Department for Education

Securing student success: risk-based regulation for teaching excellence, social mobility and informed choice in higher education

Government consultation response

February 2018

Contents

Introduction

The government set out its plans for the regulation of higher education, including a new Office for Students (OfS), in its white paper, 'Success as a Knowledge Economy: Teaching Excellence, Social Mobility and Student Choice' (May 2016).

The Higher Education and Research Act 2017 (HERA), which received Royal Assent on 27 April 2017, creates the new regulator (the OfS) and the new regulatory system. Key aims are to deliver greater competition and choice, promote social mobility, boost productivity in the economy, and ensure students and taxpayers are getting value-for-money and strong outcomes from higher education. The reforms will help to ensure that everyone with the potential to benefit from higher education, irrespective of their background, will be able to choose from a wide range of high quality higher education providers ('providers'), access relevant information to help them make the right choices, and experience excellent teaching that supports their productivity and prepares them well for the future. By introducing more competition and choice into higher education, we will deliver better value for money for students, employers and the taxpayers who underwrite the system. By introducing a risk-based system which is focused on outcomes, the OfS will be able to hold providers who are not delivering strongly to account.

In order to meet requirements set out in HERA, or commitments made through its passage, the Department for Education (DfE), on behalf of the OfS, launched a consultation in October 2017. This consultation sought views on the regulatory system from a wide range of respondents, including students, providers and their representative bodies, as well as others such as employers, charities and research bodies.[1] The consultation covered the proposed OfS regulatory framework, including its initial and ongoing registration conditions, and set out the context for the creation of the OfS and its overall regulatory approach.[2]

Now that the OfS is in existence, it is able to treat this consultation as its own and take into account the consultation responses in finalising its regulatory framework.[3] Reflecting the 'hand-over' from DfE to the OfS, DfE is publishing this factual summary of the consultation responses, alongside the OfS's publication of its own substantive narrative response to the consultation and its final regulatory framework. These will be accompanied by the OfS's publication of the initial and general ongoing registration conditions.

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[1] Prior to the OfS being formally established on 1 January 2018.

[2] The consultation was designed to meet the consultation requirements set out in sections 5, 14 and 75 of HERA, and commitments made during its passage through Parliament.

[3] Under section 118(3) of HERA.

In addition, while the consultation was primarily on behalf of the OfS, DfE also used it to seek views on two other matters ahead of the Secretary of State making a decision on guidance or secondary legislation:

- amending the student support regulations to remove or amend the eligibility for two types of courses
- matters relating to the OfS becoming Principal Regulator for exempt charities.

This document contains DfE's substantive response to the consultation on these points as well as a purely factual summary of the responses.

There were also a number of other consultations relating to the higher education reforms over the same or overlapping time-frames. Responses are being published separately, and can be found at:

- [Securing student success: risk-based regulation for teaching excellence, social mobility and informed choice in higher education](#)

- [Office for Students: registration fees (stage 2)](#)

- [Designation of a body for English higher education information](#)

- [Designation of a body to perform the assessment functions for higher education in England](#)

- [Market access: degree awarding powers and university title](#)

Engaging respondents

In the consultation, we asked respondents a series of questions on particular policy proposals. Respondents could answer the questions digitally via the online survey or through written responses sent through to us via email or post. As well as receiving written responses, we also received correspondence on particular matters covered by the consultation, including electoral registration, which were considered as part of policy development.

When the consultation was initially launched, the OfS Chief Executive Nicola Dandridge wrote to all providers, encouraging them to read the consultation and give their views. DfE officials also contacted sector bodies and mission groups and asked them to publicise the consultation among their contacts and members. This was followed up by a series of meetings with key sector bodies and mission groups, to explore the consultation proposals in detail. In terms of engaging students, Nicola Dandridge visited a range of providers and met with students and students' unions, encouraging them to get involved in the consultation and to share their views about what the OfS should be focusing on. This engagement was supplemented by individual meetings with students' union representatives and staff. Feedback was passed to officials to consider when analysing consultation responses.

While the consultation was open, DfE held a number of events jointly with the then shadow OfS to explore consultation policies and proposals in greater detail with stakeholders including providers, students and their representative bodies. Five events took place, hosted by Birmingham University, London Institute of Banking and Finance (two sessions), Bournemouth University, and Manchester Metropolitan University. Vice-Chancellors and Chief Executives from all higher education providers across England, including Higher Education Institutions (HEIs), alternative providers and further education colleges (FECs), were invited and asked to send representatives to encourage diversity of views. The events were very well attended by a good cross-section of providers, their student representatives and supporting organisations, with over 260 attendees in total. The discussions informed our analysis and policy development, in conjunction with the responses submitted formally.

The following report is a factual summary of the responses we received and the feedback raised during the engagement outlined above. The tables reflect the quantitative answers we received in the 297 digital responses, where respondents formally indicated their strength of agreement or disagreement, while the written summaries reflect all comments and feedback raised across these responses, other written responses and the range of engagement outlined above.

Responses

Opening questions

We invited the respondents to provide their names, organisation and location.

The table below provides a breakdown of the organisation types that responded.

Organisation type	Total	%
Student representatives (including individual students)	46	15.5%
HEFCE-funded providers ("HEIs")	103	34.7%
Alternative higher education providers	59	19.9%
Further education colleges	28	9.4%
Other (all responses not covered in the above)	61	20.5%
Total	**297**	

Respondents were provided with a number of options to describe their status. For analysis purposes, these respondent types were grouped in the following way:

Student Representatives:

- Body representing students in higher education
- Student in higher education
- Prospective student

HEIs:

- Publically funded higher education provider

Alternative higher education providers

- Alternative higher education provider (with designated courses)
- Alternative higher education provider (no designated courses)

Further education colleges

- Further education college

Other:

- Representative organisation, business, or trade body
- Central/local government, agency or body

- Individual (non-student)
- Legal representative
- Trade union or staff association
- Charity or social enterprise
- Other (please state)

Question 1 - Do you agree or disagree that these are the right risks for the OfS to prioritise?
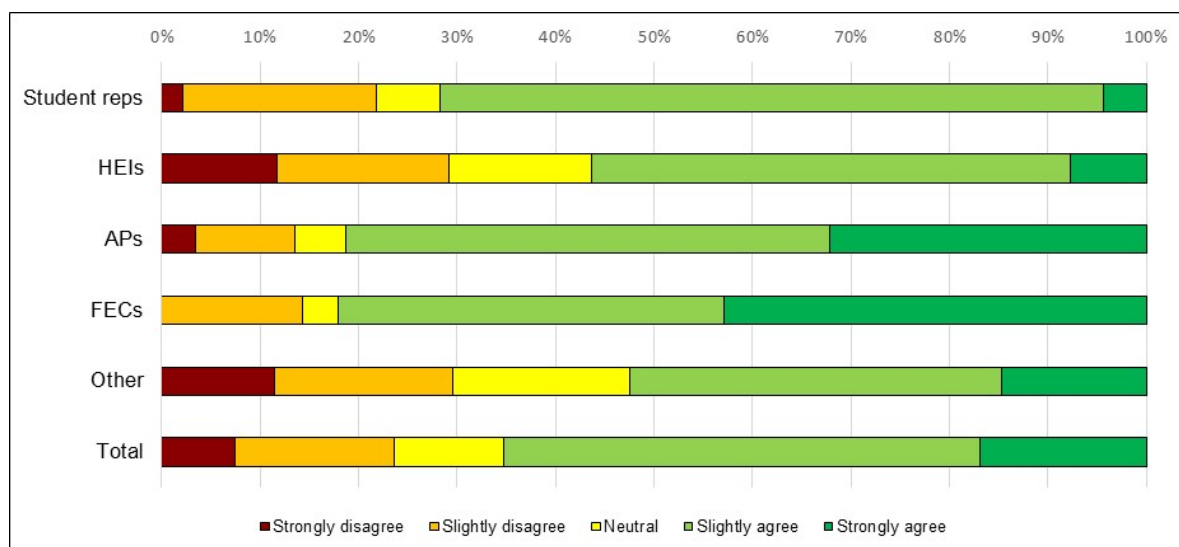
Response	Total	Percent
Strongly disagree	22	7.4%
Slightly disagree	48	16.2%
Neutral	33	11.1%
Slightly agree	144	48.5%
Strongly agree	50	16.8%
Total	**297**	**100%**

Respondents generally agreed with the proposed objectives and associated risks, and the student focus. Some respondents proposed additional areas for the OfS to prioritise or include in its objectives. Of these suggestions, those with the widest degree of support, particularly from representative groups of providers and from providers directly, were the protection of diversity of provision, institutional autonomy, and the reputation of the higher education sector.

Student representative bodies, including the NUS, argued for the current objectives to be clarified or extended, including extending the quality objective beyond academic quality and the consumer objective to cover students' other roles such as co-production (where students are involved in suggesting course content, structure or delivery modes, thereby playing an active part in shaping their academic experience). Some student bodies also called for the value for money objective to be clarified and linked more closely with students' views on value for money, while some bodies also argued that value for money was given too much priority in the consultation.

Some respondents also used this question to raise specific concerns around the conditions, such as a view that the senior staff remuneration condition might threaten institutional autonomy.

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 else might it be appropriate to take a more risk-based approach?

NOTE: There were no metrics captured for this question in the consultation – qualitative responses only.

Responses to this question generated a wide range of issues and views.

A number of concerns were raised around the appropriate use of indicators, data and benchmarks in relation to assessing whether the access and participation plan condition was being met.

Respondents suggested that the OfS could, for example, consider indicators such as free school meals and indices of multiple deprivation. There were calls for a single measure of disadvantage across higher education, further education and schools.

There were also comments about the benchmarks currently used to monitor access and participation activity, with some respondents commenting that these were not fit for purpose. Some respondents argued for benchmarks to be tailored to the provider and mode of provision.

There were calls for the continuing need to recognise the diversity of the sector in relation to access and participation, particularly the size of the provider and/or its specialist provision.

A number of respondents commented that access and participation activities were not risk-free and that greater activity in one area may lead to conflict with other outcomes, and potentially higher non-continuation rates were mentioned. Linked to this respondents raised the potentially negative consequences of focusing only on absolute performance (under condition B3) and that providers recruiting inclusive populations could as a result be seen as riskier. This might then act as a disincentive to progress on access and participation.

Many responses said they expected, and would value, the OfS continuing the Office for Fair Access (OFFA) role in identifying and disseminating good practice and in encouraging collaboration through but not limited to the National Collaborative Outreach Programme. A number of responses, particularly from students' unions, suggested that the OfS should, as a priority, look at the gaps in differential attainment (particularly for black students) as part of a long-term strategy.

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?
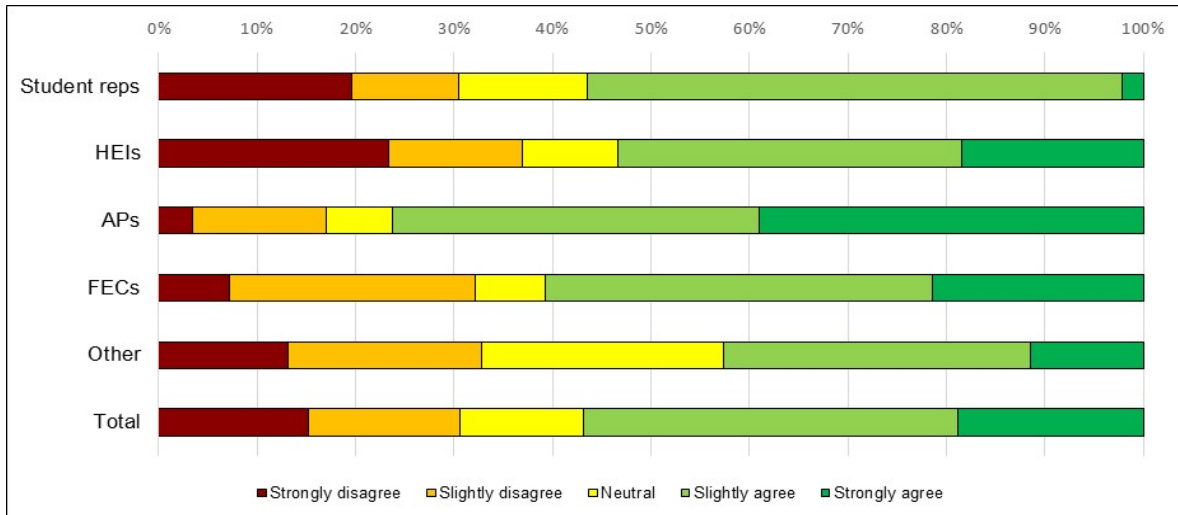
Response	Total	Percent
Strongly disagree	45	15.2%
Slightly disagree	46	15.5%
Neutral	37	12.5%
Slightly agree	113	38.0%
Strongly agree	56	18.9%
Total	**297**	**100%**

Overall, there was clear agreement by more than half of respondents that the OfS should operate a quality review system that focuses on outcomes themselves rather than how those outcomes are achieved. Providers cited that a focus on outcomes encourages innovation in delivery and provider models, leading to greater diversity of specialist providers, with models tailored to meet the needs of specific sectors and industries, and

to better support the interests of students as well as other stakeholders. However, some respondents raised concerns that the proposals were too reliant on a narrow set of outcomes data, and that process (how outcomes are achieved) should also be taken into account.

Within the detail of the responses, the most significant theme raised, particularly by providers and student bodies, was in relation to student engagement and student experience/voice to ensure that the views of students are taken into account. Where this was raised respondents took the position that successful outcomes are the product of `co-production' between students and providers, and that it is therefore important that the regulatory framework makes it mandatory that students be given the opportunity to be involved in the development, assurance, and enhancement of their courses.

However, a number of respondents argued that the regulatory framework should go further than focusing on the quality of the academic experience, to include the institutional environment and services, and that providers should be held to account for any issues highlighted in the National Student Survey and/or from direct feedback from students and students' unions.

The role of students in quality assessment was raised in particular by student bodies. Their view was that the regulatory framework should provide an annual opportunity for students to feed into the OfS or DQB on the student experience (both academic and wider) and for it to be a requirement that students be involved in any DQB assessment of quality or standards.

From some providers and student bodies, there was a challenge to the OfS to place a requirement on providers to demonstrate 'continuous improvement' in relation to quality as well as meeting a minimum (although high) quality baseline.

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?
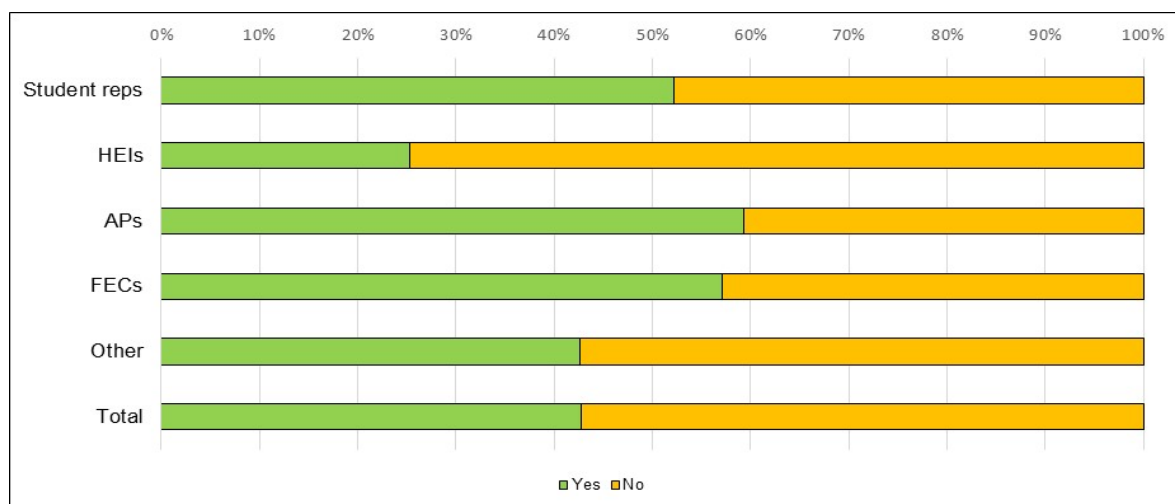
Response	Total	Percent
Yes	128	42.8%
No	171	57.2%

Overall, more respondents said no than yes to this proposal for the OfS to consider exploring alternative methods of assessment, alongside the work the sector is undertaking itself. Of those respondents that were supportive (42.8%), the majority of this group caveated their support along the lines that while there are some strengths in the use of GPA, they questioned whether this is urgently needed now, whether its introduction could wait, and indeed questioned whether GPA itself is the answer to improving assessment. In addition, respondents felt that more work needs to be done by the OfS, in partnership with stakeholders, to demonstrate that a GPA approach to degree classification would produce greater consistency than the current arrangements.

From those disagreeing that the OfS should explore alternative methods of assessment, there was limited appetite for further expansion of the GPA methodology as a way to address grade inflation. Indeed, there was much criticism about GPA in the responses - that GPA is not 'a method of assessment' but a formula for comparing the overall performance of one student with another and with a cohort as a whole. Respondents

referred to it being applied with different algorithms in different institutions, and so not providing a sector-wide standard approach, and stated that grade inflation is still prevalent in higher education sectors (i.e. the USA) where GPA is in use – so it is not considered to be a robust mechanism to tackle this issue.

There was also widespread concern (especially from providers and some sector bodies) that a regulatory approach to new methods of assessment would appear to be imposing an approach on the sector which contradicts sector autonomy and the OfS's own principle of focusing on outcomes (not processes).

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?
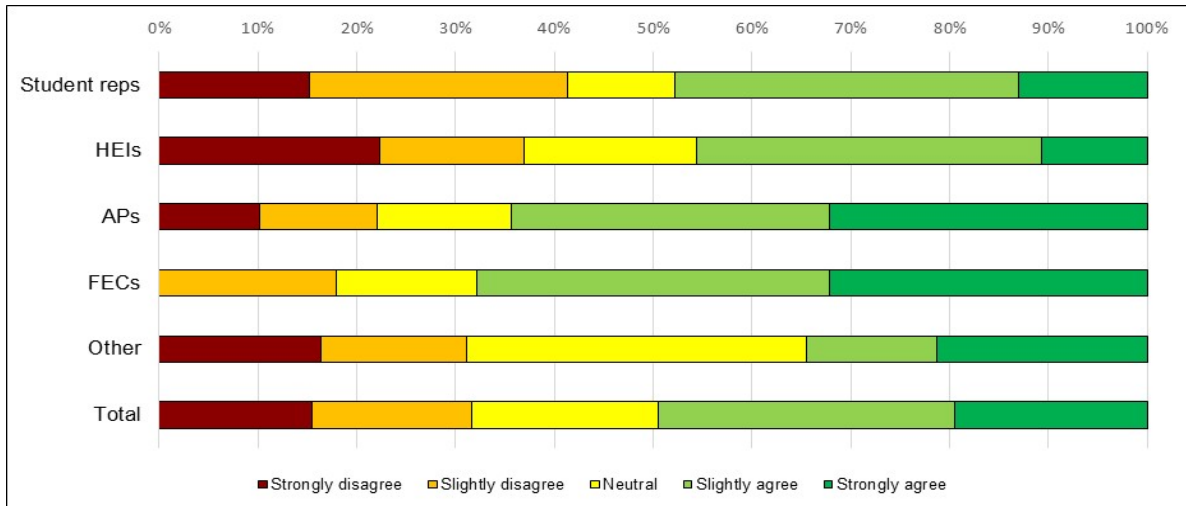
Response	Total	Percent
Strongly disagree	46	15.5%
Slightly disagree	48	16.2%
Neutral	56	18.9%
Slightly agree	89	30.0%
Strongly agree	58	19.5%
Total	**297**	**100%**

While there was a relatively even split of responses in terms of agreement/disagreement, there was a recurring theme raised by nearly a third of all respondents, stating that this condition should apply to providers in the Registered (basic) category as well as those providers in the Approved categories.

Of those who agreed with the condition, there were views that it was consistent with the CMA's existing guidance, and that this was preferable, for example, to a new system. Others indicated that the principle of clear and transparent information, terms and conditions and complaints processes was appropriate.

Of those who disagreed, a significant proportion of respondents raised questions relating to the language used in the condition, with many of these considering it to be part of an unhelpful wider narrative, which commodifies education and/or minimises the importance of students' collective rights and established systems of redress. Additionally, some responses argued that some of the language used in the condition was confusing or misleading. This was particularly in relation to the use of the term 'contracts'. Responses argued it might confuse students by incorrectly implying there is now a change in the legal status in relation to existing student partnership agreements or student charters, or detract from their established status.

Other respondents queried the purpose of the condition, whether consumer rights was the right focus, and how the OfS's role sat alongside other bodies such as the CMA and the OIA. Many respondents also called for clarification on the OfS's intentions around 'future work' (as detailed in the guidance, around either mandating or 'imposing' model contracts).

Question 6 - What more could the OfS do to ensure students receive value for money?

NOTE: There were no metrics captured for this question in the consultation – qualitative responses only.

There was a diverse range of responses to this question, which included the opinion that the OfS should take no action, though more respondents thought it was appropriate for the OfS to take an interest in this issue, particularly seeking clarity on what was meant by value for money. It was highlighted that value for money could mean different things to different groups and should account for the diversity of the sector. Respondents also highlighted the wider benefit of higher education to society, suggesting that any definition should encompass the wider student experience, noting that the value derived from higher education might not be apparent until years after graduation.

High quality teaching was mentioned as an important consideration for value for money. Some responses suggested that contact hours could be used to inform value for money, but others opposed this. Some responses suggested a focus on learning gain, while other responses prioritised outcomes (including graduate salary) or public good as provided by vocational degrees, health, wellbeing, citizenship and community. It was suggested, by both providers and student bodies, that there should be a focus on support for current students (e.g. support for mental health) rather than expansion activity (e.g. new buildings, recruitment) from which current students would see less benefit. In contrast, there was concern, in particular from providers, that such a focus might restrict their ability to plan strategically.

The issue of cross-subsidy was also reflected in a number of ways – there were responses that questioned cross-subsidy between courses, while others emphasised that such cross-subsidy was important. It was noted that in some cases providers may profit from certain areas, e.g. accommodation. In areas such as this, it was argued that providers should be more transparent.

Many student bodies expressed support for improved transparency, so that students could see where fees were being spent, enabling them to more easily compare providers. It was also suggested that transparency should extend to giving students a clearer picture of the total cost of studying at a particular provider by giving information on additional course expenses.

A number of responses, from both providers and student representatives, criticised the idea of reducing the role of students to one of consumers and emphasised the benefits of students acting in partnership with their providers. This included having increased involvement in teaching, learning and assessment and in governance (particularly in remuneration committees).

The role of students' unions was also mentioned in terms of supporting the provision of value for money. It was suggested that the OfS could support students' unions in providing services for students.

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 the OfS should focus when highlighting good practice?
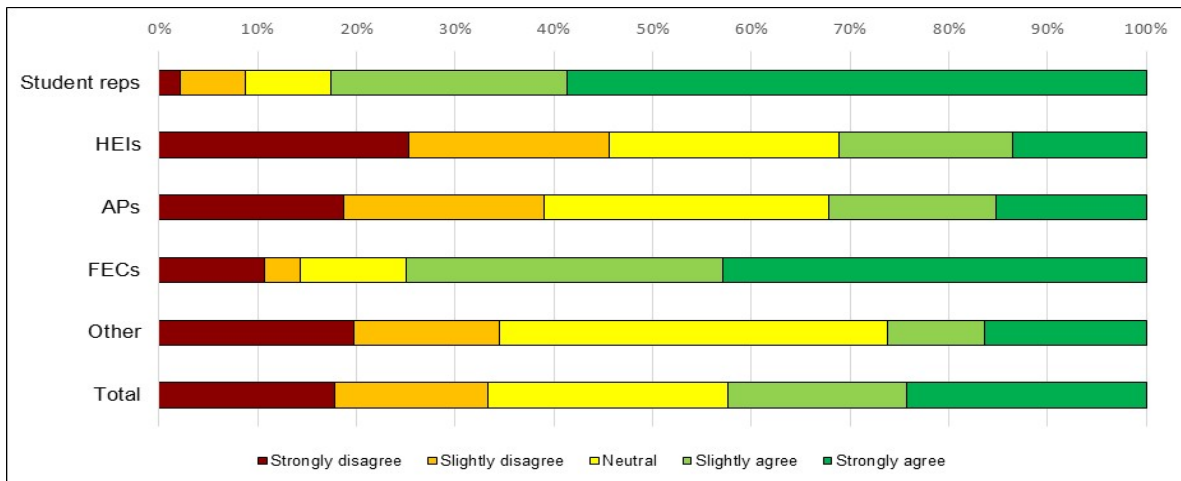
Response	Total	Percent
Strongly disagree	53	17.8%
Slightly disagree	46	15.5%
Neutral	72	24.2%
Slightly agree	54	18.2%
Strongly agree	72	24.2%
Total	**297**	**100%**

Overall, views of respondents on this question were split, though more supported the proposal than opposed it (42% versus 33% respectively). Of those supporting this condition, many argued for it to go further, for instance with action on pay scales as a

whole or requiring providers to keep within pay ratios. There were also arguments for more transparency around remuneration committees, or student representation on them.

Some opposition was based on the belief that the OfS would make an assessment if pay over £150,000 was justified, rather than simply requiring a justification to be published. Others thought the thresholds at £100,000 and £150,000 felt arbitrary and wanted to know if they would change over time.

Concerns were raised on the administrative burden, the requirement for role descriptions, and the inclusion of academic staff. There were specific concerns from certain providers, including medical schools where staff were paid on NHS pay scales, and further education colleges that were already covered by the Education and Skills Funding Agency reporting requirements.

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 future policy development.

NOTE: There were no metrics captured for this question in the consultation – qualitative responses only.

Responses were broadly supportive that, if properly implemented, the OfS's central objectives should have a positive impact on equality. They also supported the recognition that widening participation needs further intervention beyond a reliance on market forces. Respondents did, however, request more details on implementation and a greater focus on non-traditional modes of study.

Some respondents also expressed views that the OfS could have a long term sector-level role in monitoring and tackling inequalities and discrimination. A diverse range of providers were concerned that the risk-based model may disincentivise providers from widening participation work, as recruiting higher proportions of disadvantaged students (who tend to carry higher rates of non-completion) may result in higher risk profiles. Concerns were also raised (particularly by alternative providers, further education colleges and their mission groups) that compliance burdens would disproportionately affect smaller providers, and could result in closure. Respondents felt that this might make higher education less accessible to disadvantaged and less geographically mobile students.

Respondents (particularly student representatives, providers and mission groups) also raised concerns about the lack of protection for students studying at Registered (basic) providers.

A number of respondents also raised the lack of an accompanying Equality Analysis at this stage of public consultation.

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?
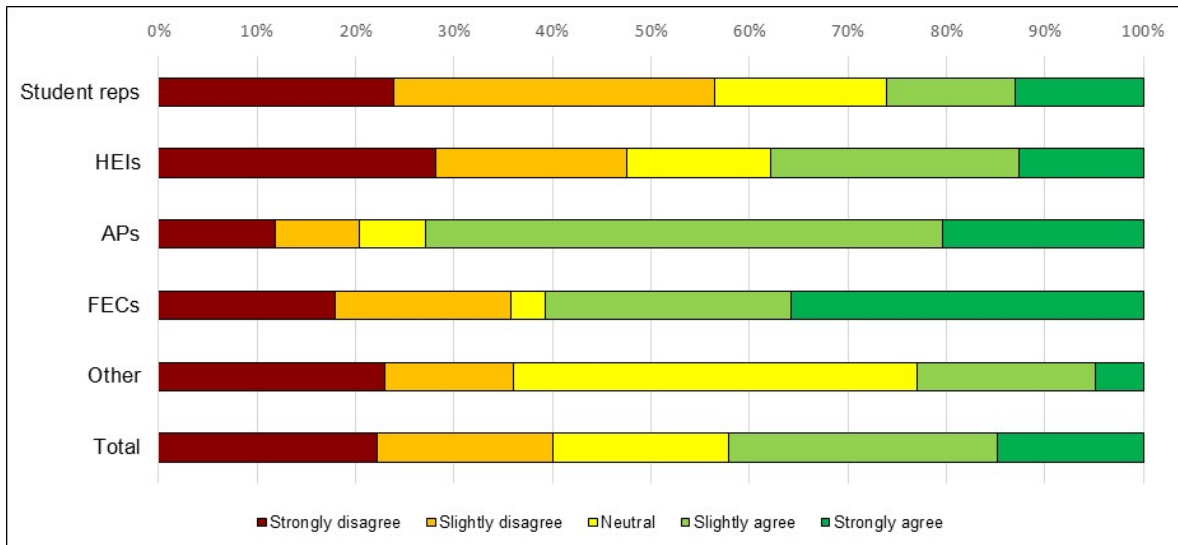
Response	Total	Percent
Strongly disagree	66	22.2%
Slightly disagree	53	17.8%
Neutral	53	17.8%
Slightly agree	81	27.3%
Strongly agree	44	14.8%

While respondents were almost evenly split along levels of agreement versus disagreement, the comments were broadly positive, with providers expressing support for the framework overall and welcoming the commitment to improve teaching excellence in higher education. Those in favour of the proposal claimed that making participation in the Teaching Excellence and Student Outcomes Framework (TEF) a condition of registration would create a level playing field for providers and provide students with comparable, consistent data. Some respondents also supported this decision as a method of ensuring

value for money, both for students and the taxpayers, by ensuring providers in receipt of Government funding were providing excellent teaching.

Over a quarter of respondents felt that the decision of whether to make TEF a condition of registration should not be taken until such time as the independent review has concluded and the TEF has taken account of its recommendations. They considered that TEF was still in its development phase and needed to become better established.

Some argued that if it was required for some it should be required for all, with no exemption for small providers, and others that even with an exemption, small providers risked reputational damage if they did not have the resources to take part. Similarly, providers ineligible for the TEF (due to e.g. being largely international or postgraduate) might face reputational damage.

A small number of respondents challenged that there is no statutory basis to include TEF as a condition of registration, as HERA states that providers would be rated as part of a scheme '*where they apply for such a rating*'. Respondents commented that making TEF mandatory would be a departure from the intention of HERA and of Parliament.

Some respondents also sought clarification as to whether the 500 student limit referred to overall headcount or full time equivalent numbers (FTE).

Question 10 - Do you agree or disagree with the proposed ongoing general registration condition requiring the publication of information on student transfer arrangements?
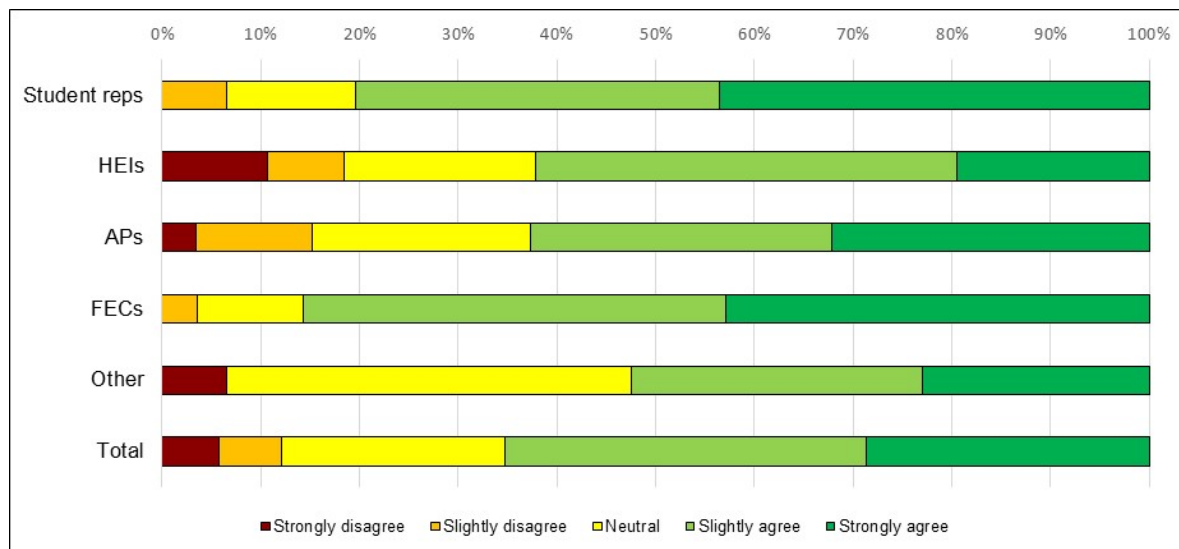
Response	Total	Percent
Strongly disagree	17	5.7%
Slightly disagree	19	6.4%
Neutral	67	22.6%
Slightly agree	109	36.7%
Strongly agree	85	28.6%
Total	**297**	**100%**

This question prompted widespread agreement: nearly two-thirds of responses agreed with the proposed condition including a majority of respondents in every category and over 80% of student representatives. Reasons cited included the promotion of a more flexible approach to study to both providers and students.

Those who disagreed argued that there was low demand and that it might be burdensome, especially for small providers, if monitored at module level rather than programme level. Concerns were also raised that transfers out would appear as 'non-completion' of a course, affecting a provider's compliance with this condition.

In response to the additional question about how the OfS might best facilitate, encourage or promote the provision of student transfer arrangements, respondents also suggested other ways to support transfer beyond the regulatory framework, such as dissemination of good practice and examining other barriers.

Question 11 - Do you agree or disagree with the proposed approach to sector level regulation in chapter 2?
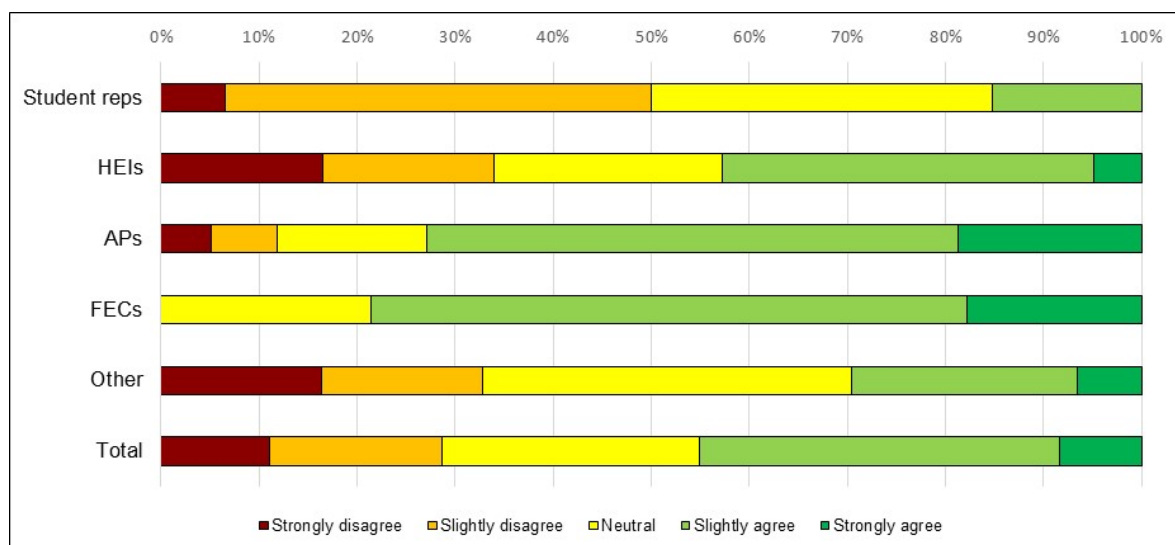
Response	Total	Percent
Strongly disagree	33	11.1%
Slightly disagree	52	17.5%
Neutral	78	26.3%
Slightly agree	109	36.7%
Strongly agree	25	8.4%
Total	**297**	**100%**

While overall responses were largely positive or neutral, over 50% of student representatives disagreed with the proposed approach and less than 20% agreed with it.

Of the responses that engaged with the sector level proposals specifically in chapter 2 of the consultation, comments were broadly supportive (in particular of thematic reviews and the importance of student information). There were, however, a significant number of responses that focused on provider level regulation in their commentary. This largely

reiterated points made in response to other questions (and covered elsewhere in this document), including concerns around regulatory burden, the possible duplication of regulation of students' unions with the Charity Commission, and comments on individual conditions.

Among those who disagreed, there was significant opposition across the range of responses to any implication that higher education could be treated like a typical consumer goods market, though many responses did note that the consultation text acknowledged this. A related challenge from several respondents was an opposition to marketisation: some respondents opposed marketisation on principle, whilst others doubted whether it would drive the continuous improvement that the consultation presumed it would.

A significant number of respondents raised concerns about the market-focused language in the consultation and the belief that choice and competition could improve quality. Some argued that students must be seen as co-producers as well as consumers.

There were widespread calls for a greater emphasis on student engagement, building on the newly created OfS student panel as the means by which the OfS can engage students and seek to understand students' interests more widely. Calls for student engagement extended to the proposals on thematic reviews, which were generally perceived as being positive.

Question 12 - If you are a provider, can you provide an indication of which category you would apply for (under these proposals) and why?
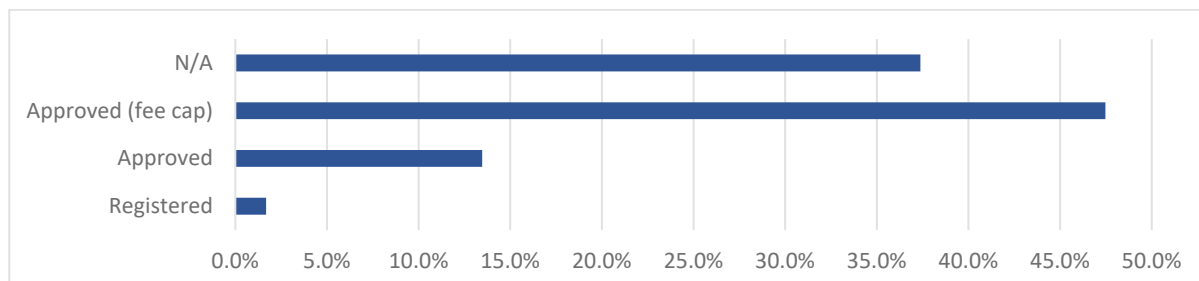
Response	Total	Percent
Registered (basic)	5	1.7%
Approved	40	13.5%
Approved (fee cap)	141	47.5%
N/A	111	37.4%
Total	**297**	**100%**

This question was asked to inform the OfS's planning for the transition and registration processes. The figures above do not reflect a representative cross-section of the sector as a whole, given only a proportion of the currently regulated sector responded.

The majority of those who said they would apply for Approved (fee cap) said they would do so for reasons including: their retention of their Degree Awarding Powers (DAPs), University Title (UT) and Tier 4 Licence; their right to charge fees above the basic amount with equivalent loan funding for students; and their access to research funding.

Question 13 - The initial conditions should provide reassurance that providers will meet the general ongoing conditions without creating unnecessary barriers to entry. Given this, are the initial conditions appropriate?
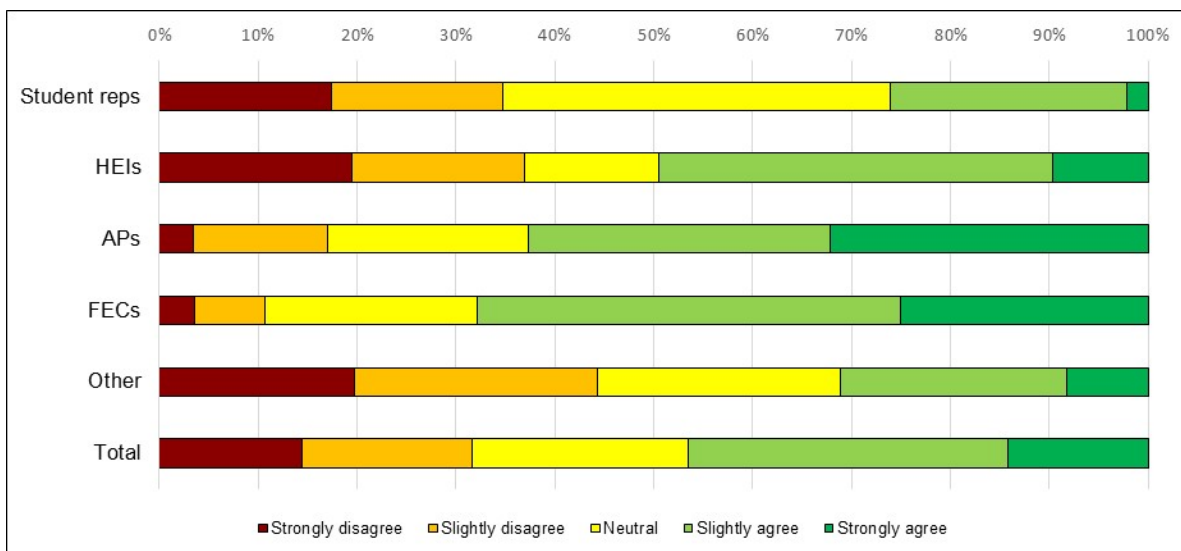
Response	Total	Percent
Strongly disagree	43	14.5%
Slightly disagree	51	17.2%
Neutral	65	21.9%
Slightly agree	96	32.3%
Strongly agree	42	14.1%
Total	**297**	**100%**

There was broad overall support for those conditions applied to Approved and Approved (fee cap) categories – with respondents generally querying the underpinning detail and seeking clarification, rather than disagreeing with the principles of what the OfS would be seeking to regulate, or how it would do so.

The main area of concern across student representatives, providers and their representatives was that additional conditions should be applicable to the Registered (basic) category, especially on student protection, although a wide range of additional conditions were proposed in total. Whilst respondents appreciated that the aim was to make conditions proportionate, some argued that, given there is a focus on students, the conditions should be proportionate to the risk to students, not related to the benefits accessed by the provider. Of the responses to this question, a significant number requested more conditions for the Registered (basic) category, many of which mentioned applying student protection plans.

There were some calls for a risk-based approach to be extended to the applicability of certain conditions, i.e. only apply certain ongoing conditions (such as student protection plans) to providers that present a higher risk. Respondents argued that this would be a significant reduction in burden for low risk providers. Alongside this, there were a few concerns around initial burden during transition and minimising burden during registration, along with financial impact upon smaller providers.

Question 14 - Do you agree or disagree with the proposed lists of public interest principles in the guidance, and who they apply to?
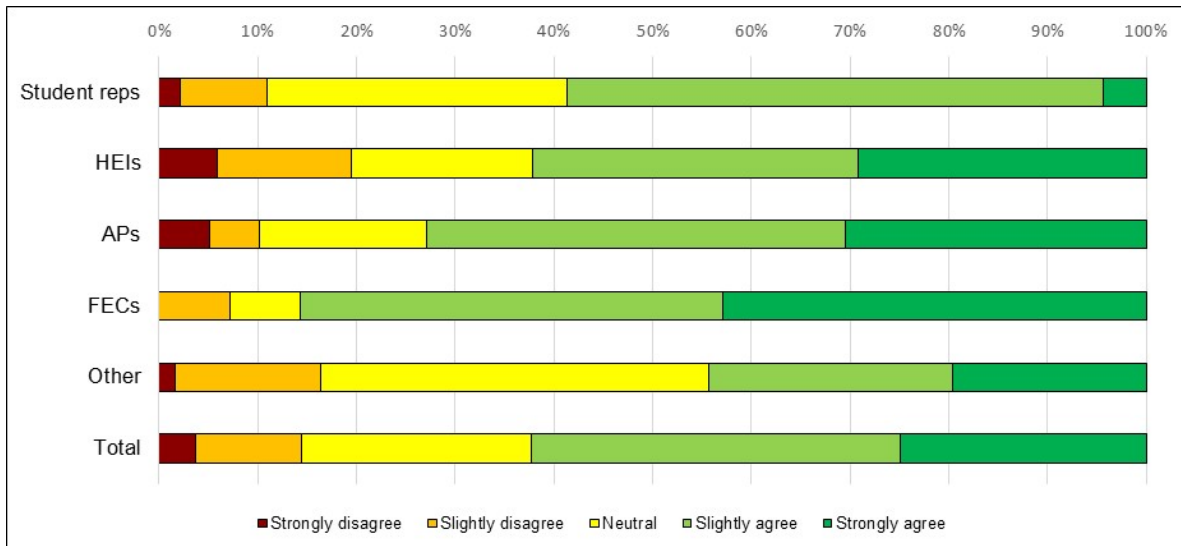
Response	Total	Percent
Strongly disagree	11	3.7%
Slightly disagree	32	10.8%
Neutral	69	23.2%
Slightly agree	111	37.4%
Strongly agree	74	24.9%
Total	**297**	**100%**

Responses were overall supportive, with over 80% of respondents in each category being neutral or agreeing with the proposed principles. The reasons given for agreeing with the principles were largely around a perception that these principles were proportionate, well established, and would support good governance. One respondent, for instance, stated that *"The proposed principles are encompassing and worthy."*

A relatively small percentage (<10%) of respondents raised concerns relating to a lack of student representation/engagement, and this was a theme that was also raised by student representatives during our engagement period. Other responses covered a wide spectrum of smaller points, with few patterns emerging. Points made by respondents included:

- A request for OfS flexibility a) in the early years, and b) for providers with different corporate forms (such as further education colleges)
- Suggestions that public interest principles should apply to Registered (basic) providers as well as those in the Approved categories
- Requests to reflect the wider role of providers, in particular universities, in relation to the UK's economy, society, culture and international reputation.
- Concern around the fit and proper principle, which some respondents read to mean that if any indicator is not met, the person in question will be deemed not fit and proper.

Some respondents sought clarification about how OfS would monitor compliance and others sought reassurance that different legal forms would be taken into account.

Around 15% of respondents referred to the freedom of speech principle, with a mix of positive and negative comments on this. The main issues raised on freedom of speech were:

- Universities UK argued that the public interest principles should not be used to deliver wider policy goals, and on this basis opposed the inclusion of the freedom of speech principle
- Legal concerns that the proposal goes beyond HERA or the Education (No. 2) Act 1986 (raised in particular by Universities UK)
- Concerns about the impact on academic freedom/institutional autonomy
- Significant strength of feeling from students' unions that this proposal should not encroach on their autonomy.

Under HERA, there is a requirement to consult the Secretary of State (as well as others) in relation to the public interest principles.[4] This requirement has been met through the Department for Education's preparation and issue of consultation documentation, which included proposed public interest principles, and by having Secretary of State representation at OfS Board meetings.

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[4] HERA section 14 includes a duty to consult the Secretary of State and others, including the representative bodies of providers.

Question 15 - Do you agree or disagree with the proposed approach on the application of conditions for providers wishing to seek a Tier 4 licence?
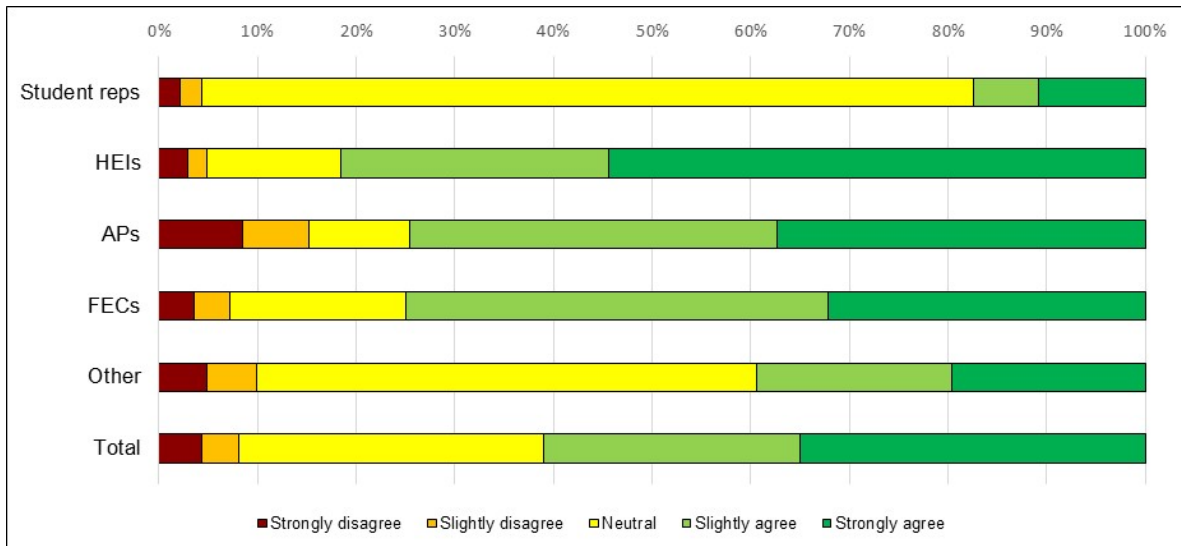
Response	Total	Percent
Strongly disagree	13	4.4%
Slightly disagree	11	3.7%
Neutral	92	31.0%
Slightly agree	77	25.9%
Strongly agree	104	35.0%
Total	**297**	**100%**

There was widespread support in principle for the proposals to extend visa benefits to all those in the Approved categories with a track record of compliance. Independent Higher Education responded, "*We strongly support the Home Office proposal that all providers registered in the Approved categories who have a track record of immigration compliance will benefit from the full privileges of Tier 4*". GuildHE wrote that *"The extension of the*

benefits associated with Tier 4 to private providers and publicly funded FECs that publicly funded HEIs currently receive with Tier 4 is very welcome".

Key issues raised focused on:
- potential burdens for smaller providers (especially those seeking Tier 4 only),
- a need for clarity on how the need to register fits with the obligation to hold a Tier 4 licence (particularly for franchise only providers),
- linked to the above, more clarity for embedded/pathway/collaborative venture and study abroad providers,
- additional Ofsted requirements for FECs,
- potential separate educational oversight arrangements for below Level 4 in the Framework for Higher Education Qualification,
- a call for the removal of in-country restrictions on student visa transfers.

There were also several concerns noted that the arrangements related to English providers only, with calls for information on corresponding devolved authority arrangements. Some respondents expressed their desire for there not to be too great a divergence between devolved authority and OfS arrangements.

Question 16 – Do you agree or disagree that paragraph 7 and 8 should be removed from Schedule 2 of the Education (Student Support) Regulations 2011, which lists the types of courses that allow with access to the student support system? If you disagree, are you aware of any courses dependent on these provisions to be eligible for support?
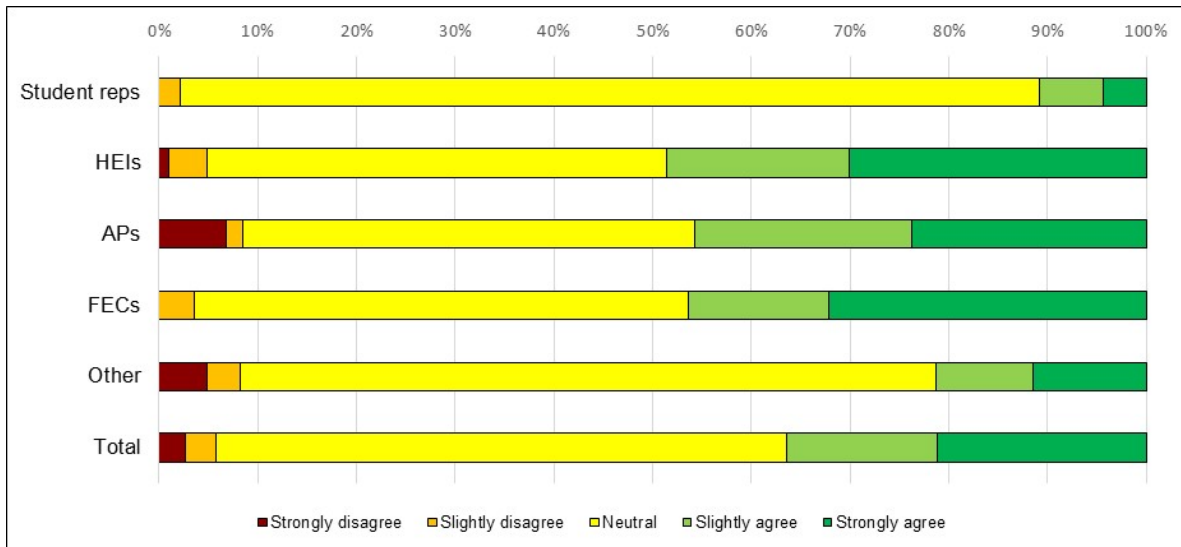
Response	Total	Percent
Strongly disagree	8	2.7%
Slightly disagree	9	3.0%
Neutral	172	57.9%
Slightly agree	45	15.2%
Strongly agree	63	21.2%
Total	**297**	**100%**

Respondents were overall supportive or neutral regarding the proposal to remove paragraphs 7 and 8 from Schedule 2 of the Education (Student Support) Regulations 2011. Many of the comments confirmed that the current paragraphs 7 and 8 were unclear and ambiguous, and that removing them would make the regulations clearer.

There were some concerns raised about the potential impact on access to higher education and Year 0 courses, with implications for widening participation more broadly. Some alternative providers and Independent Higher Education suggested waiting until the DfE Level 4 and 5 Review has taken place. There were also some potential cross-border issues raised. One respondent identified some courses potentially covered by these paragraphs and raised concerns that removing the paragraphs might stifle innovation in "*smaller, more flexible tranches of learning*".

DfE next steps

DfE will consider whether any changes are required to the list of Designated Courses for higher education student support when the Level 4 and 5 Review reports back.

We can clarify that Level 3 Access courses (Access to Higher Education Diplomas) are supported under Advanced Learner Loans. Year 0 courses can be eligible for student support if they are integral to an Honours Degree course.

With regards to Foundation Degrees, these are included in the category of "A first degree course" in The Education (Student Support) Regulations 2011, Schedule 2, paragraph 1, and so will not be affected.

DfE is currently working with the respondent which identified some courses potentially covered by these paragraphs to understand more about these and is exploring whether a new category is needed for these types of courses. We have asked the Student Loans Company to undertake further analysis of whether any other similar courses are affected.

Question 17 – Do you agree or disagree with the proposed approach for the benefits available to providers in the different registration categories?
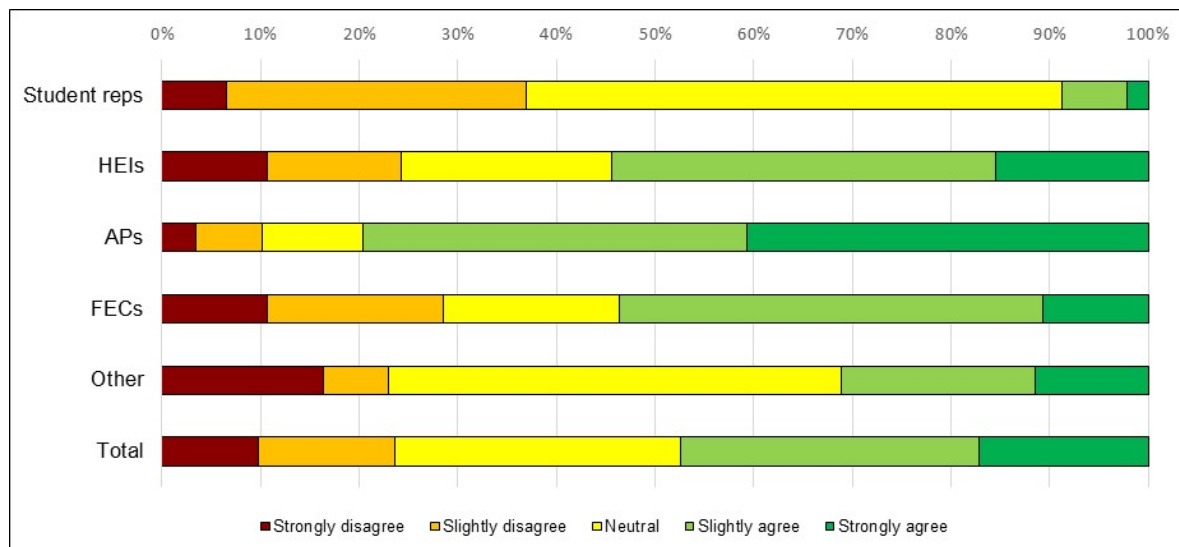
Response	Total	Percent
Strongly disagree	29	9.8%
Slightly disagree	41	13.8%
Neutral	86	29.0%
Slightly agree	90	30.3%
Strongly agree	51	17.2%
Total	**297**	**100%**

Responses were mixed across respondent types, but generally, respondents were in favour of the Approved categories and their links to benefits and conditions. The importance of students having clear information on the difference in regulation between Registered (basic) and Approved categories was emphasised by respondents.

There was support for the ability to enrol overseas students and the potential to gain DAPs, particularly from alternative providers. Provider-level designation for Approved providers was also mentioned by several providers as a positive step.

Concerns were raised about the Registered (basic) category, with respondents calling for more conditions in the interests of student protection. Student protection plans were proposed in particular. Some also argued that degree-awarding powers should not be available to Registered (basic) providers because of the lack of assurance undertaken in this category, with the result that those with Degree Awarding Powers should not be able to move into that category.

A number of respondents also questioned why most public funding (particularly research funding) would only be available to Approved (fee cap) providers.

Question 18 – Do you agree or disagree with the general ongoing registration conditions proposed for each category of provider?
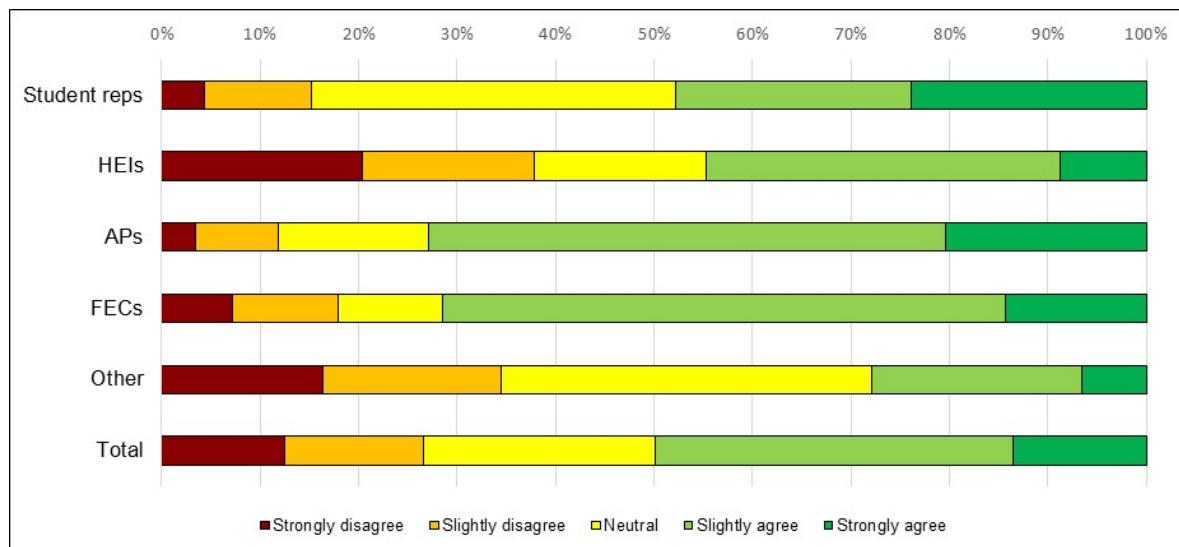
Response	Total	Percent
Strongly disagree	37	12.5%
Slightly disagree	42	14.1%
Neutral	70	23.6%
Slightly agree	108	36.4%
Strongly agree	40	13.5%
Total	**297**	**100%**

Overall, respondents supported the general ongoing registration conditions that were proposed, but with some exceptions in relation to certain conditions. Universities UK and some other respondents sought clarification on whether all of these conditions were truly baseline or if some were driven by other policy goals.

There was particular support for the conditions applied to Approved categories.

However, there were widespread calls for the Registered (basic) category to carry additional conditions to protect students' interests, such as transparency, student protection plans, student transfer and electoral registration conditions. Respondents were concerned that students at those providers in the Registered (basic) category would be at risk of assuming greater protection than will be provided in that category. Some respondents challenged the proposals on grounds of proportionality regarding the same conditions applying to lower and higher risk providers within a category, and called for conditions to be waived for the lowest risk providers.

Other issues raised in response to this question included calls for clarity on how risk assessment and monitoring would work in relation to the conditions, questions about transition, and concerns from alternative providers about specific data sets and the burden of data collection.

Question 19 – Do you agree or disagree with the proposed approach to risk assessment and monitoring?
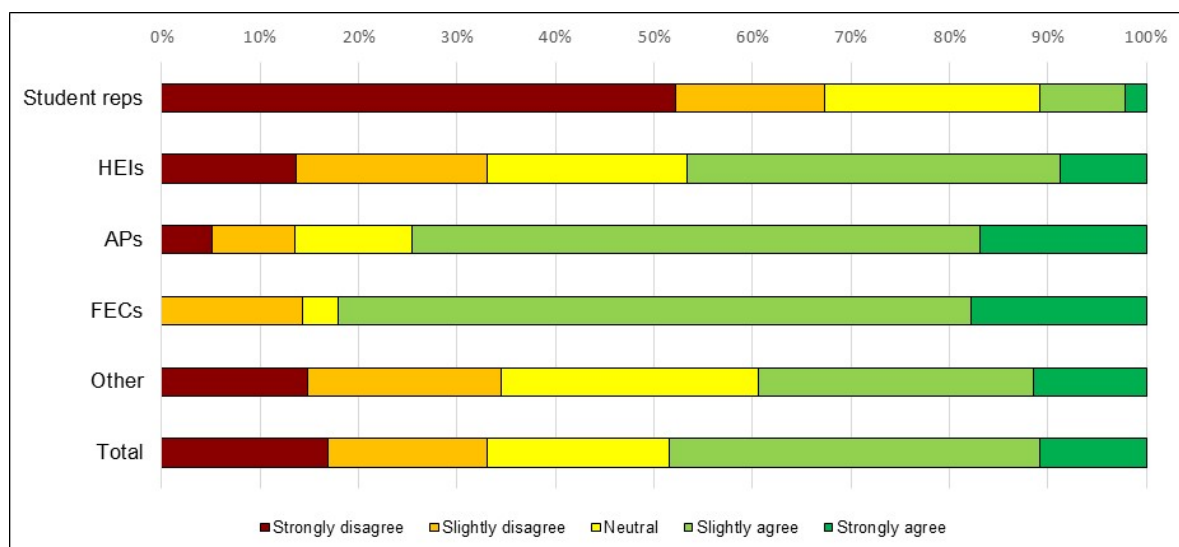
Response	Total	Percent
Strongly disagree	50	16.8%
Slightly disagree	48	16.2%
Neutral	55	18.5%
Slightly agree	112	37.7%
Strongly agree	32	10.8%
Total	**297**	**100%**

The range of responses broadly fall under two main themes:

- The NUS and a majority of student representatives expressed concerns around the fundamental principles of adopting a risk-based approach (being too retrospective in nature and at odds with an outcomes-based approach)
- Providers however were broadly supportive of the risk-based approach (as the proposed lead indicators are broadly familiar and in line with a baseline approach)

while expressing concerns around the practicalities of meeting their compliance obligations under this approach.

A range of providers and student representatives also requested clarification around the practical requirements and intended purposes of the random sampling and efficiency studies approaches.

Some representative groups (Russell Group and members) also raised queries on whether contextual information would be taken into account by the OfS in making ongoing assessments of provider risk and whether a provider's track record would be taken into account at point of registration (MillionPlus).

Independent Higher Education and a number of its members suggested the OfS should also consider adopting or replicating the current approach to engagement with alternative providers.

There was widespread agreement that the risk assessments and risk profiles of providers should not be published – no responses opposed this proposal. Universities UK and a small number of individual providers queried whether providers themselves would be informed of their individual risk profiles on a cyclical or annual basis and proposed they should be.

Question 20 - Do you agree or disagree with the proposed approach on interventions (including sanctions) and do you agree or disagree with the proposed factors the OfS should take into account when considering whether to intervene and what intervention action to take?
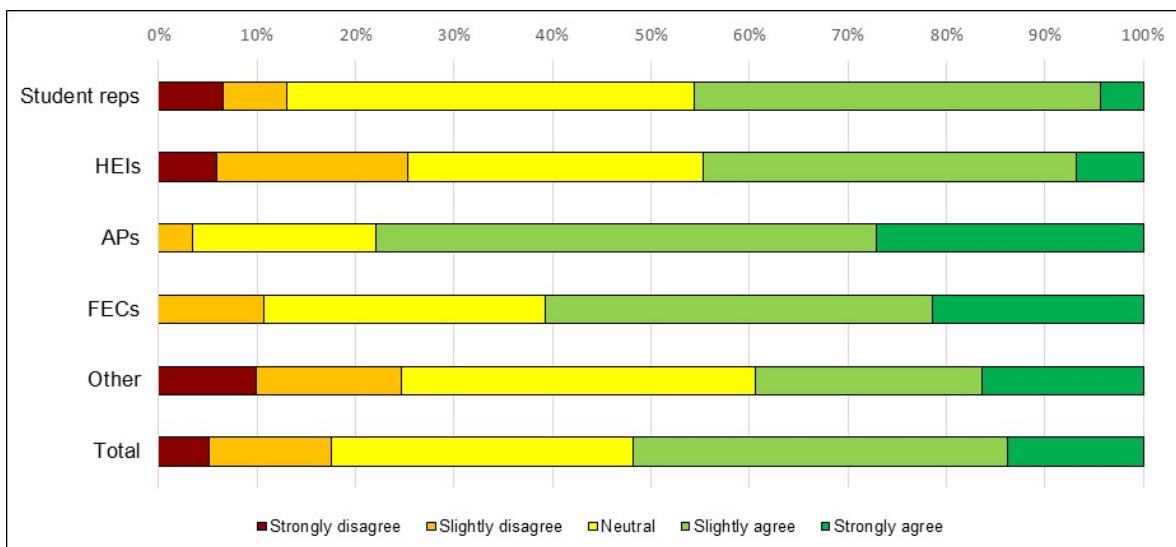
Response	Total	Percent
Strongly disagree	15	5.1%
Slightly disagree	37	12.5%
Neutral	91	30.6%
Slightly agree	113	38.0%
Strongly agree	41	13.8%
Total	**297**	**100%**

The responses were broadly supportive of the consultation proposals, including the proposed intervention factors, and the range of available interventions and sanctions.

However, respondents would like more clarity on the triggers and circumstances for when interventions may be used.

One respondent commented positively on the "availability of a range of appropriate sanctions, along with an approach that uses risk-based and other factors in assessing a provider's particular situation". Respondents were particularly supportive of the OfS having an open and honest dialogue with providers.

Where providers had said they did not agree with the proposals, in a significant number of cases these were based on concerns that the OfS would make decisions on data without taking into account the context for that data.

There were calls for an appeals process for suspension of registration. Additionally, concerns were expressed that before imposing a sanction, the OfS should take into account the impact of that sanction on students. Some students' unions called for the OfS to engage with them before imposing a sanction.

Question 21 - Do you agree or disagree with the proposed approach the OfS will take to regulating providers not solely based in England?
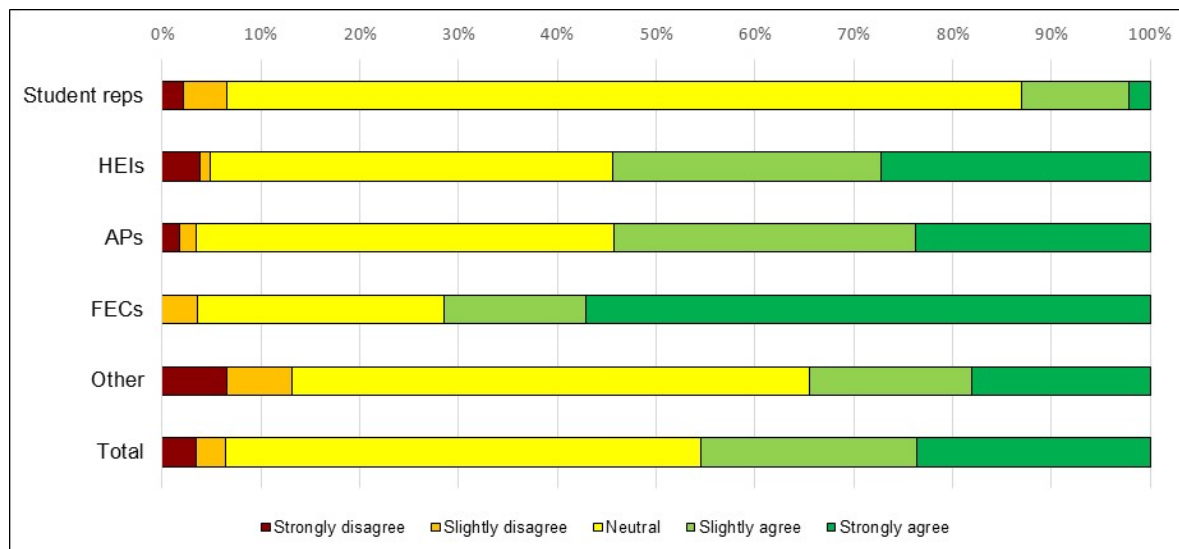
Response	Total	Percent
Strongly disagree	10	3.4%
Slightly disagree	9	3.0%
Neutral	143	48.1%
Slightly agree	65	21.9%
Strongly agree	70	23.6%
Total	**297**	**100%**

The majority of respondents were largely supportive of, or neutral, regarding the proposed approach the OfS takes to regulating providers not solely based in England. Only 6.4% disagreed with our proposed approach. There were significant calls for UK-wide consistency and protection of UK-wide reputation, and for ensuring that students' interests would be protected.

Of those that disagreed, a number of comments focused on concerns regarding Tier 4 issues and consistency across the UK. Concerns were also voiced about the impact on the reputation of UK higher education if individual policies and approaches to higher education within England and the devolved administrations diverged too far from each other. Some calls were also made for clarity on the regulation of transnational education[5], particularly in relation to their particular risks, and the ownership and accountability of such providers.

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[5] The provision of higher education from institutions in one country to students in another.

Question 22 - Do you agree or disagree with what additional information is proposed that the OfS publishes on the OfS Register?
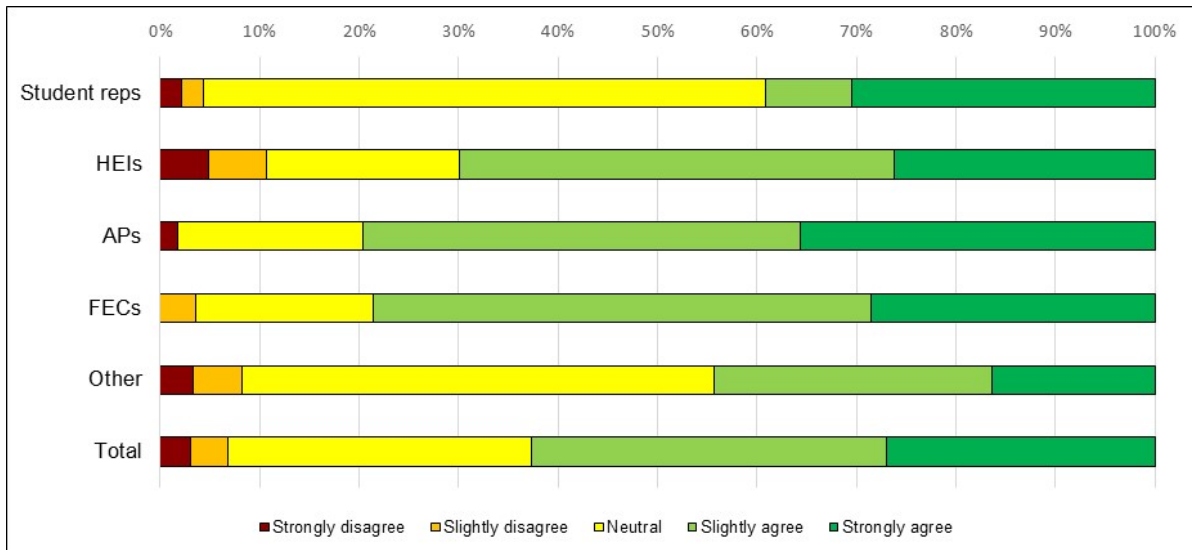
Response	Total	Percent
Strongly disagree	9	3.0%
Slightly disagree	11	3.7%
Neutral	91	30.6%
Slightly agree	106	35.7%
Strongly agree	80	26.9%
Total	**297**	**100%**

Overall, the majority of respondents agreed with the proposals for additional information to be published on the OfS register. There were some requests for the OfS to give some clarity on particular details.

Whilst there was significant support for proposals, particularly around the requirement for information to be up-to-date, there were concerns expressed by some providers on the potential negative impact of displaying information on sanctions (beyond what is required as part of HERA) and specific conditions. Additionally, there were requests for confirmation that information would only be published after full investigation, with opportunity for the institution to respond.

Question 23 - Do you agree or disagree with the principles proposed for how the OfS will engage with other bodies?
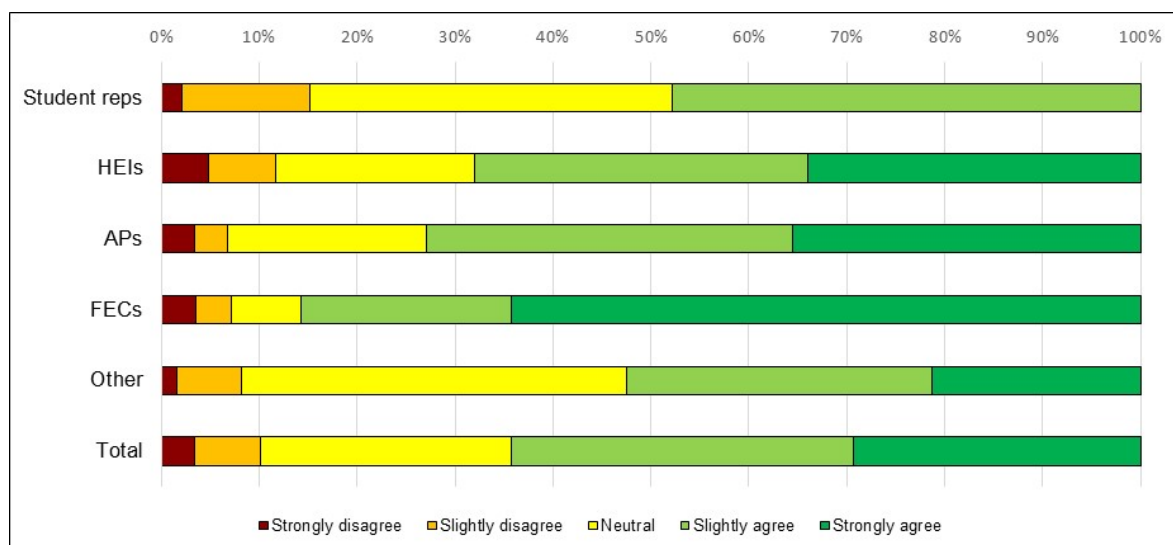
Response	Total	Percent
Strongly disagree	10	3.4%
Slightly disagree	20	6.7%
Neutral	76	25.6%
Slightly agree	104	35.0%
Strongly agree	87	29.3%
Total	**297**	**100%**

Overall, the majority of respondents were supportive of the principles proposed for how the OfS will engage with other bodies. Respondents supported proposals for collaboration and joint working.

Respondents particularly welcomed the aim to minimise duplication and burden to providers where possible. They agreed with the need for cooperation with UKRI as a particular area of focus, related to the Industrial Strategy, Research Excellence

Framework, Knowledge Exchange Framework and Teaching Excellence and Student Outcomes Framework, as well as day-to-day communication.

There were calls for greater clarity on how interactions would work in practice, with some respondents expressing concern that groups such as postgraduate research students and degree apprentices might '*fall between*' the remit of various bodies. Some respondents sought clarity on how the OfS would cooperate with the devolved nations and bodies to ensure cohesion across the UK.

Question 24 - Do you have any comments on the proposed exercise of OfS functions in relation to validation, in particular in relation to ensuring that the validation service is underpinned by the necessary expertise and operates in a way that prevents or effectively mitigates conflicts of interest?

NOTE: There were no metrics captured for this question in the consultation – qualitative responses only.

The majority of responses focused on the OfS acting as a validator, with a few responses referring to commissioning arrangements. It was felt that the OfS should have a role in making the market work in a better, fairer way, with more detail requested particularly on the specific role of validator of last resort.

The responses demonstrated a strong need for validation within higher education and supported the OfS working to improve validation services. Many respondents who were positive about validation in the regulatory framework sought further clarification on how the OfS would act as a validator and would like to ensure that students are protected.

There was a widely held view from respondents that if the OfS became a validator this would create a conflict of interest, with concerns expressed on "how can a regulator regulate itself". A large number of respondents provided negative views on the OfS becoming a validator of last resort and the majority of these expressed views that there should be an external body that should act as a validator of last resort.

Question 25 - Does the information provided offer a sufficiently clear explanation of how a provider will apply for registration in the transitional period and what the consequences of registration are in this period?
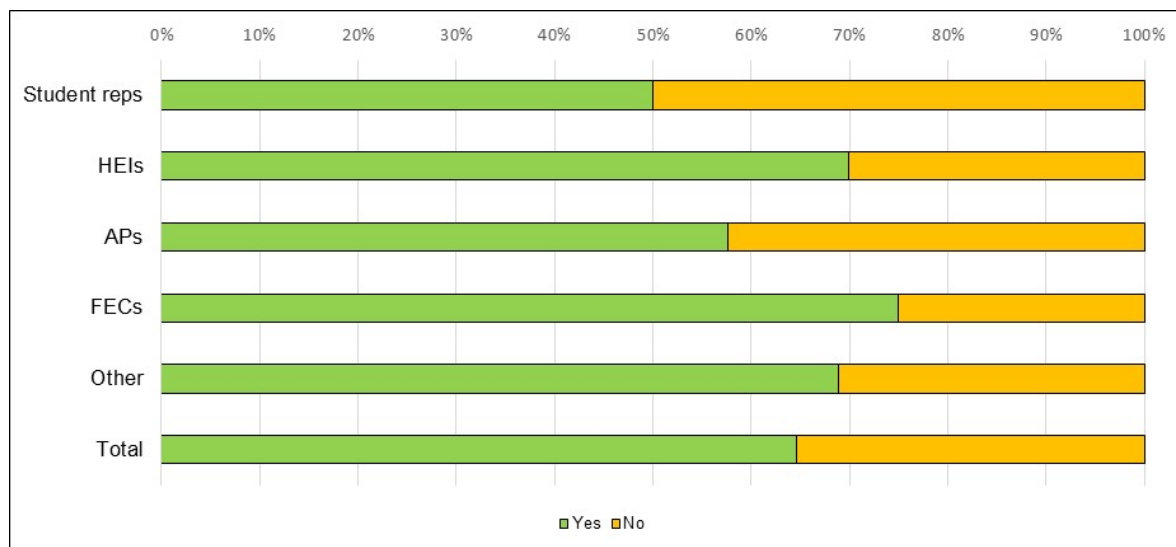
Response	Total	Percent
Yes	192	64.6%
No	105	35.4%
Total	**297**	**100%**

Respondents, across the range of providers, mainly felt that the information provided clearly explained how a provider will apply for registration in the transitional period and what the consequences of registration would be in this period. The majority of comments focused on asking specific questions, with requests from further education colleges in particular for support during the transition period.

The responses were broadly supportive of the proposals for initial registration and processes in the transition period. There were requests for clarification on what existing information can be used, and on how processes with QAA for quality reviews and educational oversight (Tier 4) will be consolidated with initial registration to reduce duplication.

There were some concerns that the timelines for implementation appeared very tight, with particular worries from smaller providers and alternative providers about the burden of satisfying the new conditions (student protection plans, access and participation plans and consumer law) in a short period of time.

Question 26 - Do you have any comments on the above proposal of how the OfS will act as the principal regulator for exempt charities?

Question 27 - Provided that the Secretary of State considers OfS regulation is sufficient for these purposes, should exempt charity status apply to a wider group of charitable higher education providers? In particular, considering that providers in the Approved categories will be subject to conditions relating to Financial Sustainability, Management and Governance, and the provision of information (as set out in the Guidance), do you have any views on whether the OfS's proposed regulation of providers in these categories would be sufficient for the purposes of it carrying out the functions of Principal Regulator?

NOTE: There were no metrics captured for this question in the consultation – qualitative responses only. Responses to questions 26 & 27 are grouped into a single response below.

Respondents were broadly supportive or neutral regarding the proposals on how the OfS would act as principal regulator for exempt charities, and on how this should apply to a wider group of charitable higher education providers. Respondents welcomed the reduction in burden caused by registered higher education providers that are exempt charities not being required to make duplicative returns to both the OfS and the Charity Commission.

Respondents also acknowledged that the OfS would have the regulatory oversight to perform the role of Principal Regulator effectively over providers in both of the Approved categories of the register, and welcomed that the widening of this oversight, as compared to HEFCE's, would open opportunities for more eligible providers to gain exempt status in future.

Some respondents raised a few issues and concerns, and requested:

- further detail and consultation
- more Charity Commission involvement
- clarification about the status of for-profit providers

- further thought to be given on possible conflicts of interest caused by either the OfS being both higher education regulator and Principal Regulator; or between the Charity Commission and the OfS as charity regulators.

DfE Response

DfE can confirm higher education providers will only be eligible for exempt charity status if they can meet the legal definition of a charity. To do this, they must be established for exclusively charitable purposes for the public benefit, not for private profit.

DfE is already undertaking further work with the Charity Commission, the OfS and the Department for Digital, Media, Culture and Sport (DCMS) on how these proposals might work in practice. This includes focusing on how exempt status and the role of the OfS as Principal Regulator will work in future. As this progresses, there will be further engagement with all interested parties including the sector as necessary, and the issuing of further updates to the sector as detail becomes clearer.

The outcome of this further thinking will allow further secondary legislation to be drafted to enable the OfS to carry out the Principal Regulator function on a new basis, following the end of the transition period, during which time the OfS will have carried out the Principal Regulator function on the same legal basis as HEFCE. Subject to parliamentary approval, the OfS expects that this new secondary legislation will take effect from the 1 August 2019, and will allow a new basis for higher education providers, so far as they are charities, to hold exempt charity status, as enabled by the commencement of the new OfS Regulatory Framework.

Concerns about a possible conflict of interest were raised by a number of respondents, in relation to the OfS having a dual role as higher education regulator and principal regulator. This dual role, however, would enable the OfS to reduce regulatory burden on charities that are registered higher education providers.

Arrangements will need to be made between the Charity Commission and the OfS on how respective roles will work together, particularly in light of the fact that, whatever powers the OfS may have as the higher education sector regulator and Principal Regulator, exempt charities will continue to be subject to charity law. As Principal Regulator, the OfS will have a duty to promote compliance with charity law by the exempt charities it regulates. The OfS and the Charity Commission are already engaging on this matter.

Annex A: List of organisations that responded to the consultation

The following organisations responded to our consultation, as well as a number of individuals and organisations who asked that their responses remain confidential.

Aberystwyth University

Academic Quality Management Ltd

Academic Registrars' Council

AECC University College

Altain Education

AMOSSHE - The Student Services Organisation

Anglia Ruskin University

Antisemitism Policy Trust

APC Futures Ltd

Arden University

Arts Students' Union (UAL)

Arts University Bournemouth

Ashridge (Bonar Law Memorial) Trust

Association of American Study Abroad Programmes United Kingdom (AASAP/UK)

Association of Colleges

Association of Electoral Administrators

Association of Graduate Careers Advisory Services (AGCAS)

Association of Heads of University Administration (AHUA)

Aston University Students' Union

Bath College

Bath Spa University

Bath University

Bedford College Group

Belfast Bible College

Berkshire College of Agriculture

Birkbeck, University of London

Birmingham City University

Birmingham City University Students' Union

Birmingham Metropolitan College

Birmingham University

Bishop Grosseteste University

Bishop Grosseteste Students' Union

Bournemouth University

Bournemouth University Students' Union

BPP University

Bradford College

Brightside

Bristol Baptist College

Brit College Limited

British Accreditation Council

British Universities Finance Directors Group

Brunel University London

Cambridge University

Cambridge University Students' Union

City & Guilds of London Art School

City College Plymouth

City, University of London

Cleveland College of Art & Design

Cliff College

Committee of University Chairs

Competition and Markets Authority (CMA)

Conservative Party

Conservatoire for Dance and Drama

Council for Higher Education in Art and Design

Council for the Defence of British Universities (CDBU)

Council of Higher Education Internal Auditors (CHEIA)

Council of Osteopathic Educational Institutions

Courtauld Institute of Art, University of London

Coventry University Group

De Montfort University

De Montfort University Students' Union

Driver Youth Trust

Durham University

Durham University Students' Union

Edge Hill University Students' Union

Edinburgh Theological Seminary

Electoral Commission

Empire College London

Equality Challenge Unit

European Access Network

Exeter University

Financial Sustainability Strategy Group (FSSG)

Foundation for International Education

Free Churches Group

Frontier Economics

General Osteopathic Council

Goldsmiths Students' Union

Goldsmiths, University of London

Greater Brighton Metropolitan College

GSM London

GuildHE

Halesowen College

Harper Adams University

Hartpury College and University Centre

Havering College of Further and Higher Education

Health and Care Professions Council

Hereford College of Arts

Hertfordshire Students' Union

Heythrop College

Higher Education Academy

Higher Education Funding Council for Wales

Huddersfield Students' Union

Hult International Business School

Imperial College London

Independent Higher Education

Institute for Teaching

Institute of Chartered Accountants in England and Wales (ICAEW)

Institute of Contemporary Music

Institute of Development Studies

Institute of Education - Wolverhampton University

IntoUniversity

Jisc

Kaplan International Pathways

Keele University

Keele University Students' Union

Kent Students' Union

King's College London

Kingston University

KLC School of Design

Lancaster University

Le Cordon Bleu Limited

Leadership Foundation for Higher Education

Leeds Beckett University

Leeds Trinity University

Leeds University

Linking London

Liverpool John Moores University

London academy of music & dramatic art (LAMDA)

London Business School

London Churchill College

London College of Contemporary Media

London Higher

London Metropolitan University

London School of Business and Management (LSBM)

London School of Economics (LSE)

London School of Hygiene and Tropical Medicine

London School of Management Education

London South Bank University

London South Bank University (LSBU)

London Studio Centre

Loughborough University

LSE Students' Union

LTE Group - The Manchester College

Luther King House Educational Trust

Management of Small Higher Education Institutions Network (MASHEIN)

Manchester Metropolitan University

Manchester Metropolitan University Students' Union

MetFilm School

Middlesex University

MillionPlus

Moorlands College

Myerscough College

National Education Opportunities Network (NEON)

National Union of Students (NUS)

Navitas Holdings UK

Nazarene Theological College

Nelson and Colne College

Nelson College London

Newcastle College Group (NCG)

Newcastle University

North Hertfordshire College

Northumbria Students' Union

Northumbria University

Norwich University of the Arts

Nottingham City Council

Nottingham Trent Students' Union

Nottingham Trent University

Nottingham University Students' Union

Oak Hill College

Office of the Independent Adjudicator (OIA)

Oxford Brookes University

Oxford University Student Union

Pearson College Limited trading as Pearson College London

Pearson Education

Pinsent Masons LLP

Point Blank Music School

Quality Assurance Agency

Quality Assurance Research for Higher Education Ltd

Regent's University London

Regent College Higher Education

Regents Theological College

Richard Huish College

Richmond, the American International University in London

Rose Bruford College of Theatre & Performance

Royal Academy of Arts

Royal Academy of Music

Royal Central School of Speech & Drama Students' Union

Royal Central School of Speech and Drama

Royal College of Art

Royal College of Midwives

Royal College of Nursing

Royal College of Veterinary Surgeons (RCVS)

Royal Geographical Society (with IBG)

Royal Holloway Students' Union

Royal Holloway, University of London

Royal Northern College of Music

Russell Group

SAE Education Limited

Scottish Funding Council

Shakespeare Martineau LLP

Sheffield Hallam Students' Union

Sheffield Hallam University

Solihull College and University Centre

Sotheby's Institute of Art - London

South Devon College

South Gloucestershire and Stroud College

Southampton Solent University

Spurgeon's College

St George's, University of London

St Mellitus College

Staffordshire University

Stonewall

Strode College

Student-Loan-Reductions.org

Sunderland College

Sutton Trust

Teesside University

The Engineering Council

The Academy of Contemporary Music

The Archbishop's Examination in Theology

The Arts Educational Schools

The Institute of Cancer Research

The London Institute of Banking & Finance

The Office of the Independent Adjudicator for Higher Education

The Open University

The Queen's Foundation for Ecumenical Theological Education

The Royal Drawing School

The Salvation Army (William Booth College)

The University of Law

The University of Manchester

Truro & Penwith College

UCFB College of Football Business

UK Lawyers for Israel

UK Standing Committee for Quality Assessment (UKSCQA)

Union of Brunel Students

Universities and Colleges Admissions Service (UCAS)

Universities and Colleges Employers Association

Universities Scotland

Universities UK (UUK)

Universities Wales

University Alliance

University and College Union

University Centre Peterborough

(Peterborough Regional College)

University Centre Reaseheath

University Centre Weston, part of Weston College Group

University College London (UCL)

University College London Students' Union

University of Bath Students' Union

University of Bedford Students' Union

University of Bedfordshire

University of Birmingham

University of Birmingham Guild of Students

University of Bradford

University of Brighton

University of Bristol

University of Bristol Students' Union

University of Chichester

University of Cumbria Students' Union

University of Derby

University of East Anglia (UEA)

University of East Anglia (UEA) Students' Union

University of East London

University of Edinburgh

University of Essex

University of Exeter

University of Exeter Students' Guild

University of Greenwich

University of Hertfordshire

University of Huddersfield

University of Hull

University of Kent

University of Law Students' union

University of Leeds

University of Lincoln

University of Lincoln Students' Union

University of Liverpool

University of London

University of Nottingham

University of Nottingham Students' Union

University of Oxford

University of Plymouth

University of Plymouth Students' Union

University of Portsmouth

University of Reading

University of Roehampton

University of Sheffield

University of Sheffield Students' Union

University of Southampton

University of St Andrews

University of Stirling Students' Union

University of Strathclyde

University of Suffolk

University of Sunderland Students' Union

University of Surrey

University of Surrey Students' Union

University of Sussex

University of Sussex Students' Union

University of Sussex Students' Union

University of the Arts London

University of the West of England, Bristol

University of the West of Scotland

University of Warwick

University of Westminster

University of Winchester

University of Wolverhampton Students' Union

University of Worcester

Unlock - for people with convictions

Wakefield College

Warrington and Vale Royal College

Warwick Students' Union

Warwickshire College Group

Warwickshire College Group (WCG)

West Dean College - The Edward James Foundation

Which?

Worcester Students' Union

Wrexham Glyndwr University

Yeovil College University Centre

York University

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