

## OfS Strategy 2022-2025 Consultation

### Introduction:

The OfS has released a [consultation](#) on its strategy for 2022-2025. The deadline for responses to the consultation is 06 January 2022. This briefing note provides an overview of the proposals within the strategy, and highlights key elements which may impact upon London HE.

### Quality and Standards

- Pursuit of both provider and course level ‘excellent provision’ will increase scrutiny at course, rather than provider, level to consider so-called ‘low quality’ courses. Recent research from the Sutton Trust shows that [London HE providers are the greatest drivers for social mobility in the sector](#) however, courses within institutions where graduate earnings are lower may come under increasing regulatory pressure. This could be of particular concern for London providers given the prominence of creative arts provision in the capital as well as so-called ‘keyworker’ subjects.
- The strategy has a specific focus on awards that are ‘credible and comparable to those granted previously’ and in particular to ‘unexplained’ degree classifications. The strategy does not mention the [context of Covid-19 in recent grade inflation](#), nor does it reference the significant grade inflation overseen by the Department for Education in both 2020 and 2021 at GCSE and A Level. In 2021, [44% of A level awards in England were A\\* or A, as compared to 38% in 2020 and 25% in 2019](#).
- There is an ongoing focus on the government’s free speech agenda to ensure that, ‘providers secure free speech within the law for students, staff and visiting speakers.’ This will be of particular concern for many London institutions, who have seen several high-profile free speech related incidents in recent months, and many of whom have been [named by the OfS](#) as having not signed up to the IHRA definition of antisemitism.
- The strategy makes an explicit commitment to the government’s wider agenda around ‘levelling up’. There is concern that the levelling up agenda represents a ‘levelling down’ for the capital’s higher education institutions, which have already been stripped of the London Weighting [equating to a £64 million loss](#).

### Equality of Opportunity

- The strategy contains a strong focus on Access and Participation, which chimes with the recent announcement from Universities Minister, Michelle Donelan of a ‘reboot’, overseen by the [newly appointed Director of Fair Access and Participation, John Blake](#). London HE institutions are sector leading in this space, although there remain concerns around support for particular groups, including [first in family students](#). In terms of student success, the [ethnicity awarding gaps](#) remain significant across the capital.
- The strategy also encourages HEIs to do ‘much more to work with schools’ on raising attainment, reinvigorating discussions from May’s government. London Higher’s AccessHE division delivers part of [Uni Connect across London](#) and supports this work through a range of school-university collaborations.
- Student choice is mentioned as a focus for the strategy’s latter years. There is also a single line reference to the introduction of the Lifelong Learning Entitlement (LLE), linked to increasing the diversity of provision available.
- The strategy commits to ‘taking effective action to address and prevent sexual harassment and misconduct,’ in particular to building an evidence base in this space and using the softer regulatory

powers available to the OfS to convene, influence and publicise on the issue. This aligns with wider [work by the GLA to make the capital safer for women and girls](#). London Higher's EDI Network are seeking to convene members to address this in early 2022.

- There is also a commitment to considering whether providers are effectively addressing and supporting student mental health and wellbeing. London Higher has recently launched [Wellbeing Connect](#) a dedicated online tool which allows students and staff to find appropriate NHS services in their area quickly at the time that they need them.

### Enabling Regulation

- The consultation reiterates the 'risk based' approach the OfS has previously articulated, anticipating that for those 'low risk' providers, regulation will be lighter touch.
- There is a pledge to reduce the oft discussed regulatory burden for institutions however, this includes a framing of all institutions being asked to rewrite Access and Participation Plans halfway through the current five year cycle as 'reducing burden'.
- There is mention of reviewing C conditions, suggesting an increased focus on student protection in the coming years.

### Broader Thoughts

- The strategy bears strong similarity (in contrast to Lord Wharton's introduction!) to its [predecessor](#) with a stronger focus on the rhetoric of low quality provision.
- There are clear echoes of wider government policy; levelling up, freedom of speech, low value courses, access and participation and mental health all get airtime. There is little new content for the sector to respond to, but rather a doubling down on previous messages coming out of DfE and OfS.
- This consultation has been released at a time of significant senior staffing change for the OfS, with both Chris Milward and Nicola Dandridge leaving their roles, and the new Free Speech Champion set to be appointed. This seems a strange time to be setting the direction for the next three years before appointing these figures, and the sector can expect further amendments once the new appointments have their feet under the table.
- There appears to be a lack of acknowledgment for the state of flux within the sector and the many moving parts yet to be addressed; Augar, TEF, LLE B3 consultation and the access and participation 'reboot' will all have significant influence on the next three years.
- There is a clear sense from the OfS that we are 'transitioning out of the early stages of the pandemic', signaling a move towards 'business as usual', which seems particularly untimely given the rising Covid rates. In addition, there must be recognition that [universities will be supporting students who have suffered significant disruption to their education for many years to come](#).
- There is a repeated line in the strategy supporting so called 'sandbox activity' to support innovation in different areas across the sector which may provide a much-needed route for experimentation.

#### Further Information:

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