

Certified



Corporation

SHIFT  
INSIGHT

# Report for the Office for Students: engagement and communications

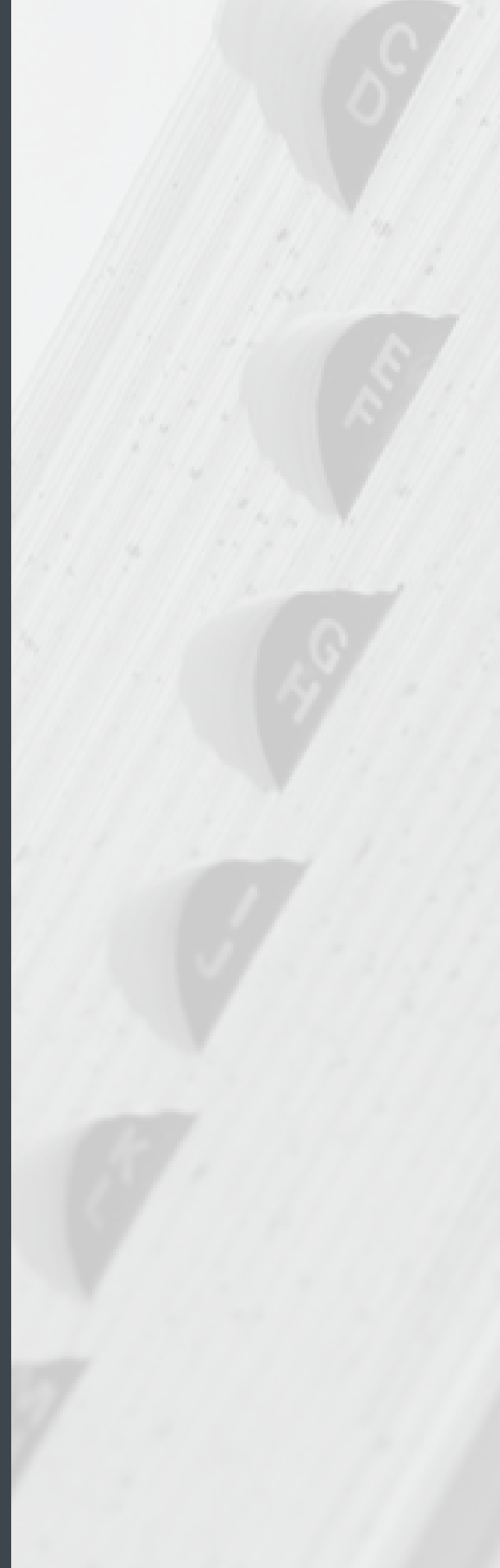
Written by Sophie Renken, Matthew Wood and Jane  
Powell

[WWW.SHIFT-LEARNING.CO.UK](http://WWW.SHIFT-LEARNING.CO.UK)

SHIFT  
LEARNING

# Contents

Executive summary .....	3
Key findings .....	6
Perceived changes in the OfS's engagement approaches .	9
Perceptions of specific types of OfS engagement .....	13
What do providers want to see more of in future? .....	22
Conclusion .....	23
Appendices.....	25
Appendix A: Background and methodology .....	26
Appendix B: Profile of respondents .....	28
Appendix C: Sources of regulatory information .....	30
Appendix D: Responses to technical communication.....	31



## **Executive summary**

## Background and methodology

Over the last 18 months, the Office for Students (OfS) has made changes to its engagement and communication channels with higher education providers in England. Shift Learning conducted 44 interviews with representatives from registered providers to understand how these changes have impacted their perceptions of the OfS's communication and engagement approaches.

## Perceived changes in OfS engagement approaches

**The majority of participants recognised changes in OfS communication approaches and felt that there had been overall improvement in the quality of engagement.** Participants were asked to rate the quality of OfS engagement two years ago and their current experiences, on a scale of 1-100 where 100 is 'completely where you would like the OfS to be'. Respondents indicated on average that two years ago, their rating would have been 38 out of 100 but that their rating was now 55 out of 100, suggesting a notable perceived improvement over this time. Over half of participants said that the OfS had got 'somewhat better' in terms of the way in which it engages with the sector.

**Changes made to OfS communication channels were generally received positively, as a step towards greater engagement with the sector.** However, many participants felt that there was further room to build on these improvements. Participants largely saw OfS communications as functional and informative but felt there was a lack of opportunities for dialogue, which was seen as fundamental to developing two-way engagement.

**In general, there were differences in perceptions of positive change between those participants who had an opportunity for direct, human contact with OfS staff,** who were considered helpful, and those who had encountered issues to which OfS responses had largely been via email. Perhaps relatedly, the OfS made a positive impression where it was seen to have listened to and taken on board providers' suggestions.

Key findings around the perceived strengths, weaknesses and possible improvements identified by participants included:

### Areas of strength

- Improvements in the tone of communications, becoming more personal and less directive.
- Increased visibility of OfS staff through OfS and sector events, quarterly webinars and provider visits.
- Increased variety of engagement options, providing good access to information in various formats.
- Regular email updates, which were seen as providers' most trusted source of regulatory information.
- Greater clarity in email communications.
- Helpful and supportive OfS staff, when meeting with providers to resolve issues.

### Areas of weakness

- Communication channels were felt to provide limited opportunities for providers to ask questions, share their thoughts or engage in meaningful two-way dialogue.
- A one-size-fits-all approach to communications was seen to illustrate a lack of understanding of the diversity of providers within the sector.
- The tone of communications was seen as inconsistent, occasionally taking on a more punitive style.
- Delayed responses and a lack of support when seeking clarifications were sometimes perceived as creating a double standard, where providers were held to more rigid deadlines than the OfS.
- The content and style of communications were sometimes felt to be overly political.
- Some providers struggled with the volume of communications, particularly smaller institutions.
- Consultations were seen as complex and time intensive, with some questioning the extent to which their responses impacted decision-making.

## Key areas for improvement

- Provide more opportunities for meaningful dialogue, by creating time for unstructured questions and discussion.
- Tailor communications to different provider types, by segmenting communications to ensure information is relevant and digestible.
- Create opportunities for more informal communication channels to enable providers to seek clarification.
- Review the tone employed across communications, to improve consistency.
- Review technical documentations, for accessibility.

## Key findings

## Background and introduction

The OfS commissioned Shift Learning to conduct research to explore current experiences of the regulator among providers, and to understand which aspects of its communication and engagement activities are working well and which could be improved. This research follows up from an earlier report into provider perceptions published by Shift Learning in 2022, which prompted many of the changes made over the last 18 months (see [Appendix A](#)).

## How do providers hear about regulatory changes?

Participants were asked how they hear about the OfS's regulatory expectations to understand which channels were most frequently used by providers, and the extent to which they received this information directly from the OfS. Of the 44 interviews conducted, the proportion of participants who consulted the various sources is as follows (see [Appendix C](#) for further details):



Direct mail from the OfS  
**40 of 44 participants**



Sector media  
**32 of 44 participants**



Mission groups and sector bodies  
**32 of 44 participants**



OfS web alerts  
**25 of 44 participants**



National media  
**24 of 44 participants**



Social media  
**22 of 44 participants**

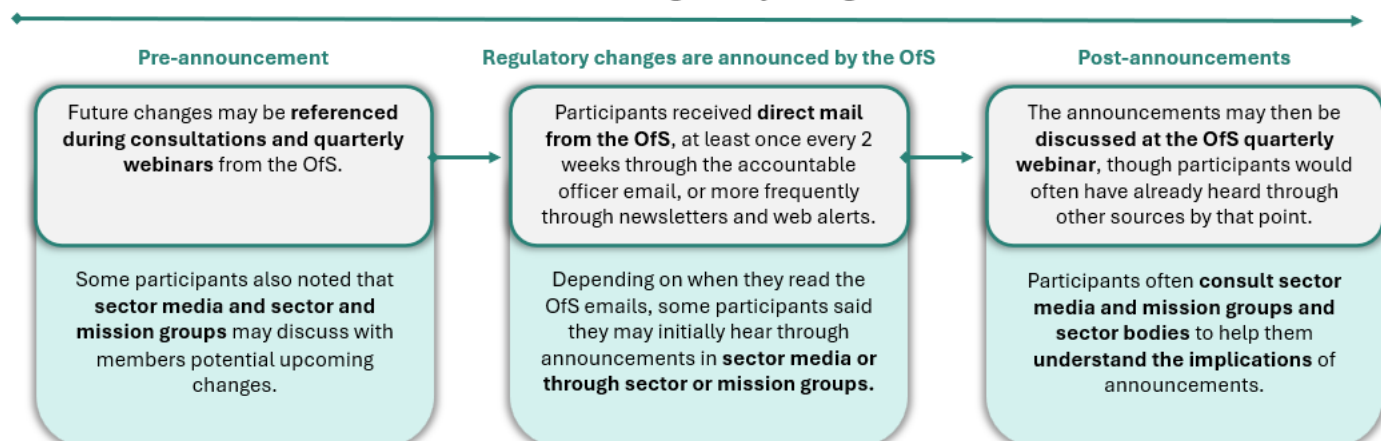


OfS Quarterly webinars  
**19 of 44 participants**

## How do they first become aware of regulatory changes?

The order in which providers hear about regulatory changes may have a bearing on how that news is received. Participants generally first heard about changes directly from the OfS, via email, and considered this their most trusted source. However, external sources – such as sector media, and sector body and mission group updates – were often quick to follow, with some participants noting that they occasionally heard through these sources first. Following announcements, participants often sought out these external sources for analysis of changes and what they could mean for their provider.

## Timeline of regulatory changes



## Information prior to official changes in regulation

Leading up to regulatory changes, participants often mentioned they would already have some understanding of what changes were likely to come into effect, so were rarely surprised by new regulation. Several participants mentioned having heard about potential changes discussed in sector and mission groups as areas to ‘have on their radar’. The OfS consultation processes and quarterly webinars were also noted as a means by which future changes were introduced. Both OfS and external communications, therefore, were seen to pave the ground for regulatory changes, helping to give providers a sense of what to expect, and give them time to ‘warm up’ to changes.

## Direct from the OfS

Most participants first heard about regulatory changes directly from the OfS, via direct mail or web alerts. While announcements were often quickly followed by information from external sources, several participants noted that OfS communications were their most trusted sources – and that they would not consider announcements to be official until they had heard them directly from the OfS. Direct mail from the OfS in particular was cited by many as the primary means by which they would first hear about regulatory changes, either through the fortnightly accountable officer emails or weekly newsletters. Lower awareness and use of web alerts meant that direct emails were often participants’ first opportunity to hear about changes from the OfS. However, some noted that social media, particularly OfS LinkedIn updates, was a useful source for keeping up to date, as well as prefacing potential upcoming changes.

## Indirectly, through external sources

### Sector and national media

While participants would sometimes hear about regulatory changes through national media, several noted that these sources could sensationalise the impact of any changes so were largely treated with scepticism. However, several participants mentioned that when they saw regulatory announcements from the OfS, they would often go straight to sector media sources for analysis. Sector outlets were often viewed as a tool to help them interpret changes and unpack the significance of regulatory announcements within the wider higher education landscape in a digestible format.

### Sector bodies





Participants stated that sector bodies and mission groups often send out communications on regulatory changes seemingly simultaneously with OfS announcements and, as one or two noted, sometimes before. A large range of mission groups and sector bodies were mentioned by participants as sources of information, including Independent Higher Education, GuildHE, the University Alliance and the Russell Group. Several participants highlighted the value of these announcements, as they were more focused on the **implications** of changes for their member providers, so were seen to provide more directly relevant information with more specificity to provider type. These groups were also seen to provide a valuable forum for discussing the significance of changes and, in some cases, formulating a response. More proactive early engagement with sector groups by the OfS over the last 18 months may have contributed to the success of this channel.

We're a member of IHE [Independent Higher Education], and they will send regular emails back when there's an update from the OfS that needs us to do something. They'll usually have a response, and they'll put together a webinar discussing what our response might be.

Accountable officer

## Perceived changes in the OfS's engagement approaches

### How happy are providers with current engagement approaches?

Participant satisfaction with the OfS's current engagement in the sector was on average moderately positive. When asked to rate their happiness with the OfS's current engagement on a scale of 1-10, 6 was the most common score given by participants, with an average score of 5.5 out of 10. **Over half of participants gave a score between 5 and 7**, as shown below.

Figure 1: Ratings out of 10 when asked about OfS engagement

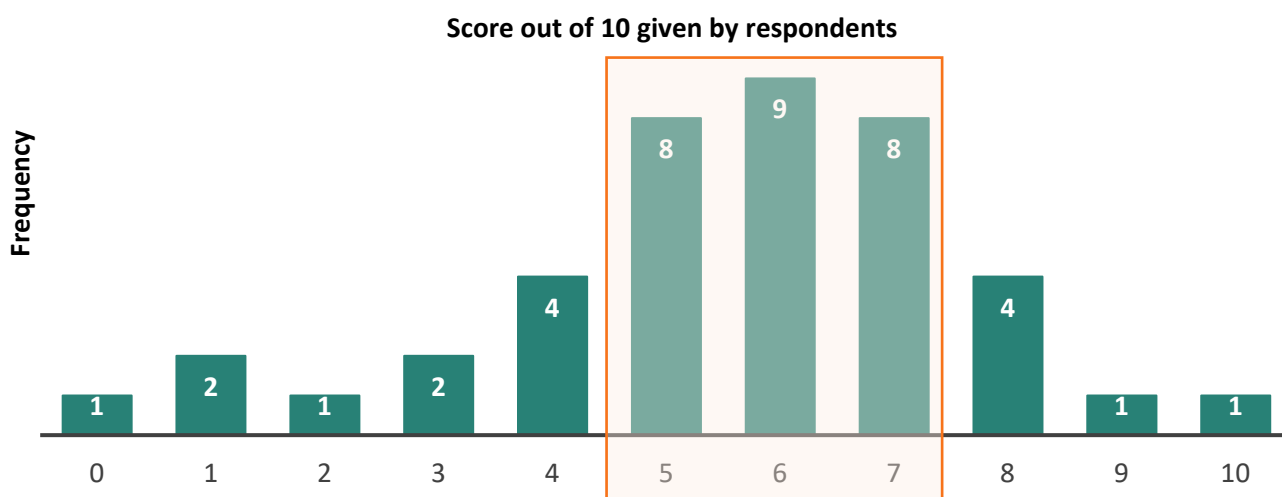


Figure 1 shows responses to the question: 'Overall how happy are you with the way the OfS engages with you and your provider, on a scale of 1 to 10.' This includes responses given from 41 interviews of the 44 conducted. Three participants gave non-specific responses. Two-person interviews are counted once, as these participants agreed on scores. Base n = 41.

Often, participants attributed a 'mid-range' score to a sense there had been overall improvements in OfS communications, but these sometimes fell short of delivering the added value that participants hoped for. Some key changes introduced by the OfS – such as the quarterly webinars, one-to-one visits to providers and named contacts – were generally seen as a step in the right direction but some participants felt they had not dramatically shifted the overall tone or nature of the OfS's engagement with providers.

### Positive aspects of OfS engagement

Participants highlighted a number of key strengths in the OfS's current communications approaches, including:

- a. **Several participants felt the tone of communications had improved** – some felt there had been an effort within the OfS to adopt a more positive, understanding manner, and a less anonymous style by including the name of accountable officers and a named contact within the accountable officer email.
- b. **The OfS was seen to have increased its visibility within the sector** – some felt that an effort had been made to engage more with the sector, as seen through greater presence of OfS staff at sector events, as well as visits to providers, the quarterly webinar and strategy workshops.
- c. **Many felt the OfS provided good access to information** – the availability of information in a variety of formats, through longer, more detailed written documents, alongside shorter summaries and webinar updates, was seen as positive. Some also noted greater clarity around deadlines in email communications.
- d. **The regularity of information was seen as helpful** – weekly, fortnightly and monthly updates were seen to provide a consistent stream of updates at reliable times, which participants found useful.
- e. **Positive direct engagement with OfS staff was strongly linked to positive perceptions of the OfS more broadly** – those that had interacted directly with OfS staff often found them friendly and helpful, especially during face-to-face or online meetings, which were largely seen as clarifying and reassuring.

I think they're diligent in making sure we know what we need to know, making sure that's shared through multiple different channels, through the webinars, through quarterly updates, through the website. The information is absolutely there.

Accountable officer

## Critiques of current approaches

Participants were critical of the following aspects of the OfS's current engagement approaches:

- a. **Engagement was seen as being very one-way and somewhat superficial** – despite the introduction of more engagement activities, many participants did not feel they had sufficient opportunity to ask questions or share their thoughts. Some found these activities inflexible and heavily directed by the OfS, which they felt limited opportunities for open dialogue.
- b. **Some felt the style of communication did not convey an understanding of the differences between providers** – some felt that OfS took a 'one-size-fits all' approach to communication, which gave the impression of a lack of understanding of the range of provider types within the sector, with communications generally seen to be more geared towards large universities.
- c. **The OfS was not always seen to stick to its own deadlines, and participants felt it could be slow to respond to queries** – some participants commented that, while providers were often given rigid deadlines for responses, the OfS did not always meet its own for publishing information.
- d. **Some still found the tone of communications impersonal and punitive** – improvements to the tone of communications were seen as inconsistent, especially between email communications, which were sometimes seen as generic and standoffish, and direct conversations with OfS staff, which were often felt to be more open and supportive.
- e. **Some felt the tone and content of communications conveyed government bias** – letters sent to accountable officers, notably relating to free speech, were criticised, as they were seen as accusatory, unhelpful and directed by government talking-points.
- f. **Several participants struggled with the volume of communications** – the frequent and untailed nature of communications was sometimes seen to create administrative burden for providers.
- g. **Some felt there was a lack of support around clarifying regulation** – language used in technical guidance documents and the regulatory framework was sometimes seen as inaccessible, which could create ambiguities that were exacerbated by the difficulty of getting direct answers to questions.

We received a series of letters over various issues... the sector felt they were naughty institution letters, very disrespectful of institutions.

Senior leadership position

## To what extent have providers seen changes over the last two years?

### Most participants felt that OfS engagement had got ‘somewhat better’

Most participants had observed changes in the way the OfS engages with the sector over the last two years. Overall, the majority of participants felt there had been positive changes in engagement approaches, including improvements in the quality and clarity of communications.

Figure 2: Responses on perceived change in OfS engagement

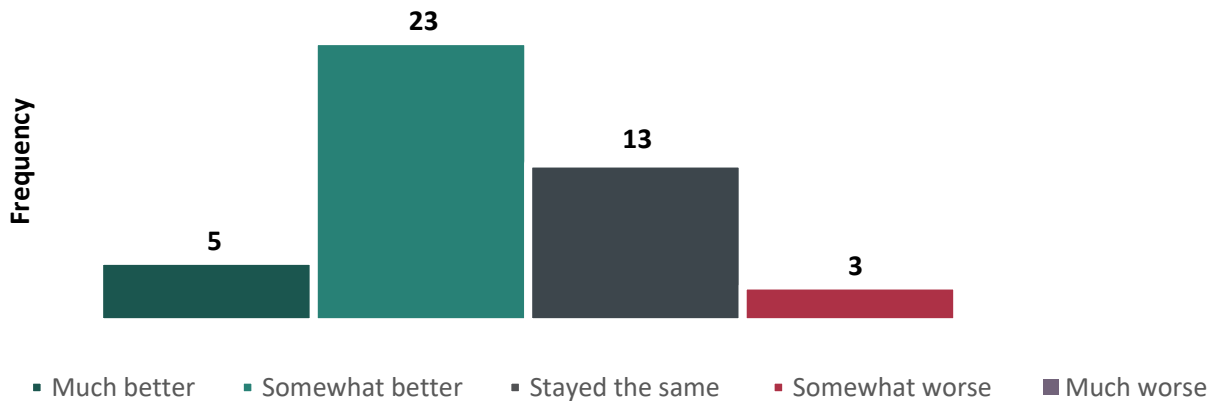


Figure 2 shows responses to the question: ‘Over the last 18 months would you say OfS has got much better, somewhat better, stayed the same, somewhat worse or much worse in terms of the way in which it engages with the sector’. Base n = 44.

The majority of participants felt that engagement had improved, with the second largest proportion feeling that it had stayed the same. A small number thought it had got slightly worse, but no one felt it had got much worse.

This finding is further validated by responses to a second question, where participants were asked to rate the quality of the OfS’s engagement with them on a scale of 1 to 100, where 100 was where they ‘wanted the OfS to be’.

Participants were asked to rate the OfS’s current performance and to imagine they were rating the OfS two years ago.

Figure 3: Responses on perceived quality of OfS engagement, current and two years ago



Figure 3 shows responses to the question: ‘Think of a line between zero and a hundred, where 0 is awful and 100 is 100% or completely where you would like the OfS to be, where would you place the quality of OfS’s engagement with you now?’ They were also asked to say what answer they would have given to this question if asked two years ago. Current rating base n = 44; Rating 2 years ago base n = 40.

Figure 3 shows a general improvement in the perceived quality of OfS communications, with the average rating increasing from approximately 38% two years ago to 55% now. Moreover, more than three quarters of participants said they would have given a score of less than 50% two years ago, as opposed to less than half currently.

These responses are suggestive of a general upward trend in provider perceptions of the OfS's engagement approaches. However, this change was not consistent across all participants.

Those who felt that communications had become **somewhat or much better** largely attributed this to:

- the introduction of the quarterly webinar, one-to-one visits to providers and greater presence of OfS staff at sector events, which they felt evidenced a desire to have greater visibility and engagement with the sector
- a shift in tone of communications, which they felt were becoming somewhat more personalised and less punitive
- positive direct engagement they had with OfS when dealing with a regulatory matter or query
- changes to the accountable officer emails, particularly the inclusion of deadlines, which was seen to have improved clarity.

Those who felt communications had largely **stayed the same** often attributed this to:

- a feeling that the new and updated communications channels introduced (i.e. quarterly webinars, provider visits, named contacts) were largely symbolic and did not ultimately improve engagement with the sector or provide opportunity for meaningful dialogue
- the consultation process, which, despite changes, was still seen as lengthy and burdensome for providers, who sometimes did not feel their feedback ultimately made a difference
- negative regulatory experiences with the OfS – where participants felt that issues were poorly handled, and which undermined the perceived improvements in tone and approach
- a feeling that the OfS was still too influenced by the priorities of government to have undergone any meaningful change.

Those who felt their engagement with the OfS was **somewhat worse** largely attributed this to:

- specific negative experiences they had had with the OfS within the last 18 months, citing long delays and limited responses to their communications.

## Positive direct engagement had a notable bearing on the perceived quality of OfS engagement

The extent to which participants had some form of positive direct engagement with the OfS was often closely linked to how happy they were with their engagement with the OfS overall. Those participants who had an opportunity to speak directly with OfS staff over an issue or concern often found those interactions to be supportive and helpful, welcoming the chance to have more open and frank conversations. However, those who had encountered issues to which OfS responses had largely been via email – where a few participants had encountered long delays and a seemingly 'standoffish' tone – were much more negative about OfS engagement overall. This highlights the importance of opportunities for direct, two-way, human interaction in improving how providers view the quality of OfS engagement.

I don't want to feel I'm in a crisis to be engaged with the regulator... from the comms experience I had because of a particular situation, I personally feel much more confident that I can go directly to my contact at the OfS to pick something up... If I didn't have this situation I've been dealing with, I wouldn't know where [to rate the quality of engagement] because I wouldn't have had that relationship. All I would be doing is responding to returns and receiving the communications. That would be it.

Accountable officer

# Perceptions of specific types of OfS engagement

## Regular direct emails from the chief executive to accountable officers

**Level of awareness:** High. Many seemed to consider it to be the primary source of information from the OfS, with one participant describing it as ‘the rock in the middle’.

### Strengths identified by participants

- a. Many felt that the email provided a clear and helpful distillation of key information.
- b. Hyperlinks to relevant documents were seen as beneficial, providing easy access to additional information.
- c. The structure of the email into headlines and summaries was seen as useful in helping identify content that was of direct interest to different audiences in the provider, so it could be distributed to relevant individuals.
- d. Some participants emphasised how the email was action-based. One participant described it as their ‘to-do list’, highlighting current areas of change and attention.
- e. Many were positive about the inclusion of upcoming deadlines, which contributed to participants viewing it as more focused and action-based than other email communications.

### Recent improvements identified by participants

- a. The regularity and consistency of the emails was seen as an area of improvement over the last 18 months, with several participants noting how they had become more frequent.
- b. Several noted that they liked that the email outlined a named contact at the OfS.
- c. A few noted that the tone of the emails seemed to have softened in recent years and liked that accountable officers were now referred to by name.

### Areas for improvement identified by participants

The relevance of communications was a key concern, and time spent reviewing, sorting and redirecting it to the relevant individuals was sometimes seen as burdensome, especially for smaller providers.

- a. Several participants suggested that emails should be tailored to specific provider types to ensure their relevance and reduce the need to sift through additional information.
- b. Some participants felt that the emails could be sent to a wider range of roles than just accountable officers, who sometimes had very minimal involvement in actions discussed within them. Several felt that the OfS writing directly to individuals with responsibility for different areas of operation (e.g. information on financial returns sent directly to institutional finance leads) would ensure more consistent access to information and reduce the additional workload required in redistributing these emails internally.
- c. Some participants felt that the emails could be more concise, as they sometimes repeated content from previous emails – though some clarified that they would rather have repetition than missed information.
- d. Some participants felt that the tone of the emails could be further developed, to avoid sounding punitive or transactional.
- e. Despite the inclusion of a named contact, several participants noted that the email address attached to this contact was to a generic inbox (regulation@) and indicated a preference for a direct email address.

## OfS digital channels, including the OfS website, alerts and newsletters

**Level of awareness:** High. These were widely used and were largely seen as a valuable means of keeping up to date.

### Strengths identified by participants

- a. The website was identified as a particular area of strength by many participants, providing a useful repository of information. Several described it as easy to use.
- b. Digital channels were seen as a helpful way of keeping individuals across providers updated.
- c. Many participants found it helpful that everything in the emails linked back to the website, so it was clear where they could refer to for clarification.
- d. Several noted that the regularity and volume of emails meant they felt they were unlikely to miss key updates, which some found reassuring.
- e. The availability of data from the website and newsfeed page were noted as positives.
- f. A few noted finding the 'what you have missed' emails especially helpful.

### Recent improvements identified by participants

- a. A few commented on a perceived shift in tone in these communications, which they felt were becoming more collaborative.
- b. One participant thought that email updates felt more 'specific'.

I think the roundups have become more frequent, and again the tone has improved. There's more of a collaborative tone and less of a strict tone... the roundups are extremely helpful because you hear information more than once, which is quite reassuring, and key dates more than once. You're not caught out. The language and presentation is easier to access.

Senior leadership position

### Areas for improvement identified by participants

- a. Some felt that the volume of communications could be more streamlined, especially for smaller providers with fewer individuals to process the information.
- b. A few participants recommended clearer signposting to distinguish new information from reiterated content, making it easier to identify new areas of focus.
- c. A few participants felt it would be beneficial to make newsletters more action-oriented, similar to the accountable officer emails, to increase their value. Sending communications earlier in the week as opposed to on Friday afternoon was desired by some participants.
- d. One participant suggested making the process of uploading documentation to the website more intuitive and user-friendly.
- e. One participant felt that tailoring website content to differentiate between different kinds of providers would make it easier to find relevant information.

## Quarterly webinars from the chief executive to accountable officers

**Level of awareness:** High, even though some had not attended these (noting not all participants were accountable officers).

### Strengths identified by participants

- a. Several participants praised the opportunity for Q&A and felt this demonstrated an increased commitment within the OfS for greater visibility and more human interaction with providers.

- b. Some noted that while the content was often closely reflective of the regular emails to the accountable officer, they welcomed the opportunity for more personal engagement.
- c. Several participants commented that it provided a useful summary of key information.
- d. A few participants were positive about the opportunity to hear directly from the OfS about current challenges and objectives in the sector, and felt it was a useful 'forecast' for future updates.
- e. A few participants liked that they could also hear from other individual OfS staff members, alongside the chief executive, to learn more about their particular area of operation.

The ones I went to were useful, and that's an example of the visibility we would want. The chief executive engaging with organisations is really a positive move.

Senior leadership position

## Areas for improvement identified by participants

- a. Many participants suggested dedicating more time within webinars to interactive communication, including more comprehensive Q&A sessions.
- b. Many felt that leaving more time to hear from providers in a less scripted, formulaic format would make this a much deeper form of engagement.
- c. To better differentiate their value from other OfS communications, some participants suggested that webinars should cover new content distinct from the accountable officer's emails.
- d. Offering multiple webinars tailored to specific provider types was recommended by several participants, to make the content more relevant and beneficial to a wider range of institutions.
- e. A few participants recommended increasing flexibility around attendance, allowing other representatives to join if the accountable officer is unavailable.
- f. A few suggested providing multiple sessions or recordings for those with scheduling conflicts.

## Direct or individual engagement from the OfS about regulatory matters

**Level of awareness:** High. Many participants had experienced this form of engagement.

### Strengths identified by participants

- a. Most participants who had directly engaged with the OfS found staff to be kind, helpful and supportive.
- b. A few described significant issues or challenges their provider had encountered and found the OfS team who supported them to be open, understanding and willing to engage.
- c. These participants also noted that this experience had made them more confident in reaching out to the OfS directly in future.
- d. Face-to-face or online meetings were seen as a particularly useful means for clarifying regulation.

### Recent improvements identified by participants

- a. A few participants noted that they felt the turnaround for email responses had improved, reducing from two to three days to generally within 24 hours. However, due to the specific nature of direct engagement, some participants felt that they could not compare experiences across years.

## Areas for improvement identified by participants

- a. A few participants would like to see more prompt acknowledgements and timely responses when reportable events are submitted, to provide assurance that their emails have been received and to outline next steps.

- b. A few participants recommended providing a direct phone number for urgent queries, as they found that speaking to an individual directly often led to quicker resolutions compared to email communications, which were sometimes felt to be legalistic or scripted.
- c. A few participants felt that, as far as possible, providing a consistent contact when dealing with a single issue would improve their experience, as they would not need to explain the issue multiple times. They felt their named contact could perform this function as they would already understand their providers' context.
- d. One participant felt there should be more clarity around the distinction between allowed support and guidance that might be seen to amount to 'coaching'.

## OfS events

**Level of awareness:** Mixed. Many were aware of and had attended more recent OfS events, particularly highlighting the recent OfS strategy regional workshops. A few participants were aware of the 'Introduction to the OfS' events, but few had actually engaged with them – though some had recommended colleagues attend. Several participants were not aware of any recent OfS events.

## Strengths identified by participants

- a. Those who engaged with OfS events were particularly positive about the opportunity to speak directly with OfS staff, which they felt demonstrated an openness and willingness to engage with providers.
- b. They particularly valued in-person events and the opportunity to open up conversations with the OfS and other providers, to share best practice.
- c. One participant noted that they liked that some events were live-streamed, as it made them more accessible.
- d. One participant felt that the teaching excellence framework and access and participation events had provided them with some useful resources.

## Recent improvements identified by participants

The recent regional strategy workshops were discussed by several participants:

- a. They were felt to be well-structured, interesting events, providing an ideal opportunity to focus on the future of the sector.
- b. The number of OfS staff in attendance, in both junior and senior positions, was seen as positive, as was their openness to engage.
- c. Participants also liked that these were regional events, which made them both easier to attend and allowed greater focus on key objectives and challenges within their region.
- d. The use of technology to pull out key themes was seen as useful.

It felt genuine that individuals were willing to meet with us and seek our views, and it [the strategy workshop] was a well-constructed event. There was an emphasis on seeking insight and viewpoints directly from providers sat at tables mixing with each other, and OfS were in listening mode, and not seeking simply to put forward a decided point of view, a pre-decided approach.

Senior leadership position

## Areas for improvement identified by participants

- a. Some participants suggested hosting more face-to-face events in various regions beyond London and Bristol to improve accessibility for all providers.
- b. Some participants would like more hybrid attendance options, so they are able to contribute even if they could not spare the time or expense of travel.
- c. A more consistent schedule of events was recommended by several participants, along with extending deadlines for associated bids or submissions if related briefing events are cancelled.



## OfS webinars

**Level of awareness:** The majority of participants were aware of and had engaged with regular OfS webinars. Webinars mentioned by participants concerned international student visas, access and participation plans, freedom of speech and condition B3.

### Strengths identified by participants

- a. Webinars that addressed particular topic areas (e.g. access and participation plans) were seen as a useful source of information and clarification.
- b. Q&As were a key selling point of webinars, seen to complement the information they received via email.
- c. A few participants felt that the availability of online recordings was particularly useful, for them to refer back to later.
- d. A couple also found it valuable to be able to send other members of staff from the provider, rather than just the accountable officer, as it allowed those in the most relevant role to attend.
- e. One participant said that useful resources had been made available to them through webinars on the Teaching Excellence Framework and access and participation plans.

### Recent improvements identified by participants

- a. No participants noted specific changes they had observed in relation to webinars. However, several did note that there seemed to be a better variety of communication channels available to them overall, including webinars.

### Areas for improvement identified by participants

- a. A few participants suggested tailoring webinars to address the specific needs and contexts of different provider types, offering greater clarity on how topics affect them.
- b. A few participants suggested extending the time allotted for Q&A sessions, to enhance the opportunities to ask questions and provide feedback on discussed changes.
- c. One participant suggested offering webinars at various times, including evening or early morning options, to accommodate participants' busy schedules.

## OfS attendance at sector events hosted by others

**Level of awareness:** High. Most participants were either aware of or had attended talks by the OfS at sector events. These included events hosted by GuildHE, the Mixed Economy Group, the Association of Colleges, Universities UK, London Higher, Independent Higher Education and the Higher Education Policy Institute.

### Strengths identified by participants

- a. Many participants described OfS speakers as open, honest and willing to engage.
- b. Conversations could be tailored more to their context and needs, which was seen as highly valuable.
- c. This was also seen as an important means by which the OfS could develop their own understanding of the diversity that exists between providers.
- d. Opportunities for unstructured, in-the-moment Q&A were seen as particularly beneficial in creating dialogue.

### Recent improvements identified by participants

- a. Many participants noted having seen increased visibility of OfS staff and speakers at sector events, which was seen as a positive attempt to reach out to providers, on their terms.

## Areas for improvement identified by participants

- a. Several participants felt it would add value if OfS speakers remained available after their talks to allow time for follow-up questions and informal conversations – some perceived limiting interaction to formal talks as an attempt to keep providers at ‘arm’s length’.
- b. A few participants felt that staff at these events could be more senior and more fully prepared.
- c. A couple of participants felt the tone used by speakers could be more consistent, as they felt they sometimes could take on a more ‘defensive’ or even ‘hostile’ tone.

## OfS consultations

**Level of awareness:** High. All participants were aware of OfS consultations and the majority had actively engaged in them, either by submitting a provider-specific response or by contributing to a collective response through a sector body or group.

Consultations were the form of engagement that had the most negative perceptions among participants. While a small number of participants noted some small areas of improvement, the majority were critical of their frequency and complexity. They questioned the extent to which their responses had any impact on outcomes.

## Strengths identified by participants

- a. Some participants noted that it was important to have a consultation process, for providers to give feedback on important areas of regulation.
- b. Many participants valued the opportunity to provide a collective response through sector bodies and other groups.

## Recent improvements identified by participants

- a. A few participants had observed efforts within the OfS to reduce the frequency of consultations.
- b. A few felt that consultations were somewhat better planned than previously, and seemed to be on more targeted, specific topics.
- c. One participant felt the OfS seemed to be making more of an effort to explain why its responses to consultations may take time, referencing the consultation on harassment and sexual misconduct, where the OfS expressed an appreciation of the complexity and sensitivity of the topic area.

## Areas for improvement identified by participants

- a. Many participants suggested further spacing out consultations, as they struggled with their frequency and volume.
- b. Many participants suggested making consultation documents less detailed and complex to facilitate easier and quicker responses. The time commitment in responding to consultations was a concern for many participants, particularly those from small providers with less internal resourcing to spare.
- c. Offering clearer guidance on which consultations to prioritise for submitting an individual provider response, rather than a collective response through their sector body or member groups, to help providers use their time more efficiently, as they did not feel able to respond to all of them.
- d. More clearly demonstrating how consultation responses are taken into account in the OfS’s decision-making and providing quicker updates on consultations’ outcomes to reassure participants that their feedback has a meaningful impact.

The consultation on questions included in the National Student Survey was raised by several participants as an example where the OfS’s decision seemed to go against the majority view expressed by providers.

## Named contacts

**Level of awareness:** Mixed. **Within the last 18 months, the OfS has begun to list providers' named contact in the accountable officer email.** Many participants were aware of their contact, highlighting their inclusion in these emails. However, several were unaware of theirs, noting that no-one had ever reached out to them. Some participants had never had any contact, in either direction.

### Strengths identified by participants

- a. Many participants appreciated having a named contact who they could reach out to for guidance on regulatory matters or as a first port of call, if they had queries.
- b. The potential for personalised support from these was seen as a strength, and some felt this was a step in the right direction in terms of developing a more collaborative relationship between the OfS and providers, through greater open dialogue.
- c. A few participants who had interacted with theirs had found them responsive and supportive.
- d. Participants valued the potential for the role to understand their unique institutional and regional contexts, so guidance could be more targeted and they did not need to reiterate contextual information.

### Areas for improvement identified by participants

- a. Many participants would like to see named contacts be more proactive in reaching out and establishing relationships with providers, as a lack of contact led some to assume that they did not have one.
- b. Many felt that offering direct contact details for named contacts, rather than a generic email address (regulation@), would enhance the personal nature of engagement and reassure providers of its confidentiality, as some were wary of revealing knowledge gaps.
- c. Many participants hoped for more informal communication channels with named contacts, particularly for clarifying whether an issue constituted a reportable event.
- d. Improving consistency by ensuring providers interacted with the same named contact for ongoing issues, rather than multiple OfS staff, and providing assurances around response times, was seen as a way to make communication more direct and efficient.
- e. Many participants recommended providing clear guidance on the role of named contacts, including appropriate questions and issues to address with them, as well as clarification on how they are assigned – as some felt regionally-based contacts would be most beneficial.
- f. Some participants suggested that named contacts visit providers to better understand their context and foster stronger relationships.

I think the named contact is a very passive thing. I've never received any correspondence from my named contact at all, so I wouldn't know who they are or what they do in the organisation.

Senior leadership position

## One-to-one visits to providers

**Levels of awareness:** A series of one-to-one visits to providers were **introduced by the OfS within the last 18 months**, with 100 providers visited within the business year. Most participants were aware of one-to-one visits, and several stated their provider had received one. However, around a third were either unaware of them or had never experienced them. A few were unsure whether visits were regulation-related or intended as quality checks of providers. Those who had not been visited would like to have one.

### Strengths identified by participants

- a. Many participants appreciated the opportunity for personal engagement and relationship-building afforded by one-to-one visits, and felt this demonstrated a willingness to listen to providers.

- b. For those whose named contacts had been present during visits, this was seen as particularly beneficial, enhancing contextual understanding and support.
- c. Some participants appreciated the follow-up on issues after the visits.
- d. Several participants felt that their visits gave their provider the opportunity to share their work, achievements, and challenges directly with the OfS.
- e. The OfS's openness to visit institutions in a non-regulatory manner was seen as a positive step towards better understanding the sector and appreciating the diversity that exists among providers.
- f. A few participants found it a good opportunity to 'put a face to the name'.

It wasn't a meeting where they came with a set agenda, other than wanting to meet senior staff and meeting students. They were very much in listening mode in terms of wanting to hear what our issues were and the students' issues were... It wasn't like they had a tick list of things they were checking up on us with.

Senior leadership position

## Areas for improvement identified by participants

- a. Several participants felt there could be more consistency around follow-up to address any issues or concerns raised during visits, contributing to more meaningful, ongoing engagement.
- b. Some participants suggested that more time for visits would enable the OfS to gain a more comprehensive understanding of providers, as well as demonstrating appreciation of their preparation efforts.
- c. Some participants felt that clearer guidance on the purpose of visits, emphasising their non-regulatory nature, would help build trust, as well as offering reassurance that providers are not prioritised based on size or type. A few providers felt that their named contact would be best placed to visit their provider, to build better understanding and a more consistent, ongoing relationship.
- d. A few participants hoped that more senior OfS staff would be included in visits.

## Calls from the OfS regulatory team to new accountable officers

**Level of awareness:** The OfS introduced calls to new accountable officers within the last 18 months. Awareness currently was low relative to other channels. However, some participants mentioned that this might be because they were not the accountable officer, or because they had been in the post for several years. However, a couple could not remember having received a call, despite entering their role less than 18 months ago.

## Strengths identified by participants

- a. Several accountable officers reported positive experiences with the calls they received, finding them useful for synchronous communication and immediate responses.
- b. They were seen as useful for raising initial questions about their role and responsibilities.
- c. Participants felt they provided an opportunity for new accountable officers to engage directly with the OfS regulatory team and have an open discussion about the sector.

## Areas for improvement identified by participants

- a. Many participants recommended improving awareness of the initial calls from the OfS regulatory team, ensuring all eligible individuals know how to arrange one.
- b. A few participants would like to see the OfS establish a more consultative relationship with new accountable officers, providing a clear point of contact and guidance on where to direct future queries, including clarifying details of their named contact.

- c. One participant suggested scheduling the initial call earlier in the appointment process, to provide timely guidance before new accountable officers receive a large volume of information via email.

I reached out on day one of my appointment, and then I subsequently several weeks later got an email to say that [the call] will happen, but at that stage I could have probably benefited from it much sooner.

Accountable officer

## Perceptions of technical communications

Technical communications were seen as important, functional channels, with some participants suggesting improvements, to help make them easier to understand.

Communications Channel	Response
<b>Technical guidance documents</b>	<ul style="list-style-type: none"> <li>• Participants found technical guidance documents robust and easily accessible through the OfS website.</li> <li>• While understanding the need for detailed guidance, some participants would like to see a more 'plain English' tone within these documents and more support available in helping interpret them.</li> </ul>
<b>OfS digitised regulatory framework</b>	<ul style="list-style-type: none"> <li>• The introduction of the digitised regulatory framework was seen positively, as a useful and accessible reference point for themselves and colleagues.</li> <li>• Some participants suggested that more support in understanding how the conditions related to their individual provider's context would be beneficial.</li> </ul>
<b>Grant funding allocation notifications</b>	<ul style="list-style-type: none"> <li>• Most found these communications clear and functional.</li> <li>• Clearer guidelines around response timelines and segmentation of notifications by provider type were seen as a way to improve the clarity of these communications.</li> </ul>

More detail on each of these areas is given in [Appendix C](#).

# What do providers want to see more of in future?

Participants were asked what they would like to see from OfS engagement and communication in future. There was a high degree of consistency in the key themes participants felt would bring about positive change. An underlying concern for many participants was that, while the OfS has made attempts to have greater visibility in the sector, in many cases these efforts did not seem to constitute meaningful, two-way engagement, to foster more mutual understanding. Participants felt that to build a more constructive relationship and improve the effectiveness of regulation, the OfS should consider the following areas:



More opportunities for meaningful dialogue



More tailored communications



A more consistent, collaborative tone



More informal communication channels



More accessible documentation

## Conclusion

This report outlines findings from 44 interviews conducted with accountable officers and senior decision-makers at higher education providers in England, aiming to understand provider perceptions of the Office for Students' approaches to engagement and communications. This follows on from research undertaken in 2022, to understand how provider perceptions of the OfS's communication approaches have changed over this time.

Most participants felt that the quality of OfS engagement approaches had improved over the last 18 months, following efforts within the regulator to introduce and refine several of their communication channels. Increased presence of OfS staff at sector events, quarterly webinars from the chief executive and one-to-one visits to providers were seen to have increased the visibility of the OfS within the sector. This has gone some way to addressing the recommendations of providers outlined in the 2022 report, which called for more personal, human engagement with providers. However, while creating more opportunities for personal interaction, some providers felt these channels could be used to better effect, through more proactive efforts on the part of the OfS to open itself up to feedback and make time for meaningful dialogue with providers.

The tone of OfS communications was a key critique raised by participants within the 2022 research. Many participants recognised a positive shift in tone across OfS communication channels – particularly the accountable officer emails and newsletters, which were their most frequent form of engagement. However, this general improvement was sometimes seen to be inconsistent and, for example, undermined by letters sent to providers which were seen to take on a directive tone without offering support or guidance – participants found this unhelpful and thought it seemed politically motivated. Participants felt ensuring a consistent tone across communications would demonstrate a larger shift in the OfS's relationship with providers, and its commitment to building a more collaborative relationship.

The 2022 research highlighted providers' desire to have a named contact at the OfS, to reduce ambiguities around who to contact for clarification and support. Participants interviewed in this research felt that named contacts could provide an ideal means for establishing dialogue – but this channel's potential was seen to be limited by a lack of proactive engagement from named contacts and a lack of clarity around what the role involved. More direct interaction with these contacts was seen as a key means by which providers and the OfS could build greater understanding, and many participants hoped that this communication channel would evolve into a consistent source of personal, direct engagement.

While participants appreciated the range of communication channels available, they felt their value could be improved by tailoring their content to different provider types. In particular, small providers sometimes struggled with the administrative load involved in digesting OfS communications, and felt they would benefit from more tailored communications that focused on the areas of regulation most relevant to them.

There was a sense among some participants that the volume of regulation was not always met by an equal level of support in helping them understand it and its implications for their providers' activity. Participants suggested the introduction of more informal communication channels as a way to quickly share clarifications and deal with minor issues, to improve understanding while not inflating issues when it is unnecessary. Participants' anxieties around revealing gaps in their knowledge indicates there is room for greater trust to be built between the OfS and providers, to create a more open and transparent relationship.

Participants hoped that the OfS would continue to show its commitment to providing more opportunities for direct interaction and further developing the chance for dialogue. Demonstrating an understanding of providers' needs through tailored communications, which recognise the sector's diversity – alongside clear, accessible guidance and timely support – were seen as key ways the OfS and providers could work together to offer the best possible higher education for students in England.



# Appendices

# Appendix A: Background and methodology

The OfS has introduced a number of changes over the last 18 months, in terms of its communication and engagement activities. These include:

- The introduction of a programme of one-to-one visits to providers.
- The launch of a series of 'Introduction to the OfS' events for various groups, including:
  - In-person events for new accountable officers.
  - A webinar introducing the OfS for all higher education staff.
  - A webinar for chairs of governing bodies to introduce the OfS.
- The introduction of regular quarterly update webinars delivered by the chief executive, specifically for accountable officers.
- The introduction of calls from the OfS regulatory team for new accountable officers, including those both new to providers and those new to the role.
- Improvements to consultation approaches, with the intention of being more user-friendly (for example, including executive summaries and, where possible, lengthening consultation periods and staggering consultations).
- Working to improve the tone of communications.
- Improvements to the website, including a review of the 'contact us' section.
- The introduction of the digitised regulatory framework, available on the OfS website.

**The key research objectives were:**

To understand provider perceptions of the clarity of OfS regulatory expectations

To uncover which areas of OfS communication and external engagement are working well and where this engagement can be improved

## Methodology

### Recruitment

- Shift Insight created a screener form which was disseminated by the OfS through its contact lists.
- Provider size, financial typology, region and provision-related details were captured, with the aim of speaking to individuals from a range of providers.

### Interviews

- Shift conducted 44 interviews with accountable officers or designated senior decision-makers at providers in England.
- This consisted of 45-minute qualitative depth interviews using a semi-structured interview guide.
- Interviews included a number of key tracking questions, to be asked consistently, so answers could be directly compared.

### Analysis

- Interviews were then transcribed and thematically coded using Atlas.ti software, to identify key themes and aid analysis.
- A reporting meeting was also conducted with the interviewing team, to discuss findings and identify key insights.

## Project limitations

While our interviews and analysis method facilitated a rigorous and transparent approach to assessing provider perceptions of OfS engagement approaches, there are certain limitations to the findings that should be considered when reading this report.

Recruitment of participants was impacted by the timing of the general election, which limited external communications from the OfS. As such, strict quotas on criteria around size, financial typology, proportion of part-time learners, proportion of international learners and proportion of postgraduate learners were relaxed, though a varied sample was still achieved.

Participants were also self-selected; it was at their discretion whether to sign up to complete an interview. As such, this sample may represent those with the strongest desire to speak about this subject, which may have made more moderate voices less prevalent. One participant did not take part due to ongoing regulatory activity.

Additionally, while participants were given the option to be completely anonymous within the research, some expressed concerns about potential repercussions for expressing negative opinions on their regulator. This may have led some participants to self-censor their views or opt not to take part, to mitigate perceived risks to themselves or their provider.

Participants were given four options around their level of confidentiality within the research: to be completely anonymous, to be named in the report but not associated with any particular comment, to have their comments directly attributed to them, or to have their verbatim quotes attributed to them in the public report. However, to avoid compromising the anonymity of those who did not wish to be identified, names of participants and providers are not included in the report.

As this research also focused on participants' past perceptions of OfS communication and engagement activities up to two years ago, there is potential for inaccurate recall. Some participants were also not in their current provider or post at this time, preventing direct comparison.

Interviews also included a number of key tracking questions: these were closed questions using a scale that participants were asked consistently. While we have reported this quantitatively, the sample size does not allow us to present these results as a statistically robust representation of how widely held these views are among providers more broadly. Some participants also struggled to provide a specific answer to these questions, so some responses were excluded to enable clear frequencies to be given.

## Appendix B: Profile of respondents

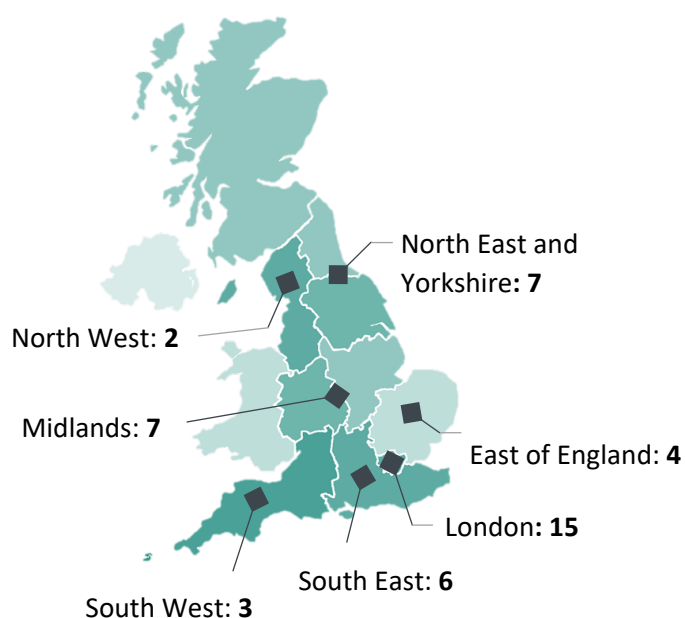
Data on the size, financial typology, proportion of part-time learners, proportion of international learners and the region in which the provider is located was collected. The accuracy of the sample's representation to registered higher education providers was constrained by levels of provider interest and availability.

44 interviews were conducted. 23 of these interviews were conducted with the provider's accountable officer. 21 were with other members of the senior management team; in four of these, two members of the senior management team were present.

### Region of provider

Participants from providers across all geographical regions were interviewed, as seen in Figure 4 below.

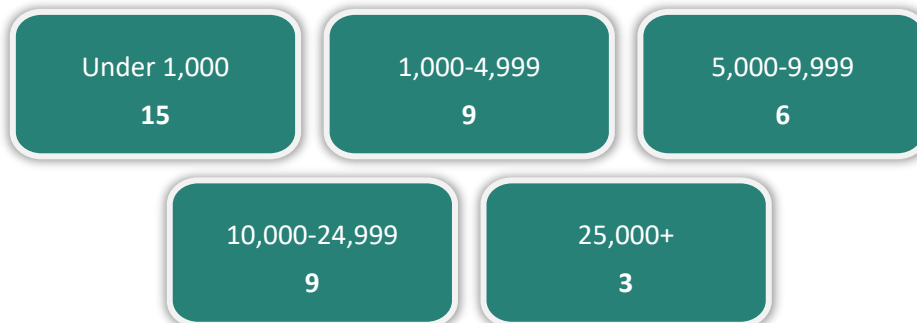
**Figure 4: The region of represented providers**



## Size of provider<sup>1</sup>

Providers of all sizes were interviewed. Figure 5 shows the total number of students currently enrolled at the provider, as an indication of size.

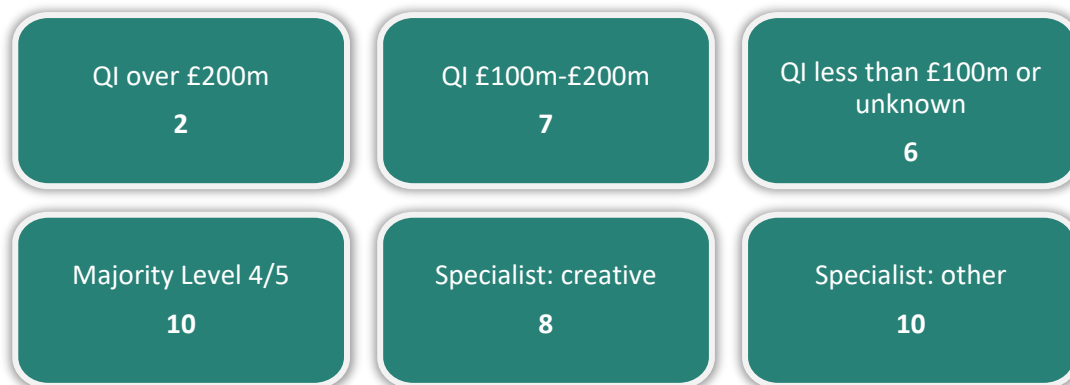
Figure 5: The number of students at represented providers



## Financial typology of provider<sup>2</sup>

Providers of all financial typologies were interviewed. This is an OfS categorisation based on ‘financial attributes’ and ‘the make-up of the student population or study characteristics’, used as an indication of provider size and type. QI refers to a provider’s ‘qualifying income’. This is shown in Figure 6.

Figure 6: The financial typology of represented providers



<sup>1</sup> Please note, this is the number of students at 42 of the 44 providers represented.

<sup>2</sup> Please note, this includes the financial typology of 43 of the 44 providers represented.

Provider typologies: <https://www.officeforstudents.org.uk/publications/provider-typologies-2022/>.

## Appendix C: Sources of regulatory information

Participants were asked how they typically hear about regulatory changes, to understand the extent to which the following sources were used:

**Direct mail from the OfS** was mentioned by almost all participants as a source of information about regulatory changes. This included the regular accountable officer email, sent to the accountable officer of each institution, as well as regular email updates and newsletters direct from the OfS.

**Sector media, and mission groups and sector bodies** were the joint second most common sources of regulatory information. This included sector press as well as communications sent by sector and mission groups such as Universities UK, GuildHE and the Association of Colleges.

Notably fewer participants listed **OfS web alerts** as a source of regulatory information compared to direct mail, which includes direct updates on press releases, blog posts and other announcements posted to the OfS website, which individuals working at providers can sign up to via the OfS website.

**National media** was identified by slightly over a half of respondents, though many caveated that they would not consider this to be necessarily consistent or reliable information.

**Social media** was one of the least used channels – only half of participants reported using it for this purpose. Twitter and LinkedIn were the key social media platforms used by participants. Several said they follow the OfS on LinkedIn, but not other platforms.

**The quarterly webinar updates from the chief executive** were the least used of the sources listed, despite being a channel that all participants were aware of. Due to these webinars taking place quarterly and as they are more focused on expanding on recent activity, other channels were seen to offer more immediate, up-to-date regulatory information.

Other sources of information mentioned by participants included more informal channels, like conversations with colleagues or sector peer networks.

# Appendix D: Responses to technical communication

A more detailed description of how providers felt about the OfS's technical communications, including technical guidance documents, the digitised regulatory framework and grant funding allocation notifications, is available below. This was excluded from the full report, as this seemed to have less of an impact on participants thoughts on the OfS's engagement approaches, as they did not regard these communications as a form of engagement, but rather as purely functional, informative channels.

## Technical guidance documents and the digitised regulatory framework

**Levels of awareness:** The majority of participants were aware of technical guidance documents and referred to them regularly. Those that had engaged with them largely found them helpful reference points for understanding and adhering to regulations. There were lower levels of awareness of the digitised regulatory framework, which was **newly introduced onto the OfS website within the last 18 months.**

### Strengths identified by participants

- a. Participants felt they made information easily accessible through the website.
- b. Several participants found them to be robust, detailed and comprehensive.
- c. The digitised regulatory framework was seen as a valuable reference point that participants could direct colleagues to for detail and clarification.
- d. Some felt they were clear and easy to navigate, especially for more experienced individuals in the sector.

### Recent improvements identified by participants

- a. The introduction of the digitised regulatory framework was generally regarded as a positive step in making information more accessible. A small number of participants also praised the introduction of 'insight briefs' summarising the larger, more detailed guidance documents, which they felt was useful.

### Areas for improvement identified by participants

- a. Participants suggested that technical guidance documents could be made more accessible and easier to understand, particularly for those with less experience in the sector or from smaller or specialist providers.
- b. Several participants suggested using a more 'plain English' approach across technical guidance, to reduce complexity and ambiguity.
- c. A few felt there could be more support in interpreting technical guidance to ensure a balanced approach between the extent of regulation and the support available to clarify technical guidance, to ensure providers' understanding and ability to comply.

## Grant funding allocation notifications

**Level of awareness:** Almost all participants were aware of and engaged with grant funding allocation notifications. Experiences among participants were mixed – some found them clear and found clarification forthcoming, while others experienced ambiguity and delays. No participants observed any notable changes over the last 18 months.

### Strengths identified by participants

- a. A few participants said they are straightforward and clear in laying out what was expected of them.
- b. A few had received quick responses when asking for clarification.
- c. One participant described the OfS staff who they interacted with in relation to grant funding as very good.

Grant funding allocations are pretty straightforward and they're neutral in tone. They're just information, so they do the job.

Accountable officer

## Areas for improvement identified by participants

- a. A few participants suggested that offering more precise timelines for when funding information will be received would aid in future planning and reporting.
- b. Participants from small providers also hoped for more realistic timelines for spending and reporting the impact of grant spending.
- c. A few participants suggested including explanations for allocations marked as 'TBC' or left blank in initial communications, or tailored emails sent to those with this allocation, to avoid uncertainty and anxiety.
- d. A few recommended clearer guidelines around how soon they are likely to receive a response to clarification requests, to help manage their expectations, as one participant commented on a perceived double standard around rigidity of deadlines imposed on providers as opposed to the OfS.
- e. One participant recommended making notifications less technical and complex to enhance understanding.