

**Office for Students consultation on the future
approach to quality regulation**

**Response from the Chartered Association of
Business Schools**

11th December 2025

Proposal 1: A more integrated overall system

Question 1a: What are your views on the proposed approach to making the system more integrated?

CABS response: There are major issues to address as to how an integrated system combining the OfS B conditions with the TEF to produce a single TEF rating will work in practice. The B conditions were established to regulate courses, and the associated metrics were not designed to be aggregated to award a provider-level rating.

In particular, there are big challenges with the complexities surrounding the benchmarks and thresholds, and how these will be communicated to parents and prospective students when selecting courses. The proposed TEF methodology is not easy to understand and will be confusing to end users.

Furthermore, some of the B conditions are based on metrics which may not be fully reflective of a provider's performance and the context they are operating in. This means that institutions focused on widening participation may find it more challenging to achieve higher TEF awards than others, contradicting the broader aim of increasing access to HE and penalising such institutions.

Regulatory developments should be fit-for-purpose, proportional, and should not increase the costs of compliance for an already financially-challenged sector. It is how these changes are designed and implemented that will determine the effectiveness of the new regulatory framework.

Question 1b: Do you have views on opportunities to reduce duplication of effort between the future TEF and Access and Participation Plans?

CABS response: Our members feel that opportunities could exist to reduce duplication of effort between the future TEF and APPs but this will depend on the approach adopted to integrate these two systems. We see potential in enabling institutions to focus their efforts on delivering impact rather than reporting the same data in different formats. Any reduction in duplication in the future TEF will require a clear distinction in the purpose of the APPs. This could be that the TEF assesses equality of opportunity in outcomes while the APPs focus on access, outreach and progression pathways. We recommend that the OfS proceeds with caution in making any changes to the APPs in the context of TEF and that these should be implemented gradually over a significant period of time based on clear objectives that are monitored for progress.

Proposal 2: Providers in scope

Question 2a: What are your views on the proposal to assess all registered providers?

CABS response: The proposal to assess all registered providers has merit in providing transparency and assurance to students as to the quality standards they can expect to receive. However, the administrative burden could be particularly significant for smaller providers, including more employer-focused providers who will be important in helping the UK deliver the post-16 skills agenda.

Our members have noted that central university teams will be required to provide information to the OfS in support of the cyclical assessments but that such teams are currently being reduced at many institutions due to stretched budgets. They are also concerned that assessing on a cyclical basis will place significant demand on the resources of the OfS given the volume of assessments required.

In addition, it is important to acknowledge that HE and FE provision in England is fundamentally diverse. Universally applying a framework such as TEF could result in a system which imposes a uniform definition of quality on institutions that have profoundly different missions, pedagogic models and student populations. TEF presupposes that common indicators can meaningfully measure excellence across a diverse landscape of HE and FE providers when in reality what constitutes “good” or “outstanding” will be context-dependent. If TEF is to be extended to all providers, the framework should go further in recognising the diversity of the sector by allowing definitions of excellence which reflect the varied missions and contributions of different types of institutions.

We are concerned that cyclical assessments will add significant pressure on our member business schools in particular as they are already subject to accreditation measures with the AACSB, AMBA and EFMD. Business schools seek these accreditations in order to attract vital international student revenue for their parent universities. For those business schools who maintain a range of external quality assurance standards, significant efforts are already put in place to respond to such assessment exercises, which should mean that they do not require such frequent assessments by the OfS.

Question 2b: *Do you have any suggestions on how we could help enable smaller providers, including those that haven’t taken part in the TEF before, to participate effectively?*

CABS response: Smaller universities would benefit from guidance and support from the OfS to build systems that collect data aimed at helping improve student outcomes and experience. Phasing in the proposed reforms over time will be essential in enabling a smooth transition for smaller providers and those who haven’t participated in the TEF before.

If the OfS is to proceed with the planned arrangements, it is critical that they are adequately resourced, such as through a special support team to guide institutions through the process.

Proposal 3: Provision in scope

Question 3a: *Do you have any comments on what provision should be in scope for the first cycle? You could include comments on areas such as:*

- *the inclusion of apprenticeships*
- *the proposal to look separately at partnership provision*

CABS response: In principle we agree that all undergraduate provision should be within scope of the first assessment cycle but the potential inclusion of apprenticeships requires careful consideration. We do not oppose the inclusion of Degree Apprenticeships in TEF, but urge the OfS to avoid regulatory duplication and misalignment with existing government frameworks.

Apprenticeship providers already manage Ofsted inspection, Apprenticeship Accountability Framework (AAF) indicators, funding-audit evidence chains, OfS outcomes thresholds, and for integrated programmes, OfS EQA of EPA. Adding distinct TEF metrics for apprenticeships risks duplication, mixed signals, and a materially higher regulatory burden.

A provider can receive an Ofsted report card recognising strong training and inclusion now, while OfS TEF/B3 may still reflect historic continuation/progression data—and AAF may simultaneously uplift or tighten thresholds on achievement rates. This fragmented approach can result in

contradictory signals and unfair consequences for providers, regardless of the actual quality of their apprenticeship delivery.

Inclusion of Degree Apprenticeships in TEF could potentially add value by recognising Ofsted's judgements on the apprenticeship student experience/training dimension, rather than re-inspecting it; re-using AAF measures (or referencing them transparently) for apprenticeship outcomes rather than inventing parallel indicators; and allowing contextualisation of post-study measures to reflect that many apprentices are already employed and progress internally in ways not captured by graduate surveys.

Degree apprenticeship learners are often mature professionals, advancing their careers and contributing more effectively in their roles. Standard graduate surveys do not capture these nuanced outcomes, and TEF should develop more sophisticated approaches to measure the real impact of apprenticeship programmes.

We recommend that OfS carefully considers the unintended consequences of applying TEF incentives and interventions—such as recruitment caps or fee restrictions—to Degree Apprenticeships. The use of institution-wide metrics without appropriate contextualisation risks undermining good apprenticeship provision and could discourage providers from investing in or expanding these programmes.

Given the increase in the scale of franchised provision and the concerns about quality standards, we agree with the proposal that undergraduate provision taught by other providers in England through partnership arrangements should be within scope of the TEF assessments. This will enable transparency and accountability for courses taught under these arrangements and give prospective students the information they need to evaluate the quality and credibility of a course delivered under a partnership arrangement.

However, a single approach is unlikely to capture the complexity of these arrangements which can vary significantly by model (e.g. franchised versus validation). High-quality partnership provision at a provider does not always produce identical outcomes to main campus delivery, and it should therefore be interpreted within TEF using a clear contextual framework that reflects student mix, regional labour markets, and provider missions.

There is clearly a lot more work needed to develop the right framework to incorporate partnership provision within the TEF to ensure that students can link the rating of the teaching provider under consideration to the lead provider. This means that the framework should rate each franchised provider accordingly. Furthermore, there is a risk that students could end up with two different sets of information on the same course if the course is offered by both the lead provider and franchised provider. The format for presenting this information therefore needs to be clear.

Given the risk that students may be confused by two different sets of information provided on the lead and franchised provider it is important that the format developed is tested thoroughly with students before being rolled-out. More detail is also needed on the proposal for material differences in a provider's quality between taught and partnership provision to have an impact on their overall TEF rating. Given the importance of a TEF rating for a provider, the mechanism by which these material differences will be determined and communicated needs to be developed further.

Question 3b: Do you have any comments on the proposed approach to expanding assessments to include taught postgraduate provision in future cycles?

CABS response: PGT courses form a substantial part of business school provision and we are therefore concerned that the proposal to delay the inclusion of PGT provision within the TEF would place a major part of business schools' activity, and international students in particular, outside the scope of the TEF for several years. Business schools rely heavily on PGT provision and excluding it from TEF for several years weakens international competitiveness and leaves too much of our provision outside a national quality marker.

We note the proposal to develop a PGT survey to assess the experiences of PGT students but there is no mention in the consultation document of Advance HE's Postgraduate Taught Experience Survey (PTES), and we recommend that the OfS learns from the PTES before embarking on the development of an alternative survey.

For consistency and clarity amongst students, it would make sense for the measures used in any PGT survey to align with those used in the NSS. It is important that prospective postgraduate students have information available to judge the quality of the courses they are considering just as undergraduates can do using the NSS. However, our members have concerns about the likely engagement of PGT students with such a survey, as such cohorts typically spend less time at their institutions and often study under part-time or flexible arrangements. Furthermore, many PGT students are international which is an additional barrier to engaging with surveys.

Proposal 4: Assessment aspects and ratings

Question 4a: What are your views on the proposal to assess and rate student experience and student outcomes?

CABS response: We agree with the principle of rating providers for both student experience and outcomes because we believe that providers should be striving for excellence in these areas. Assessing both aspects creates a more complete picture and allows for a cycle of continuous improvement, where recent actions to improve the student experience should lead to better outcomes in future TEF rounds. Importantly, embedding equality of opportunity within each aspect is important so that ratings reflect not only average performance but consistency across all student groups. The clearer alignment with the B conditions also enhances transparency, helping students and the sector understand what is being measured and why.

However, it should always be borne in mind that factors relating to student outcomes can be well beyond an institution's control, such as current economic conditions and labour market forces. We would expect that the new system will factor in the external context when evaluating student outcomes.

We also recognise that there can be significant variation in performance between the two aspects at a single provider and it's important that students are able to access distinct results, meaning that split data for outcomes and experience by subject area should be accessible. We also believe it makes sense for an overall provider rating to be derived from the assessments against these aspects, but we have concerns about the proposed approach to derive the overall rating. Using data as a proxy for quality can result in misleading conclusions so it is important not to lose sight on actual process improvement if the revised approach to TEF is to add genuine value for students.

Question 4b: Do you have any comments on our proposed approach to generating 'overall' provider ratings based on the two aspect ratings?

CABS response: Although there is merit in using a mechanistic, rules-based approach to determining the overall rating, it does seem inconsistent to measure two key aspects but to disregard performance in one aspect when determining the overall rating if performance in the other aspect is lower. The OfS should consider more nuanced approaches to determining the overall rating.

The OfS should re-consider the proposal to remove the TEF panel from the process of determining the overall rating as a panel-derived rating will allow for a more rounded view of a provider's performance, accounting for contextual factors not captured by the metrics used by the rules-based approach.

Proposal 5: The student experience aspect

***Question 5a:** What are your views on the proposed scope of the student experience aspect, and how it aligns with the relevant B conditions of registration?*

CABS response: Overall, the proposed scope for the student experience aspect broadly aligns with the intent of the B conditions of registration, particularly regarding quality of teaching, learning resources, and academic support. However, there are several areas where the proposed approach could be strengthened to better reflect the complexity of student experience and ensure fair assessment.

The current proposal appears to treat 'student experience' primarily through survey-derived metrics. While these are important, they should not become the sole or dominant lens. Student experience is multi-dimensional and includes elements—such as academic challenge, belonging, and support for diverse student groups—that are not adequately captured by headline survey questions. The proposed approach does not sufficiently address the variability in student groups, as providers serving large numbers of commuter, mature, international, or widening participation learners will naturally surface different patterns of engagement and satisfaction. A more nuanced interpretation of B conditions is needed to avoid penalising institutions for serving a wider range of student groups well.

If student experience is already judged through the B conditions, TEF should add value through evaluating enhancement, innovation, and evidence of intentional educational design—not simply re-labelling existing regulatory measures with a new rating. Finally, we caution against the proposal to rely significantly on NSS scores in determining student experience as some providers have courses with very low response rates to the NSS, due to small sample sizes.

***Question 5b:** What are your views on our initial thoughts on the criteria for the student experience rating (at Annex H)? You could include comments on:*

- *whether the 'course content and delivery' criteria suggested in Annex H should be framed differently for a provider-level assessment*
- *whether there is clear enough differentiation between each level, and how this could be improved*

CABS response: The initial criteria for the student experience rating set out in Annex H are a strong starting point, but there are areas where further refinement would improve clarity and usefulness for provider-level assessment. The 'course content and delivery' criteria may not easily translate to judgements at provider-level where it may be more appropriate to emphasise the systems, frameworks, and institutional practices that ensure high-quality content and delivery across diverse

subjects and modes. It may not be feasible or appropriate to develop an assessment which assumes a uniformity of practice at course-level.

The initial criteria could be made more holistic by examining how providers purposefully shape student experience rather than solely measuring students' reported perceptions. This could include aspects such as curriculum, scaffolding, assessment literacy, inclusive pedagogy, or academic challenge — all central to student experience and the B conditions.

The differentiation between Gold, Silver, Bronze and 'Requires Improvement' is conceptually clear, especially with the increased emphasis on consistency across groups of students and areas of provision. However, in practice some descriptors remain quite high-level and may be difficult to apply consistently. Strengthening the distinctions—particularly between Silver and Bronze—would help avoid ratings clustering around the middle and give providers a clearer understanding of what constitutes 'consistently and materially above minimum requirements'. More concrete examples or indicative evidence sources could also support TEF assessors in applying the criteria fairly and transparently.

Question 5c: *What are your views on the evidence that would inform judgements about this aspect? You could include comments on issues such as:*

- *what evidence could demonstrate the requirements of condition B1 are met at a provider level*
- *whether the submission page limit should be reduced*
- *the proposed inclusion of indicators based on the 'Learning opportunities' theme of the NSS*

CABS response: The evidence proposed to inform judgements on the student experience aspect is broadly appropriate, but several refinements are needed to ensure that judgements reflect genuine educational quality rather than narrow indicators. For condition B1, evidence of institutional processes—such as quality assurance frameworks, curriculum review cycles, external examiner oversight, and mechanisms for student–staff dialogue—may be more meaningful than isolated examples of local good practice.

At provider level, the focus should be on whether robust systems exist and operate consistently across all subject areas. These forms of evidence reflect the spirit of B1 — that quality sits in the provider's educational infrastructure and processes — rather than only in retrospective student feedback.

A modest reduction in the submission page limit could be helpful, but only if accompanied by transparent criteria, examples of what counts as sufficient evidence, and clarity on how contextual explanations can be meaningfully provided.

In regard to the proposed inclusion of indicators based on the NSS 'Learning opportunities' theme, we again caution against placing an overly high weighting on this data and suggest it forms only one part of the evidence used to assess a provider's performance against condition B1.

Proposal 6: A revised and integrated condition B3

Question 6: *Do you have any comments on our proposed approach to revising condition B3 and integrating the assessment of minimum required student outcomes into the future TEF? You could include comments on areas such as:*

- *removing the progression indicator from condition B3*

- *how contextual factors would be considered at different stages in the process.*

CABS response: We agree that student outcomes should continue to be an integral component of the future TEF as we believe that institutions should seek to deliver excellent outcomes for students. The proposed removal of the progression indicator for the assessment against condition B3 seems sensible given the limitations of the data obtained from the ‘*Graduate Outcomes*’ survey. However, as progression into further employment is a very important outcome for students, we feel this should continue to be tracked within TEF but using a more reliable methodology than currently provided by ‘*Graduate Outcomes*’. We agree with the rationale that continuation and completion measures are more closely within the control of providers than progression measures.

Overall, integrating B3 more explicitly into the TEF has merit, but clarity and proportionality will matter. The revised approach should ensure that data is interpreted with an understanding of subject and cohort mix and maintain a sharp distinction between the minimum thresholds and the higher standards recognised by TEF ratings. We have concerns about how the future TEF will treat lagging student outcomes data, particularly for institutions with a widening participation mission. There is a real risk that providers could receive a Bronze rating based on historic performance, without sufficient opportunity to demonstrate improvement.

The lack of transparency around the threshold calculation methodology further complicates institutional planning. Without clarity, it becomes difficult to introduce effective interventions—and risks incentivising “gaming” behaviours rather than genuine enhancement of the teaching process.

Proposal 7: The student outcomes aspect

Question 7a: *What are your views on the proposed approach and initial ratings criteria for the student outcomes aspect?*

CABS response: The use of benchmarked indicators where providers must meet minimum thresholds for continuation and completion whilst also exceed benchmarks are not intuitive to understand and will make it difficult for staff and especially students to engage with TEF. It would be helpful if actual examples including data were provided to explain the ratings criteria provided in Table 1.

The proposed approach to assessing student outcomes and the initial ratings criteria is overly reliant on narrow, short-term quantitative indicators. Outcomes can be heavily influenced by regional and national labour market variations, the demographic composition of student cohorts, and economic cycles. Furthermore, measuring progression 15 months after graduation is too limited to establish the true impact of HE. Some career pathways may only show meaningful career progression after several years. Careers can be non-linear, and some students, particularly those from Business and Management, may seek to become entrepreneurs which can take longer to bear fruit. Given the scale and importance of international student income to the HE sector, excluding international graduate destinations from performance metrics results in a highly partial picture.

Outcomes should be interpreted alongside contextual indicators that help explain why students progress or do not progress. Such contextual factors could include student engagement in curriculum design and authentic assessment, and targeted professional and career development support. Without taking into account factors that drive constructive improvement there is a risk that the system may incentivise gaming and undermine the TEF’s mission to deliver excellent student experience and outcomes.

The validity of the benchmarked split indicators for different students and course characteristics will of course depend on how these are calculated. Given that the narrative in proposal 6 notes limitations to the use of data from 'Graduate Outcomes' as a progression indicator, it therefore seems somewhat contradictory that it is proposed that two out of the three indicators for progression would still come from 'Graduate Outcomes'.

Question 7b: *Do you have any comments on the proposed set of employment and further study indicators, and are there other measures that we should consider using?*

CABS response: We support the use of the Longitudinal Education Outcomes (LEO) dataset to develop the benchmarked salary measure but would suggest that the indicator also looks at salaries after a longer time period (e.g. five years) as three years is again too short to determine the full extent of the outcomes.

Question 7c: *What are your views on the proposal to consider a limited set of contextual factors when reaching judgements about this aspect?*

CABS response: We support this approach and recognise the efficiencies in basing the assessment of contextual factors on metrics rather than provider submissions. However, there is value in providers being able to provide their own contextual evidence so we don't think the scope of the assessment should be too restrictive in this regard. In addition, contextual submissions are particularly important in documenting a journey of improvement against lagged data.

Proposal 8: Assessment and decision making

Question 8a: *What are your views on who should carry out the assessments? You could include suggestions for how we can enable more assessors (both academic and student) from small, specialist or college-based providers to take part*

CABS response: Given the intention is to conduct TEF assessments on a rolling basis with a certain set of providers being assessed each year, we think it makes sense to have a fixed panel of assessors to ensure continuity and consistency from one cohort of assessments to another.

Question 8b: *What are your views on only permitting representations on provisional rating decisions of Bronze or Requires improvement?*

CABS response: We think this is a sensible approach to avoid the OfS being overwhelmed with representations from providers who dispute their Silver award.

Proposal 9: Varying the approach for providers with limited data

Question 9a: *What are your views on our proposal for an alternative means of gathering students' views to inform the student experience aspect where we do not have sufficient NSS-based indicators? You could include comments on:*

- *the proposed approach to determining whether the NSS data is sufficient (this is expanded on in Annex G)*
- *the actions we are considering to improve the availability of NSS data for more providers*
- *how student views could be gathered through an alternative means.*

CABS response: Given the inherent limitations of the NSS and the fact that some providers will have student cohorts too small to meet the minimum thresholds for reliable reporting, it would be worth considering supplementary evidence to gather students' views. This could include evidence of how institutions respond to feedback. This would reflect the intent of the B Conditions and avoid over-reliance on raw satisfaction measures.

The NSS already places significant demands on institutional resources, particularly in encouraging students to respond, and this should be borne in mind when developing any plans to improve the completeness of NSS responses and coverage across institutions.

Question 9b: What are your views on our proposal not to rate the student outcomes aspect where we do not have sufficient indicator data? You could include comments on the proposed approach to determining whether the data is sufficient (this is expanded on in Annex G)

CABS response: Given our members' concerns about the reliability of some of the data used in the condition B3 metrics, especially small student cohort sizes, we support the introduction of the rules-based data sufficiency tests as proposed in Annex G. We look forward to further information on the alternative means by which evidence will be collected when the tests show that the data coverage is insufficient.

Proposal 10: Student evidence and involvement

Question 10a: What are your views on our proposed approach to including direct student input in the assessment of the student experience aspect for all providers? You could include comments on alternative ways of gathering student input where student submissions are impractical.

CABS response: We agree with the proposed approach to continue with a student submission to gather input on the experiences of students. This could be informed by or supplemented with focus groups with students, although there may be difficulties in incentivising students to participate in these activities. Furthermore, some institutions, including smaller ones, may find this challenging from a capacity perspective.

Question 10b: How could we help enable more student assessors from small, specialist and college-based providers to take part?

CABS response: No comment

Proposal 11: Assessment cycle

Question 11a: What are your views on our proposed approach to scheduling providers for their first assessments? You could include comments on:

- *the factors we should consider in scheduling assessments*
- *any types of significant events that should lead us not to schedule an assessment in that year*
- *the sequencing of TEF assessments and APP approvals.*

CABS response:

The six-month preparation period seems reasonable, and the cycle follows other practices such as those with OfSTED and PSRBs. However, some institutions, even large ones, may find themselves

under unreasonable pressure if time-consuming assessments coincide, which is highly likely. In a business school context we can imagine the coincidence of a specialist business accreditation such as the SBC, AACSB or EQUIS with the TEF assessment would overstretch even well-resourced schools.

Across the wider university, a major evaluation such as a British Medical Association inspection or similar PSRB assessment may also stretch resources, in a sector that is increasingly struggling to resource the growing burden of regulation. Most institutions would struggle to resource a TEF and an APP simultaneously since the senior staff involved are largely the same small group. We have already noted that the sector is expected to absorb increasing regulation and audit against a backdrop of financial pressures and constrained resources. A proportional approach is therefore needed for business schools.

Question 11b: *What are your views on our proposed approach to scheduling providers for subsequent assessments?*

CABS response: Although more frequent assessments for Bronze institutions is proposed as a means of enabling them to improve their rating more quickly, this will also entail increased costs compared to Silver and Gold institutions, placing further financial pressure on institutions that may already be in difficulty.

Proposal 12: Risk monitoring

Question 12: *Do you have any comments or evidence about the factors associated with risks to quality that might be included in the draft risk monitoring tool at Annex I?*

CABS response: The factors associated with risks to quality listed in the draft risk monitoring tool are comprehensive and reflective of the likely risks to student outcomes and experience. However, we look forward to further details as to how the risk monitoring tool will be used in regulatory practice.

Proposal 13: Incentives and interventions

Question 13: *Do you have any comments about the proposed set of incentives and interventions associated with TEF ratings? You could include comments on:*

- *the principle that growth in student recruitment should take place at high quality providers*
- *the potential to link eligibility for new DAPs awards, or extensions to existing DAPs, to higher TEF ratings*
- *the approach to determining a breach or increased risk of breach, following TEF rating decisions*
- *whether there are any other incentives and interventions we should consider.*

CABS response: Our members are concerned about the potentially punitive nature of the proposed interventions which could restrict financially challenged providers from growing their student numbers and in a worst-case scenario contribute to a provider having to exit the market, resulting in significant disruption for students. As the system proposes to reward providers which perform better under the proposed metrics and potentially punish those which don't, there is a risk that Silver and Gold providers become stronger as they recruit a larger share of the student population at the expense of Bronze providers some of which may have had restrictions on their ability to recruit imposed by the OfS.

The proposed measures need to strike the right balance between incentivising continuous improvement in student outcomes and experience whilst not being overly punitive to the point where the existence of providers is put in jeopardy.

Currently TEF Bronze indicates that the **student experience and student outcomes are typically high quality**, and there are some very high quality features.

We would be concerned that some of the potential interventions meant that a 'Bronze' institution could be subjected to measures which are overly punitive and incongruent with their 'Bronze' award status. We feel that punitive measures should only be applied to institutions that have been judged to require improvement, and not to those holding a Bronze award.

It should also be pointed out that TEF measures an institution's overall approach to teaching quality and other outcomes and not the quality of individual degree programmes. As course quality is not uniform across institutions, linking tuition fees to TEF outcomes could result in students paying higher fees for lower quality courses in situations where there is a mismatch between the provider's overall TEF rating and the quality of a particular course.

There is a wider question about the usefulness of the TEF exercise to stakeholders beyond enabling the OfS to determine factors such as eligibility for fee uplifts and it is not clear if there is evidence that TEF outcomes serve as external market signals for prospective students and other stakeholders. Currently TEF enables providers using the metrics to improve their provision.

A final point is that any measure that has an adverse financial impact will further impair universities' ability to deliver research that is vital for driving innovation and productivity growth in the UK. On average research grants cover only 80% of the Full Economic Cost which means that the remainder has to be subsidised by the institution itself. The cost involved in responding to a new regulatory framework and the potential for the imposition of measures to reduce a provider's ability to recruit students or the removal of their eligibility to up-lift fees will only reduce the financial viability of the university and its research programmes.

Proposal 14: Published outputs

Question 14a: What are your views on the range of quality assessment outputs and outcomes we propose to publish?

CABS response: We agree with the proposal to publish the outputs specified with the exception of announcements of investigations into specific regulatory concerns at a provider prior to the conclusion of that investigation. We have previously expressed our concerns about the way in which the investigations into breaches of condition B3 were handled in 2023 which presumed guilt prior to the conclusion of the investigations. This causes reputational harm to institutions and may be unwarranted if the investigation subsequently finds no wrongdoing.

We note that the OfS is still following the practice of publicly announcing investigations as they begin which does impact on the reputation of the institution during the investigation until they are cleared of wrong-doing or otherwise.

Question 14b: Do you have any comments on how we could improve the usefulness of published information for providers and students? You could include comments on areas such as:

- *whether the OfS should have a role in sharing good practice, and how we should do so*

- *the presentation of TEF outcomes for providers that are not rated for student outcomes.*

CABS response: Thorough research and testing with students of the proposed information to be published is key as they are after all the intended audience. OfS' own research into the TEF 2023 highlighted that undergraduates consistently described TEF outcomes as too broad to inform course decisions and many struggled to understand distinctions between Gold and Silver awards.

A lack of familiarity with the TEF and the proposed change in definition for a 'Bronze' rating may easily cause confusion so careful consideration is required on how to present the new ratings and associated data. A thorough communications strategy is essential to ensure that the change in the meaning of a 'Bronze' award from being above the minimum requirements to meeting the minimum requirements is clearly understood by all stakeholders, and especially students.

Furthermore, if the proposed approach to the new rating system results in a significant reduction in the number of Gold institutions, this would likely impact on the perceived quality of UK higher education across the global market and make it more difficult for the sector to maintain and grow its market share against competitor countries.

We are very much in favour of the proposal for the OfS to share with the sector insights and areas of good practice across a range of assessments. This is in the spirit of continuous and constructive improvement and will be appreciated by providers.

Proposal 15: Implementation timeline

Question 15: *Do you have any comments on the proposed implementation timeline?*

CABS response: No

Question 16: *Do you have any comments on the two options we have set out for how we could approach publication of TEF ratings during the transitional period, or suggestions of other approaches we could take?*

CABS response: In the interests of transparency and students' awareness it is probably wise if providers are permitted to publicise their TEF 2023 rating until they are awarded a rating under the new scheme.

Question 17: *Do you have any comments on our approach to ongoing development, or our plans to prepare for the future inclusion of taught postgraduate provision?*

CABS response: As already mentioned in our response to Q3, we think it is important that PGT provision is included in the TEF at the earliest opportunity.

Next steps

Question 18: *Are there aspects of the proposals you found unclear? If so, please specify which, and tell us why*

CABS response: As per our response to question 7, the explanation of the benchmark indicators and minimum thresholds for the student outcomes aspect on pages 33-34 is not easy to understand.

Question 19: *In your view, are there ways in which the objectives of this consultation could be delivered more efficiently or effectively than proposed here?*

CABS response: The proposed regulatory changes are significant and should therefore be introduced in a timed and proportional manner to reflect the higher education sector's current deep financial crisis. We would like to see a phased implementation plan that focuses on the priority problem areas first and we would expect to see such a significant development happening over an extended period of time, with clear markers for the sector on the significant stages of the journey to reach the ideal outcome.

It is our position that the OfS should look to tackle instances of poor practice within the sector rather than introduce complexity and costly new regulatory systems that risks labelling the whole UK sector as underperforming.

About the Chartered ABS

We are the voice of the UK's business and management education sector. We support our members to maintain world-class standards of teaching, research, and enterprise engagement. Through dialogue with policymakers, business, and stakeholders, we inform government policy to help create the best possible environment for our business schools, the economy and wider society to flourish.

Business and management graduates go on to lead organisations across the corporate, public and third sectors, contributing to our dynamic economy. The research undertaken in UK business schools has impact across society and helps to turn our capacity for invention into viable businesses.