

## **Arts SU response to the Office for Students consultation on the future approach to quality regulation**

### **Proposal 1: A more integrated overall system**

*We propose to modify the overall quality system to ensure that it is integrated, drives improvement across the sector, and provides a clear view of the quality delivered by different providers.*

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

We support, in principle, the aim of a more integrated quality system, but share our university's concerns about the proposed standardised approach.

As a specialist arts students' union, we are worried that many of the metrics proposed do not align well with specialist institutions, particularly those focused on creative subjects, where graduate careers and earnings patterns look very different from other disciplines.

If TEF ratings are linked to fees, student numbers or World Leading Specialist (WLS) funding, this could undermine the financial sustainability of institutions like ours, and in turn threaten the pipeline of skilled graduates into the creative industries at exactly the point when government policy is seeking to grow them.

From a student perspective, it is also important that the integrated system clearly distinguishes between minimum regulatory requirements and recognition of excellence, so that TEF continues to feel like a positive quality mark rather than primarily a compliance mechanism. The overall framework must be explained in a way that is understandable to students, not only to regulatory specialists.

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

We support the aim of reducing duplication between TEF and Access and Participation Plans, where this frees up time and resources to be directed into improving student experience and success.

For a specialist arts provider, a lot of work on inclusion is embedded in curriculum and pedagogy (such as decolonising practice, community-based projects and inclusive studio teaching). TEF and APPs should be allowed to draw on a shared evidence base for this work, while avoiding double-counting negative outcomes for the same students.

It is important not to "double penalise" institutions that recruit and support under-represented arts students by treating the same challenging outcomes as both a TEF quality concern and an APP risk.

### **Proposal 2: Providers in scope**

*We propose to assess and rate all OfS-registered providers through the future TEF, on a cyclical basis, with rolling assessment cycles.*

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

We broadly support assessing all OfS-registered providers through TEF. Students at small and specialist institutions should have access to TEF information that is comparable to that available for students at larger generalist universities.

However, this must be accompanied by a robust, transparent approach to contextualisation, so that providers with a strong focus on creative disciplines are not unfairly judged by indicators that were primarily designed around other subject areas.

It must also be accompanied by clear communication that being a subject-specialist provider (particularly in the arts) will inevitably shape outcomes data, and that this is considered in panel judgements.

**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?**

**Proposal 3: Provision in scope**

*We propose to assess undergraduate provision in the first cycle of assessments and to extend the scope to include postgraduate taught provision in the second cycle.*

**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**

We support focusing initially on undergraduate provision, including foundation and integrated foundation years. These are key access routes into creative higher education for many of our students, particularly those from non-traditional or under-represented backgrounds.

On apprenticeships, we support their inclusion where numbers are sufficient, but note that creative apprenticeships are still developing, and success can look different (for example building a portfolio, credits or early freelance work). Metrics for these routes need to reflect that reality.

On partnership provision, we agree that it is important to look at it separately, because students based at partner institutions should have the same level of quality and access to creative resources as those at the main campus. At the same time, weaker or stronger partnership provision should not distort the overall picture of the main specialist provider, while still ensuring that the main provider is accountable for partner quality.

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

We support, in principle, the inclusion of taught postgraduate (PGT) provision in future cycles, but believe that PGT students in creative disciplines often have different profiles and motivations (for example, career changers, established practitioners, international students), and this needs to be reflected in the evidence and indicators used. Short-term employment and earnings data is likely to be even less representative of PGT outcomes in the arts, where success may involve artistic recognition, commissions, fellowships or community impact rather than conventional “graduate jobs”.

We would welcome further consultation specifically on PGT metrics and evidence in creative disciplines, involving PGT students and alumni.

#### **Proposal 4: Assessment aspects and ratings**

*We propose to assess and rate providers for ‘student experience’ and ‘student outcomes’, and to generate ‘overall’ provider ratings based on these two aspect ratings*

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

We agree that “student experience” and “student outcomes” are the right broad aspects to consider, but we are concerned that the nuances of our student experience and graduates experience may be lost in the ways the OfS is proposing to measure them.

For students at a specialist arts university, student experience (including access to studios, workshops, equipment, technical support and engaged staff) is fundamental to the value of their degree, but must be understood in the context of the type of education that is being delivered.

Student outcomes are important, but need to be understood in the context of creative, freelance and portfolio careers, where earnings and job titles in the first few years do not tell the full story.

We share our university’s concern that the use of lagged data could lock providers into ratings that do not reflect improvements students are actually experiencing. From a student perspective, we are also concerned that changing the meaning of “Bronze” so that it effectively becomes a label for meeting minimum requirements will be confusing, and could undermine confidence in the framework.

##### **Question 4b Do you have any comments on our proposed approach to generating ‘overall’ provider ratings based on the two aspect ratings?**

We are concerned about the proposal that the overall rating should simply be the lower of the student experience and student outcomes ratings.

From the perspective of our students, this removes space for panels to make a balanced judgement “in the round”, taking into account improvements in either aspect. It creates a risk that providers at Bronze are pushed into a downward spiral: facing fee caps, fewer funding opportunities and limitations on student numbers that make it harder to invest in improvements, while higher-rated providers have more resource to pull further ahead. It is particularly problematic for creative providers where structural features of the labour market depress outcomes data even when student experience is strong.

We would like to see an approach where excellent student experience cannot be rated too low purely because of subject-driven employment patterns, and narrative contextualisation can explain where outcomes are shaped by creative labour markets and wider economic conditions, rather than by the quality of teaching and support.

### **Proposal 5: the student experience aspect**

*We propose to:*

- *align the scope and ratings criteria for the student experience aspect with the requirements of conditions B1, B2 and B4*
- *assess the student experience on the basis of provider submissions, an expanded set of NSS-based indicators, and additional evidence from students.*

### **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?**

We welcome alignment with conditions B1, B2 and B4, which reflect areas students tell us are important, including course quality, learning opportunities, resources and fair assessment.

For a specialist arts provider, we think it is important that course content and delivery explicitly includes practice-based, studio-based and crit-based learning, performances, exhibitions and collaborative projects, not just lecture and seminar formats.

We also would like the OfS to ensure Condition B2 is interpreted to include access to physical resources such as studios, workshops, specialist equipment and technical staff, alongside digital resources.

Finally, we believe it is important Condition B4 takes seriously the challenges of subjective assessment in the arts, emphasising transparent criteria, robust moderation and processes to minimise bias.

### **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.**

At provider level, the criteria for “course content and delivery” should avoid assuming a traditional lecture-seminar model and instead recognise the value of time and space for experimentation and failure as part of a high-quality creative education.

The system should give credit where providers co-create curricula and assessment with students, including work to decolonise content and embed industry engagement.

We believe removing the NSS “Organisation and Management” indicator risks deprioritising issues such as timetabling, communication and course administration, which students consistently tell us are central to their experience. We would like to see this area remain visible within the criteria.

**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.**

We support using NSS indicators, including the learning opportunities theme, but with important caveats. Single-year NSS results can be volatile for small cohorts and for creative subjects, so multi-year averaging and careful handling of small samples will be important. We also believe NSS should sit alongside qualitative and documentary evidence, such as course approval and review documents, external examiner reports, and evidence of student/staff partnership.

We believe the framework must recognise that high-quality teaching and learning can look very different across disciplines. Studio and workshop teaching, crits and performances will naturally generate different patterns of student feedback compared with more traditional forms of delivery.

As a large specialist provider in creative arts and a London institution, our survey results and benchmarks are dominated by a small number of subject areas and a regional context that are known to show systematically lower satisfaction. While benchmarking helps, it does not fully address this, and we would like to see more explicit space for subject- and region-specific context in panel judgements.

We would be cautious about significantly reducing submission page limits if that would make it harder to explain these nuances. Clear guidance on focus and structure would be more helpful than strict cuts in length.

### **Proposal 6: a revised and integrated condition B3**

*We propose to revise and simplify our minimum requirements for student outcomes (condition B3) and integrate into the future TEF an assessment of whether a provider meets them.*

**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.**

We welcome the removal of a minimum numerical threshold for the progression indicator from B3. We think progression patterns should inform contextual understanding of student journeys rather than act as a hard trigger, especially in small creative cohorts where interruptions, repeat years and non-linear study patterns are common.

We are, however, concerned that integrating B3 more closely into TEF could make TEF feel primarily punitive rather than developmental. It is essential that subject mix, provider mission and the structure of creative labour markets are treated as core contextual factors when judging whether B3 is met. We also believe it is important the framework recognises the many factors outside providers' control that shape continuation, completion and progression, especially for diverse and commuter student populations.

### **Proposal 7: The student outcomes aspect**

*We propose to rate student outcomes based on benchmarked indicators of continuation, completion and a broader set of post-study indicators, and taking contextual factors into account*

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

We agree that graduate outcomes are important, but we have serious concerns about how the proposed metrics relate to creative careers.

Many arts graduates follow portfolio or freelance careers that look unstable or low-paid in the short term, but which represent successful and meaningful work aligned with their studies. Short timeframes (for example, around 15 months after graduation) are likely to capture a phase when graduates are still building a portfolio, networking and starting self-employment, rather than the long-term picture.

We also believe that graduate outcomes are significantly affected by wider labour-market conditions, such as recessions or periods of slow growth. If TEF ratings are linked to fees or student numbers, it is vital that providers are not penalised for macro-economic shocks rather than any change in educational quality.

**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?**

From our students' perspective, many graduates combine part-time employment with developing a creative practice. Earnings and job titles during this period do not reflect the quality or potential of their careers.

The current LEO methodology does not adequately adjust for full vs part-time work and may penalise specialist institutions whose graduates are starting their own businesses or combining multiple roles.

Entrepreneurship and creative start-ups are a positive outcome that government says it wants to encourage; we would like to see explicit recognition of this, even if early-stage pay and security are low.

We also note that there can be volatility in data for some subjects, such as performing arts, which needs further exploration. A substantial proportion of our students are international; many will build creative careers outside the UK and may have low response rates in surveys, raising questions about how they will be reflected in these indicators.

We would prefer a broader conception of positive outcomes that includes:

- Self-employment, freelance work and micro-enterprises in the creative industries;
- Further study, including teacher training and creative postgraduate courses; and
- Where feasible, qualitative indicators of job fit, satisfaction and contribution to cultural and community life, not just salary and SOC codes.

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

We support the use of contextual factors, but we think the proposed set is too limited.

For subject-specialist and London-based providers, we would like to see subject mix and the structure of the creative labour market treated as non-negotiable contextual factors in interpreting outcomes data. We would also like to see wider factors (including prior attainment, socio-economic background, disability, race, commuter status and international status) recognised as shaping outcomes.

Our student body is diverse and many students face multiple barriers. It would be wrong if providers that take on a greater share of these students were treated as "higher risk" simply because of who they serve.

## **Proposal 8: assessment and decision making**

*We propose:*

- *that TEF assessments would be conducted by an evolving pool of academic and student assessors, supported and advised by OfS staff.*
- *to adopt a risk-based approach for the assessors to give further consideration, when outcomes would have a potentially negative impact on a provider.*

**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.**

We welcome the inclusion of both academic and student assessors, supported by OfS staff.

From our perspective it is crucial that assessors have discipline or specialism expertise, including direct experience of practice-based learning in creative subjects. Without this, there is a risk that creative provision is judged against norms that don't fit. The assessor pool should include students and staff from small and specialist providers, not only from large generalist universities, to ensure a range of perspectives. Student assessors should be properly trained, paid and supported, with flexible arrangements that acknowledge the intensive and studio-based nature of many creative courses.

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

We are concerned that limiting representations to Bronze and Requires Improvement is too restrictive.

From a student point of view even a Silver rating can have significant reputational and financial consequences for a specialist arts university, potentially affecting course viability and investment in student support. Providers, and the students they represent, should be able to challenge decisions where there are serious concerns about how contextual factors were applied, or about data quality, regardless of whether the outcome was Bronze, Silver or Gold.

We would prefer an approach where representations are allowed wherever there is credible evidence of misapplied context, data issues or procedural concerns, not just at the lowest rating levels.

## **Proposal 9: Varying the approach for providers with limited data**

*We propose to:*



- *use an alternative means of gathering students' views, where we do not have sufficient statistical confidence in the NSS-based indicators for a provider.*
- *not rate the student outcomes aspect where we do not have sufficient statistical confidence in the student outcomes indicators for a provider.*

**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.**

We support the principle of using alternative mechanisms to gather student views where NSS data is insufficient, which is particularly relevant for small and specialist providers.

We would encourage the OfS to work closely with students' unions to design independent and accessible mechanisms, such as structured focus groups, interviews or online panels conducted by an independent organisation. They should also ensure strong protections for anonymity and freedom to speak honestly, especially in small cohorts where students may fear being identified. Finally the OfS should provide accessible formats and timings for international students, disabled students, commuter students and those with caring responsibilities.

**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).**

We support not issuing a student outcomes rating where data is genuinely insufficient, provided that: 1) This is clearly explained in published information and is not implicitly interpreted as a sign of poor performance and 2) students are still provided with meaningful information about outcomes, for example through qualitative case studies or narrative descriptions, where robust quantitative indicators are not available.

We would not want "no rating" to be treated as a default risk flag when the real issue is simply small cohort size or incomplete data.

## **Proposal 10: Student evidence and involvement**

*We propose to include direct student input in the assessment of the student experience aspect for all providers, and to expand the range of student assessors.*

**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.**

We strongly support including direct student input in the assessment of student experience for all providers.

To make this effective, students' unions (or equivalent bodies) must continue to have a defined role in co-ordinating and endorsing student submissions, to help ensure they are representative and independent. The OfS should provide resources or small grants to SUs at small and specialist providers to support student engagement work, consultation and drafting.

Where student submissions are impractical, we would support alternative mechanisms that still involve structured student voice, rather than relying only on provider-written narratives.

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

To enable more student assessors from institutions like ours, we suggest:

- Ring-fencing a proportion of student assessor roles for students from small, specialist and college-based providers.
- Making assessor roles paid and flexible, and where possible recognising them as academic credit or part of employability awards.
- Scheduling training and assessment work around the intensive studio-based timetables common in creative disciplines.
- Actively recruiting students from a range of creative disciplines (fine art, design, performance, fashion) to bring varied perspectives.

## **Proposal 11: Assessment cycle**

*We propose to:*

- *assess each provider for the first time within three years, according to a set of priorities*
- *link the timing of further assessments to the ratings awarded and our ongoing risk monitoring.*

**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.**

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

### **Proposal 12: Risk monitoring**

*We propose to introduce a risk monitoring tool that sets out the factors associated with increased risks to quality.*

**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?**

### **Proposal 13: Incentives and interventions**

*We propose to introduce a strengthened set of incentives and interventions that vary according to the level of quality and risk, to drive quality improvement across the sector.*

**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**

We understand the intention that growth in student recruitment should take place at high-quality providers. However, we have significant concerns about how “quality” is being operationalised, particularly for creative disciplines.

We share our university’s strong concern about any link between TEF ratings and World Leading Specialist (WLS) funding. The proposed metrics do not align well with creative institutions, and using them to determine access to specialist funding risks destabilising precisely those providers that underpin the UK’s creative industries.

From our members’ perspective, this could translate into cuts to courses, studios, workshops, bursaries and specialist support at world-leading creative institutions. It could also lead to a narrowing of the diverse talent pipeline into the creative industries, at odds with the government’s stated ambition to grow this sector.

More generally, if incentives and interventions based on TEF ratings focus heavily on short-term employment and earnings data, there is a real risk of shrinking creative provision even where student experience is strong and graduates are making substantial cultural and social contributions.

We would prefer an incentive system that recognises and rewards excellent student experience, student partnership and inclusive practice, as well as outcomes. It should also use TEF ratings to

trigger supportive, collaborative improvement work with students and SUs in the first instance, rather than immediately moving to punitive measures or restrictions on growth.

#### **Proposal 14: Published outputs**

*We propose to continue publishing the outputs and outcomes of our quality assessments, aimed at providing clear information to students about the level of quality delivered by different providers, and incentivising and supporting providers' efforts to enhance quality.*

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

We support continued publication of TEF ratings and related quality assessment outputs. These are important for prospective and current students when making decisions and holding providers to account.

For subject-specialist arts providers, it is especially important that published outputs include clear narrative explanations of the evidence considered and how context has been applied, not just a high-level rating. It is also important students can see what the rating means in terms of day-to-day experience (for example, teaching, facilities, support), not only technical interpretations.

#### **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**

To make published information more useful TEF outcomes should be presented in a student-friendly format, with concise summaries of strengths and areas for improvement. The OfS website should allow users to filter and compare providers by type and subject focus, so that specialist arts universities are not casually compared with providers offering entirely different portfolios. Student-voice content, including student submissions or summaries, should be prominent in provider profiles. For providers not rated for student outcomes, there should be a clear explanation of why, and alternative information provided, rather than leaving an ambiguous gap.

We would also welcome a role for the OfS in sharing good practice, including from specialist providers, through accessible case studies and resources that students and SUs can use locally to advocate for improvements.

#### **Proposal 15: Implementation timeline**

*We propose to consult further during 2026-27 and carry out the first cohort of future TEF assessments in 2027-28.*

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

**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?**

From a student perspective, the key priorities in the transitional period are clarity and continuity for current and prospective students about which TEF rating applies to their course, when it was awarded, and under which framework. Avoiding confusion caused by multiple overlapping rating schemes or sudden changes in how ratings are displayed mid-admissions cycle is important.

We would support any option that clearly labels ratings with their date and framework on the OfS website and provider materials, and avoids removing or substantially downgrading visible ratings before the new framework is fully implemented, which could leave students with less information in the short term.

**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?**

We welcome the commitment to ongoing development of the framework.

From a student point of view, we would like to see a structured process for regularly reviewing how TEF is working for subject-specialist and creative providers, with explicit opportunities for students and SUs at these institutions to feed in. Evaluation of the impact of TEF ratings on course portfolios, including any unintended consequences such as reductions in arts provision linked to outcomes metrics must also take place.

For the inclusion of PGT provision, we think it is essential that PGT students and alumni from creative disciplines are directly involved in designing appropriate evidence and indicators, and any proposed PGT metrics are tested to ensure they fairly reflect the diverse outcomes of postgraduate creative education.

## **Next steps**

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

From perspective of our members, we found the following aspects unclear:

- The precise relationship and weighting between the student experience and student outcomes aspects in determining the overall rating, and how this will be explained to students.
- How contextual factors will be applied in practice, especially for subject-specialist and London-based providers, and how this will be made transparent in published information.

- How “no rating” for student outcomes (due to insufficient data) will be displayed and interpreted, and what assumptions students and other stakeholders are expected to make about such cases.

**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?**

Piloting and co-design with diverse providers and students

Before full roll-out, the OfS could pilot aspects of the new framework with a diverse group of providers (including at least one large specialist arts institution) and their students’ unions. This would:

- Identify unintended consequences early
- Help refine guidance, evidence expectations and student-voice mechanisms to be more realistic and proportionate.

Aligning and re-using existing data and student-voice mechanisms

We would encourage the OfS to:

- Make maximum use of existing datasets and surveys (NSS, Graduate Outcomes, internal student surveys) before creating new data collections
- Co-design student-voice processes with SUs, to minimise duplication between TEF, APPs and local quality assurance, and to ensure that the information collected is genuinely useful to students.