerical thresholds for student outcome indicators

Q5. Do you agree or disagree with our proposed approach to setting numerical thresholds set out in Annex E? If you disagree, please provide reasons and any alternative suggestions.

Disagree

Comments:
26. The use of numeric thresholds is consistent with components of shorthand approaches already deployed by some EPC members for ease of university processing in determining successful achievement of an acquired learning outcome. In this context, numerical thresholds, while helpful, inform an assessment against learning outcomes but they are not the key component. As tabled in our response to other questions, we regret that the OfS proposals do not relate to a tangible outcome of an achievement made by the student.

27. Under this approach, universities will be disincentivised to let anyone fail, leave or even repeat a year. Instead, everyone will pass (grade inflation) and students who have lost enthusiasm for their course will be 'conveyor-belted' through rather than allowed to drop out.

28. Engineering is heavily regulated: in any accredited Engineering course there is already a clearly defined set of standards, governed by the Engineering Council and assured by Professional Engineering Institutions. Indeed, PSRBs already set standards in terms of learning outcomes in Engineering (and many other professional higher education courses). Accreditation standards are high, but if meeting accreditation standards threaten performance metrics, universities may opt not to be accredited rather than risk letting students fail or drop out. This is a threat to standards. The proxy measures proposed are highly influenced by industrial imbalances in recruitment practices (gender, socio-economic background, etc).

29. The outcomes baselines do not adequately consider that these measures are highly influenced by region, by industrial sector and by imbalances in recruitment practices (gender, socio-economic background, etc.). Outcomes will always be the product of the health of the wider economy in the context of regional, national and global market forces that are far beyond the control of the sector. We note that factors outside a provider's control inform the historical performance aspect of the context submission, but with recession, pandemic and recovery accounting for most of the past decade and a half and accepting that employment measures for the next few years may be wildly unrepresentative of actual standards or performance over time, this suggests that the entire exercise will, for the foreseeable future, be a flawed attempt to extract a significant signal (at several simultaneous levels of granularity) from statistical noise. That is again a by-product of using indirect measures of quality rather than attempting to measure learning gain.

Q6. Do you agree or disagree with the proposed numerical thresholds set out in summary in Table 1 and shown in full in “Setting numerical thresholds for condition B3”?

Disagree

Comments:
30. The approach would benefit from a regional appraisal and nuance to prevent local brain drains and enforced geographic mobility. Local retention / employment is not only a positive outcome for graduates, but also a really positive choice for the Government’s goal of levelling up regions by creating high-skilled employment in disadvantaged areas. Given regional variations in the labour market, the goal of regional development through educating and upskilling the local workforce is inconsistent with the desirable outcomes as set out in the strategy as it stands. It should not fall to universities to resource consultants to outline regional priorities to a government regulator.

Moreover, if other incentives are put in place (by Government or other bodies) to encourage HEIs to focus on supporting Levelling Up missions, those may be at odds with the outcomes that OfS hopes to incentivise. That may mean the opposing incentives serendipitously resolve into a happy compromise, but it is more likely to mean that all such efforts to create incentives will be a waste of resources as HEIs are pulled in multiple directions simultaneously.

31. We recommend that employment outcome data should always be regionally benchmarked. By using data that does not recognise learning gain or geographic variability, the regulators and Government effectively ensure that these proxy measures of quality are misleadingly heuristic. It also encourages the use of these heuristics in league tables and giving applicants a simplistic signal about what constitutes a ‘good’ university or course. This actively undermines progress in promoting social mobility.
The value of higher education in improving social mobility, developing local economies, and “levelling up” – especially post-pandemic – is in addressing the precise inequalities that these proposals ignore. Under these proposals, institutions where graduates supply workplaces in disadvantaged parts of the country will be in the bottom third of the table for employment and will be at risk of being fined. It’s been pointed out that the best thing a university like Sunderland could do is relocate to London.

Questions relating to Proposal 4: Publishing information about the performance of providers in relation to the OfS’s numerical thresholds

Q7. Do you agree or disagree with our proposal to publish information about individual providers' student outcomes and performance in relation to our numerical thresholds, as well as sector-wide data, on our website?

Don't know

Comments:
32. We are cautious about the wide 'marketing' of apparently negative metrics and the impact on the international market. Higher education in the UK is perceived internationally as among the best provision in the world. Competition between institutions for students (both home and international) and existing performance controls have served students well. We fear that the proposed deficit model may, indeed, be permanently damaging to the UK's elite international reputation.

33. We note that the numeric thresholds will permit and even encourage cross-comparison between institutions. With this in mind, together with the proposed display of data in relation to the baseline and statistical certainty, we wonder what – if any – value the TEF may add to student choice.

34. On this basis, we would seek publication by subject at a more granular level, particularly as there is no longer a subject subset to the TEF proposals. Evidence suggests that students select subject above provider.

Questions relating to Proposal 5: Making judgments about compliance with condition B3, including consideration of context

Q8. Do you agree or disagree with the proposed approach to assessment set out in Annex F? Is there anything we could do to improve the clarity of this information for providers?

Don't know

Q9. Do you agree or disagree with our proposed general approach to prioritisation? If you disagree, do you have any alternative suggestions for how we should approach prioritisation?

Disagree

Comments:
35. The mission and strategy of providers to support access to and participation in HE are fundamental to the sector's mission and its capacity to address disadvantage based on factors beyond the control of either the student or provider. This approach renders the heavy lifting of 'taking steps to meet the needs of students from underrepresented groups where those needs are different from other students' needs' the responsibility of those choosing to 'do the right thing', while others with the capacity to do so simply perpetuate advantage.

36. Engineering is heavily regulated: in any accredited engineering course there is already a very clearly defined set of standards, governed by the Engineering Council and assured by Professional Engineering Institutions. Indeed, PSRBs already set standards in terms of learning outcomes in engineering (and many other professional higher education courses). Accreditation standards are high, but if meeting accreditation standards threatens performance metrics, universities may opt not to be accredited rather than risk letting students fail or drop out. This is a threat to standards.

37. The EPC would welcome an approach which makes better use of existing regulation frameworks (such as Ofsted in relation to degree apprenticeships and accreditation in relation to professional courses), where on the ground evidence of high quality is recognised as a positive indicator without deferring to deficit model proxy measures. Dismissal of sensible and established regulatory and professional outcomes which already hold providers to account, at subject level, will lead to over-regulation of the highest quality courses in the sector. OfS's approach is a concern in relation to regulation hierarchy; burden on providers to provide such additional information in unstructured context statements, specifically for high-cost subjects; workload and impact on students; and – in engineering especially – the onward impact of international standing.

Q10. Do you think that the OfS should adopt Option 1 or Option 2 (see paragraphs 207) when defining the scope of each assessment for ongoing condition B3?

Neither.

Q11. Do you agree or disagree with our proposals for considering the context of an individual provider when assessing compliance with condition B3?

Disagree

Comments:
38. It should not fall to universities to resource consultants to outline educational and regional priorities to a regulator, nor to repeat legally binding and defensible judgements or professional outcomes under sensible regulatory frameworks.

39. Employment outcomes are only indirectly related to factors within the universities' control such as the quality of teaching and support. The outcomes baselines do not adequately consider that these measures are highly influenced by region, by industrial sector and by imbalances in recruitment practices (gender, socio-economic background, etc.). Outcomes will always be the product of the health of the economy in the context of regional, national and global market forces that are far beyond the control of the sector. We note that factors outside a provider's control inform the historical performance aspect of the context submission, but with recession, pandemic and recovery accounting for most of the past decade and a half and accepting that employment measures for the next few years may be wildly unrepresentative of actual standards or performance over time, this suggests that the entire exercise will, for the foreseeable future, be a flawed attempt to extract a significant signal (at several simultaneous levels of granularity) from statistical noise. That is again a by-product of using indirect measures of quality rather than attempting to measure learning gain.

40. The value of higher education in improving social mobility, developing local economies, and "levelling up" – especially post-pandemic – is in addressing the precise inequalities that these proposals ignore. Under these proposals, institutions where graduates supply workplaces in disadvantaged parts of the country will be in the bottom third of the table for employment and be at risk of being fined. It's been pointed out that the best thing a university like Sunderland could do is relocate to London.

41. The approach would benefit from a regional appraisal and nuance to prevent local brain drains and enforced geographic mobility. Local retention / employment is not only a positive outcome for graduates, but also a really positive choice for the Government's goal of levelling up regions by creating high-skilled employment in disadvantaged areas. Given regional variations in the labour market, the goal of regional development through educating and upskilling the local workforce is inconsistent with the desirable outcomes as set out in the strategy as it stands.

Questions relating to Proposal 6: How the OfS will address statistical uncertainty in the assessment of condition B3

Q12. Do you agree or disagree with the proposed approach to using statistical measures when considering a provider's performance in relation to numerical thresholds?

Don't know

Comments:
42. However, we note that there are a growing number of specialist engineering providers, where data for student cohorts of fewer than 23 will be suppressed, particularly at split indicator level.

43. Typically, the proposed statistical uncertainty approach in this context relates to the size of the student population, where smaller numbers can lead to greater uncertainty. We therefore note that these proposals may have a specific impact on such "non-standard" provision, potentially deterring future partnerships, limiting student choice, and disproportionately impacting upon these smaller, specialist providers.

Q13. Do you have any suggestions for additional steps the OfS could take to provide greater clarity about the impact that the proposed approach to statistical confidence may have for individual providers?

No.

Questions relating to Proposal 7: Taking regulatory intervention when a breach is identified

Q14. Do you agree or disagree with our proposals to impose an 'improvement notice' where we find a breach of condition B3?

Disagree

Comments:
44. OfS's proposals are based on the assumption that factors beyond a provider's control are not so extensive that the needs of students from underrepresented groups where those needs are different from other students' needs can't be mitigated by taking appropriate steps. We disagree and believe that a breach of condition B3 as proposed is likely to occur within those providers, regions and sectors who most closely engage with those cohorts for whom the transformative potential of higher education is the greatest.

45. We are concerned that, through this approach, universities will be disincentivised to let anyone fail, leave or even repeat a year. Instead, everyone will pass (grade inflation) and students who have lost enthusiasm for their course will be 'conveyor-belted' through rather than allowed to drop out. The interest of the student should always be paramount. In some instances, non-completion can be a positive outcome for the student if partial study was enough for career progression and/or salary increase or in fulfilling an employability need.

46. In the context of its reforms to the post-18 education landscape and the promised Lifelong Loan Entitlement (LLE), the Government's has expressed its explicit intention to move swiftly to a more flexible model of higher education with a stackable hop-on-hop-off system of courses and modules. The concept of non-continuation and non-progression with become harder to define if not lose their meaning entirely. We would strongly counsel against introducing a system that relies heavily on notions that may be on the brink of becoming obsolete.

It is also worth noting that, by comparison, drop-out rates in English higher education institutions are among the lowest in the world. However, that is not necessarily an indicator of quality, since most countries already have systems of recognition for partial completion of a higher education qualification, which is often regarded as positive rather than a failure worse than never embarking on a higher education course in the first place.

47. We note that universities are likely to see that Engineering has a positive effect on their indicators overall, which is unsurprising given that it has high cost to deliver. However, these proposals are specifically clearly a threat to the arts, and subjects where there are no PSRBs which is a problem for the sector which is sustained only through heavy cross-subsidisation. As a result, incentives intended to encourage HEIs to focus more on subjects with positive outcomes (in OfS's terms) may inadvertently harm them as these courses will not be cost-effective to run at larger scale without also scaling up courses with lower costs.

Q15. Do you agree or disagree with our proposals to take account of a provider's compliance history in relation to condition B3 for the purpose of determining eligibility for other benefits of OfS registration?

Disagree

Comments:
48. The EPC would urge OfS to ensure that specialist Engineering providers and providers offering non-traditional models of Engineering HE remain TEF eligible. As already discussed, these serve distinct and important societal and economic purposes not necessarily appropriately measured by these proposals.

49. We note that such proposals might risk duplication with other existing frameworks unless they are replaced totally with this. Total replacement would amplify our earlier concerns.

Questions relating to Proposal 8: Timing of implementation

Q16. Do you agree or disagree with the proposals for the implementation of the proposed approach to regulating student outcomes? If you disagree, do you have suggestions for an alternative timeline?

Disagree

Comments:
50. In short, it seems hasty to implement the proposals at such short notice, especially in light of the Government's proposed reforms to the post-18 education landscape and the promised the Lifelong Loan Entitlement (LLE) announced during the consultation window for this work. Any changes made are likely to need to be revisited before they have even had an opportunity to be fully implemented.

Question relating to considering regulatory burden on registered providers

Q17. Is there anything else we could consider that would reduce regulatory burden for providers while regulating minimum requirements for student outcomes?

51. With HE planners able to pore over a host of split indicators, the volume of data required to hunt the outliers to improve progression rates – together with the complexity of internal analysis of split indicators by other split indicators (i.e. subject by sex and domicile) – could reasonably be such that the resource to understand the student factors affecting underperformance is greater than the benefit. Why bother when the known ‘problem areas’ (i.e. courses in the arts and any students that diverge from those who have been successful in the past) can simply be cut off at source? Even without such a sweeping approach, without the ability of adequate targeting, providers will have little choice but to use a sledgehammer to crack a walnut; a disaster for diversity.