

OfS strategy 2025 to 2030

Consultation responses

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The consultation process

We published the draft Office for Students (OfS) strategy for consultation on 12 December 2024. The consultation was open for 10 weeks, closing on 20 February 2025. We received 97 unique responses, of which:

- 55 were collective responses from higher education institutions
- 17 were from higher education sector bodies
- nine were from students or student unions
- eight were from professional, statutory or regulatory bodies
- five were individual responses from higher education institutions
- three were responses that did not fall into any of these categories.

To strengthen our understanding of stakeholders' views, we ran a series of feedback events during the consultation period, including two dedicated events for students. This engagement is not captured in the numbers above but has been considered as part of our response to the consultation. 150 people attended these events in total, including 31 students. Before publishing our proposals, we conducted a programme of research comprising surveys and focus groups, reaching 2,538 students in total.

We consulted on our draft strategy because we want to take account of stakeholders' views in its development and to ensure a fair and transparent process. Following consultation, we commissioned Pye Tait to undertake an independent analysis of consultation responses, drawing out common themes and indicating broad levels of support for different elements of the draft proposal.¹

The consultation asked broad questions, meaning there is significant variation in the way consultees chose to respond. This document identifies key themes in consultation responses and explains how these have been considered in the development of our final strategy and associated 'strategy roadmap'.² It is not intended to provide a line-by-line response to all consultation submissions. Where appropriate, we explain alternative approaches that have been considered and discounted. Where we do not implement changes advocated for by consultees, we explain why.

Many respondents provided comments on issues of policy detail that were not in the proposed strategy and that we were not consulting on. We have not included all such comments in our summary below. However, in making our final decision on the content of the strategy, we have had regard to all of the feedback that we received.

In developing our final strategy, we have had regard to our general duties as set out in section 2 of the Higher Education and Research Act 2017 (HERA). The OfS strategy 2025 to 2030 is relevant

¹ Pye Tait's full report is available at [OfS strategy 2025 to 2030 - Consultation responses](#).

² See [The OfS strategy roadmap](#).

to all OfS activity over the next five years, and we therefore consider all general duties to be relevant.

We also had regard to:

- the Regulators' Code
- guidance issued by the Secretary of State
- the public sector equality duty.

Consultation responses

Question 1: Do you have any comments to make on the OfS's proposed strategy for 2025 to 2030 or the priorities set out within it?

Strategic priorities

Consultation responses suggested broad support for the strategy's focus on quality, the wider student interest and sector resilience, with equality of opportunity integrated throughout. A number of respondents commended the student-centric approach of the strategy.

A minority of respondents questioned the proposed integration of equality of opportunity, suggesting that this could lead to a dilution of regulatory focus and signal deprioritisation to institutions.

Some students expressed concern that the framing of the 'wider student interest' section within the strategy may suggest to institutions that these issues are secondary and less important.

OfS response

We are encouraged by broad support for the strategic priorities we proposed. These are retained in our final strategy and reflected in our strategic goals. We have changed the wording of our second priority area from 'wider student experience' to 'student experience and support', to better reflect the fact that the issues contained within this area are central to securing positive and experiences and outcomes for students. The related goals have not changed.

We continue to believe that integrating equality of opportunity will maximise our ability to extend the benefits of high quality higher education to students from a diverse range of backgrounds. It will ensure that a commitment to equality of opportunity drives our approach to the many and varied issues that affect the experiences and outcomes of students from disadvantaged backgrounds and underrepresented groups. It recognises that where institutions are not meeting our requirements students from these groups are disproportionately affected. A standalone goal committing to the promotion of equality of opportunity would artificially suggest that equality can be advanced in isolation of other concerns.

However, we understand that integration will only support our objectives if it is undertaken consciously and determinedly. To reflect our commitment to doing this, equality of opportunity features prominently under the 'ambitious' attitude at the core of our revised strategy. We will continue to measure and publish data on the access and participation among students from disadvantaged backgrounds.

Quality

Respondents generally supported strategy proposals to develop an integrated approach to quality in principle but requested more information about what reforms would mean in practice. In particular, respondents wanted to understand the relationship between a reformed quality model and the Teaching Excellence Framework (TEF), raising questions about possible duplication and additional burden.

Respondents welcomed proposals to increase our focus on quality enhancement but told us that implementing this change effectively would require a stronger working relationship between the OfS and institutions.

Some respondents queried the value of a Quality Risk Register and raised concern on the assumption that it would function as a mechanism for imposing additional regulatory requirements. Others supported the proposal on the condition the register be designed and developed in collaboration with the sector.

OfS response

We are encouraged by support for an integrated approach to quality regulation in principle and recognise the importance of getting the detailed design of the reformed quality model right. The reformed model is being developed collaboratively with students and institutions via a process of consultation that sits outside of strategy development. We published our consultation proposals on 18 September 2025.³

In response to questions about the relationship between the future quality model and the TEF, we have clarified in the strategy roadmap that the future quality model will be an evolution of the TEF, and not an addition to the TEF.

We recognise that effectively driving quality enhancement will be contingent on a productive working relationship with the institutions we regulate and the sector more broadly. Our final strategy identifies 'collaborative' as one of four attitudes critical to achieving our strategic objectives. By embodying this attitude and working to build relationships based on mutual respect, confidence and trust, we believe we will be well placed to provide the challenge and support needed to drive improvement beyond our minimum requirements.

We have removed proposals to publish a Quality Risk Register from the strategy and will give further thought to how we can best engage with the sector on the major risks we see in the system.

Wider student experience

Respondents agreed that non-academic issues significantly affect students' experiences of, and ability to benefit from, higher education. However, some suggested that the draft strategy did not sufficiently account for student diversity and argued for greater emphasis on the needs of different student groups. Others understood the strategy to imply an expectation that institutions deliver a standardised extra-curricular offer and questioned the viability and desirability of this.

Some respondents had reservations about an enhanced, OfS role in protecting students' consumer rights. They raised the risk of scope creep and possible overlap with the work of organisations such as the Competition and Markets Authority (CMA). In relation to mental health, some respondents took the strategy to imply a greater role for universities and colleges in the delivery of healthcare than they considered appropriate or reasonable. They suggested that the OfS should support student wellbeing by convening relevant stakeholders and supporting a joined-up approach across the higher education and health sectors.

³ Available at [Consultation on OfS strategy for 2025 to 2030](#).

OfS response

We recognise the diversity of students' interests. Our final strategy foregrounds 'the interests of students' as opposed to 'the student interest', reflecting the range of interests we must take account of in delivering our strategic objectives. The research and engagement that underpinned the development of the draft strategy identified the essential building blocks of positive higher education experiences, common across student groups. These are not intended to be exhaustive, but to clearly articulate the core things students expect so that we can place them at the centre of our work. We continue to consider this valuable, so have retained a synthesised form of words describing students' expectations in our final strategy.

We do not expect institutions to deliver a standardised extra-curricular offer. To reflect this, our strategy roadmap explicitly recognises that students studying at different types of institutions are likely to have different expectations and priorities regarding the extra-curricular opportunities they are afforded, and the support they receive.

In response to concerns about scope creep, we have removed potentially ambiguous language that may have suggested the possible extension of formal, regulatory levers into areas such as accommodation and student wellbeing. Instead, the strategy roadmap sets out plans to deploy non-regulatory approaches where issues that matters to student supplement our regulatory scope. We will highlight areas of concern or interest that may not be subject to direct regulation, while also working with sector partners to improve students' experiences.

We remain committed to a more active role in protecting students' consumer rights. While most students' experiences of higher education are positive, our research and engagement suggests that students do not consistently feel that the promises made to them by their institutions have been fulfilled. Furthermore, many students lack confidence in, or an understanding of, internal redress mechanisms. We remain concerned that students' rights as consumers are not always upheld. Noting the consultation responses that identify a risk of overlap, we will work closely with the CMA and others as we develop our approach to support a cohesive regulatory environment.

Sector resilience

Respondents widely welcomed the strategy's proposed focus on sector resilience, with many agreeing that financial sustainability is foundational to achieving the strategy's objectives relating to quality, choice and equality of opportunity. Many respondents agreed that good institutional governance would be critical to managing financial risks, but some warned against an overly prescriptive approach. Others pointed to the importance of sector bodies, such as the Committee of University Chairs (CUC), in overseeing institutional governance.

While respondents supported proposals to closely monitor financial risk, many emphasised the need to do so in a way that minimises burden, with improvements to data collection processes identified as a priority. Many respondents suggested that the strategy would impose additional regulatory burdens against a backdrop of constrained institutional finances, which may negatively affect students.

OfS response

We understand the pressures institutions face and agree that balancing the benefits of regulation against the burden it imposes is particularly important within this context. Through the

'collaborative' attitude, our final strategy foregrounds the importance of working collaboratively with institutions and other partners to support a cohesive regulatory environment. This recognises that many of the institutions we regulate are subject to multiple regulatory regimes. By working together, we will reduce overlap and minimise burden when possible. Our roadmap retains commitments made in the draft strategy to minimise burden through improved data collection processes.

We remain committed to increasing our focus on good governance. The approach to institutional governance described in the draft strategy, the final strategy and the strategy roadmap, is risk-based, with monitoring and compliance activity concentrated where risks to students and taxpayers are most acute. Our wider work on institutional governance will be undertaken collaboratively with the sector. Our strategy roadmap now commits to working with sector agencies, as well as with institutions, to identify and address barriers to strengthened governance, recognising the importance of organisations such as the CUC.

Approach to collaboration

Respondents were supportive of the draft strategy's commitment to collaboration. Many welcomed the collaborative tone of the strategy itself, noting that a productive working relationship will be critical to achieving the strategy's aims. Several respondents acknowledged that the OfS has made efforts to improve its relationship with institutions but stressed that there is more to do.

OfS response

We are encouraged by support for the draft strategy's commitment to collaboration and respondents' recognition of ongoing work to build effective working relationships with the institutions we regulate. We agree that there is more to do. To underline our commitment to further progress, and signal the foundational role that collaboration will play in achieving our aims, our revised strategy identifies 'collaborative' as one of the four attitudes that will drive the delivery of our strategic objectives. Embodying our 'vocal' attitude, by championing the benefits of higher education, will also help to create an environment conducive to effective collaboration, recognising a shared endeavour in the interests of students and the country.

Implementing the strategy

Many respondents commented on the operational requirements of delivering the strategy. Some raised concern about any increase in regulatory activity leading to higher registration fees for institutions. Others questioned the capacity and capability of the OfS to deliver the strategy. Many respondents requested more information, to help them understand what the implementation of the strategy would mean in practice.

OfS response

The draft strategy included a commitment to improving the efficiency and effectiveness of our systems and processes. The final strategy strengthens and foregrounds our commitment to efficiency, through our 'vigilant' attitude, which explicitly articulates the importance of providing value for the taxpayers and institutions that fund our work. Strategy attitudes collectively emphasise the importance of how we regulate, responding to consultation feedback that encouraged more consideration of what delivering our goals will require from the OfS as an organisation.

Recognising the importance of accountability and transparency to building trust in our delivery capability, the strategy roadmap commits to the routine publication of key performance measures that track the extent to which we are embodying strategy attitudes. We will continue to publish operational measures alongside key performance measures. Further information about what we plan to do each year will be included in annual delivery plans.

Question 2: Do you have any comments about any unintended consequences of the proposed strategy or the priorities set out within it, for example for particular types of providers, particular groups of students, or for individuals on the basis of their protected characteristics?

Regulatory burden

Many respondents said that an increase in regulatory requirements would present potential risks to students' experiences of higher education, with resources diverted from provision to compliance-focused activity.

OfS response

As described above, we are committed to balancing the benefits of regulation against the burden it imposes. By working collaboratively to support a cohesive regulatory environment, and implementing improvements to our data collection processes, we will minimise regulatory burden where possible, while maintaining the oversight we need to provide the assurance students and taxpayers require. We are working with Jisc and the sector to identify and implement improvements to our approach to data collection.

Sector diversity

Some respondents said that the draft strategy focused on 'traditional' pathways through higher education at the expense of alternative pathways that students from disadvantaged and underrepresented backgrounds are disproportionately likely to pursue. They suggested that this lack of focus could inadvertently 'sideline' non-traditional routes and lead to a contraction in support for students pursuing such opportunities. Within this context, some respondents argued for greater focus on the needs of remote learners, part-time students, working students and those with caring responsibilities.

OfS response

We agree that the diversity of the higher education sector is a strength. A diverse sector is needed to meet both the diverse needs of students and the changing skills needs of the economy.

Our revised strategy, reformulated around four attitudes, underlines our commitment to being 'ambitious' for all students, regardless of their background, circumstances or pathway.⁴ This emphasises our continued commitment to supporting all students to succeed. The roadmap sets out in more detail the steps we will take to tackle barriers to equality of opportunity, so that more students share in the benefits of high quality higher education. The roadmap also commits to

⁴ For details of the attitudes, see [The OfS strategy 2025 to 2030](#).

celebrating and sharing examples of excellence ‘wherever we see them’, recognising that excellence takes many forms and is delivered by providers all of types.

Perceived tension between the strategy quality and financial sustainability objectives

Some respondents said that the strategy could better reflect the balance between quality and financial sustainability, pointing out that institutions are delivering high quality teaching with increasingly constrained finances.

OfS response

We are acutely aware of the financial pressures universities and colleges are navigating and recognise the downward pressure that this may apply to quality. In this context it is especially important to have a regulator working to maintain and improve quality. As set out under the ‘ambitious’ attitude in our final strategy, we believe that while much provision is already excellent, there is room for further improvement. We will work collaboratively with institutions and sector groups to support continuous improvement, including by identifying and celebrating examples of excellence, while continuing to protect students from low quality provision.

Question 3: Are there aspects of the proposals you found unclear? If so, please specify which, and tell us why.

Requests for further detail

Many respondents sought more detail on individual strategy proposals. Most of these requests relate to the proposed changes to quality regulation, the proposal to introduce a quality risk register, and data collection activities. In some cases, respondents said they would be unable to take an informed view on the merits of proposals until they understood the policy detail and could consider implementation plans.

- In relation to proposed changes to **quality regulation**, respondents wanted more information about what ‘integration’ would mean in practice, and the relationship between the new quality regime and the TEF.
- In relation to the **quality risk register**, respondents wanted to understand how it would be constructed, populated, and used. They also wanted to better understand how it would add value to the quality mechanisms already in place.
- In relation to **data collection activities**, respondents wanted more information about the anticipated role of predictive and lead indicators in OfS regulation and the implications of plans to use more real-time data from the perspective of institutions.

OfS response

Strategy documents necessarily capture a wide range of activity and it is neither feasible nor desirable to provide detailed information on individual proposals.

As set out above, proposed changes to the regulation of quality are being developed collaboratively with students and institutions through a separate process of consultation and engagement. In response to feedback, the language in the strategy roadmap now makes clear that proposed reforms to quality will not create an additional quality assessment regime that operates in parallel to TEF. Rather, we propose to build on the TEF, modifying and expanding the existing mechanism to improve its reach and impact.

In response to consultation feedback, we have removed proposals to publish a quality risk register and will give further thought to how we can best engage with the sector on the major risks we see in the system.

Improving our use of data and intelligence will be a priority across the strategy period as we seek to build on progress made to date. We are working with Jisc and the sector to identify and implement improvements to our approach to data collection. We do not consider a strategy document to be the appropriate vehicle for a detailed account of the use of data and indicators; we will continue to communicate via other means as our thinking develops.

Question 4: Our previous strategies have covered periods of three years. For this strategy, we are proposing an extended strategy period of five years. Do you have comments on this proposal?

Strategy period

A large majority of respondents agreed with the proposal to extend the strategy period to five years. Many said this would provide the sector with stability, which is particularly welcome in a period of change and uncertainty, enabling more effective long-term planning. Several respondents, however, emphasised the need for the strategy to remain flexible and responsive to emerging issues, with some suggesting regular review points.

OfS response

We are encouraged by widespread support for an extended strategy period and our final strategy covers the period to 2030 as originally proposed.

We recognise the need to remain agile should the world around us change. Our strategy attitudes are designed to support predictability in an uncertain environment by helping stakeholders to understand the way we will regulate, rather than what we will regulate. While planned activities might need to change, our approach will remain consistent, irrespective of changes in the wider environment. Our strategy roadmap makes clear that the plan set out reflects our current assessment of the risks and opportunities likely to shape the higher education sector over the coming years and outlines how we plan to protect students' interests within that context. We remain alert to the need for agility and flexibility should this assessment change.

Question 5a: Do you think that our proposed 'I statements' appropriately and clearly describe the impact that delivery of our strategic objectives should have on our key stakeholders?

Question 5b: Do you think that the strategic objectives distilled in our proposed ‘I statements’ are the right ones? Do you propose any additional ‘I statements’?

‘I statements’

Many respondents were supportive of ‘I statements’, describing them as user-friendly and accessible, particularly for students. Some, however, considered them to be of little use. Criticism of ‘I statements’ centred on the assumption that they would be used to measure the performance of institutions, with respondents highlighting the increased regulatory burden this may impose. Some respondents said that subjective statements constitute an unreliable basis for assessing institutions’ performance.

Commenting on the specific ‘I statements’ we proposed, some respondents suggested they should better reflect the diversity of students and the sector, recognising the additional challenges that many students face. Others said ‘I statements’ should acknowledge that it is the responsibility of students to take advantage of the opportunities they are given, and that positive experiences and outcomes cannot be guaranteed by institutions.

Respondents also proposed additional ‘I statements’ recognising the broader societal impact of higher education and reflecting the regulatory performance and behaviours of the OfS more directly.

OfS response

We agree that ‘I statements’ from the perspective of students add most value. To reflect this, we have published 11 ‘I statements’, all from the perspective of students. The strategy’s focus on how we will regulate means that many of the objectives and behaviours conveyed via other ‘I statements’ are now reflected in our strategy attitudes. For example, strategy attitudes set out our commitment to working collaboratively, to delivering efficient and effective regulation, and to regulating in a way that enables universities and colleges to drive growth.

‘I statements’ are a communications tool and not a regulatory device. This is clearly explained on our website, recognising and responding to the confusion surfaced during consultation about their intended purpose and use.⁵

We tested the language in our revised ‘I statements’ to ensure they do not imply an expectation that institutions guarantee positive experiences and outcomes for all students, irrespective of how students engage. We are confident the revised set of statements communicates our expectation that institutions create opportunities for students to succeed, without suggesting a lack of responsibility on the part of students to take these up. The ‘vigilant’ attitude in our revised strategy sets out our view that students are entitled to expect positive experiences and outcomes in return for their investment of time, money and hard work.

In response to consultation feedback, we have added an ‘I statement’ explicitly articulating our commitment to equality of opportunity:

⁵ We have published details of the [‘I statements’](#) on our website.

- 'I am confident that I will have the same opportunities to thrive in higher education as my peers, regardless of my background or personal circumstance.'



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