

# Sector Survey Report 2024

Exploring the  
capabilities  
universities need  
to thrive in a  
challenging  
landscape

# 1.0 Executive Summary

This report examines the role of innovation within the regulatory framework for English higher education institutions (HEIs). Using the institutional capabilities required to respond to regulatory change as a lens, we examine the ways in which regulation can support or inhibit innovation within this part of the sector. Our intention in publishing this report is to generate debate and foster a dialogue to provoke meaningful change.

This report has been informed by a survey and qualitative interviews conducted in 2023. The focus has been English higher education institutions operating under the conditions of registration and regulatory framework as prescribed by the Office for Students (OfS), and the higher education regulatory environment in England.

We sought views on:

- higher education institutions' ability to respond to regulatory change,
- key capabilities required to respond to regulatory change, and
- how well-established these capabilities are within higher education institutions.

We also asked participants their views on threats and opportunities posed by the Department for Education's (DfE) reform agenda.

# 1.1 Key findings

## **HEIs are confident in their ability to respond to regulatory change:**

- Most HEIs rank themselves highly on their adaptability to regulatory change; however, larger universities often expressed lower confidence in their institution's adaptability in the face of change.

## **There is a perceived gap between the importance of certain capabilities against how well-established they are in HEIs:**

- When looking at the capabilities ranked as the most important for successfully responding to regulatory requirements, we see a gap between how important the capabilities were ranked and how well established they are in HEIs. In fact, those capabilities ranked as most important were also deemed to be the least established.

## **HEIs may not be as prepared for change as they claim to be:**

- Despite a widespread acknowledgment of the significance of certain capabilities, institutions are struggling to implement them effectively. This lag could be attributed to a lack of awareness within institutions regarding how proficiently these essential capabilities are integrated into their own structures.

## **Department for Education's reform agenda is potentially destabilising:**

- While there is hope for the positive change these reforms will bring, there is also some concern about the potential destabilising effects these could have on the sector. Participants commonly express the sector generally does not have the right capabilities or resources – such as adaptability or finances – to successfully respond to and implement such broad-ranging reforms.

## 1.2 Provocations

The findings give rise to some interesting provocations when the following themes are applied:

- **Scale**
  - How does the size and shape of an institution impact its ability to adapt and respond to change?
- **Institutional culture**
  - How does institutional culture impact an organisation's ability to respond to change?
- **The regulator's ability to foster innovation**
  - How far is it possible to regulate while also fostering innovation?

## 1.3 Implications

Our report concludes with further questions arising from the outcomes. We intend for the questions posed in the conclusion to act as a catalyst for dialogue and debate to spur further research and to prompt meaningful change.



## 2.0 Methodology

This research aimed to gather a wide range of views from English HEIs, and associated professional bodies, on the capabilities required to respond to the opportunities and challenges of the regulatory framework for English higher education, as prescribed by the OfS.

An open survey was created (see Annex 1) which used Likert scale questions to determine the overall perception of the capabilities both required and present within institutions to respond to regulation. The survey was made available to the sector via the Strive Higher website, targeted LinkedIn promotion and through hyperlinks in Strive Higher team email banners. A further promotion of the survey was undertaken after the first three months. The survey remained open and actively promoted for six months.

Alongside this, ten targeted interviews were conducted with senior professionals within English HEIs with some responsibility for responding to regulation from the OfS. These individuals were selected to represent a wide range of institution types and sizes. Published HESA data and other open source information was used to enable classification of institutions into categories dependent on their size and shape.

The survey data was analysed by Strive Higher and combined with free text analysis of the interviews to draw themes and conclusions on the questions asked.

We do not claim that this constitutes a statistically significant sample but given the alignment between survey responses and the feedback from qualitative interviews, we are comfortable that the findings do represent a reasonable snapshot of sector sentiment to prompt discussion.

## 3.0 Capabilities

We identified eight key institutional capabilities required to respond to change. These were:

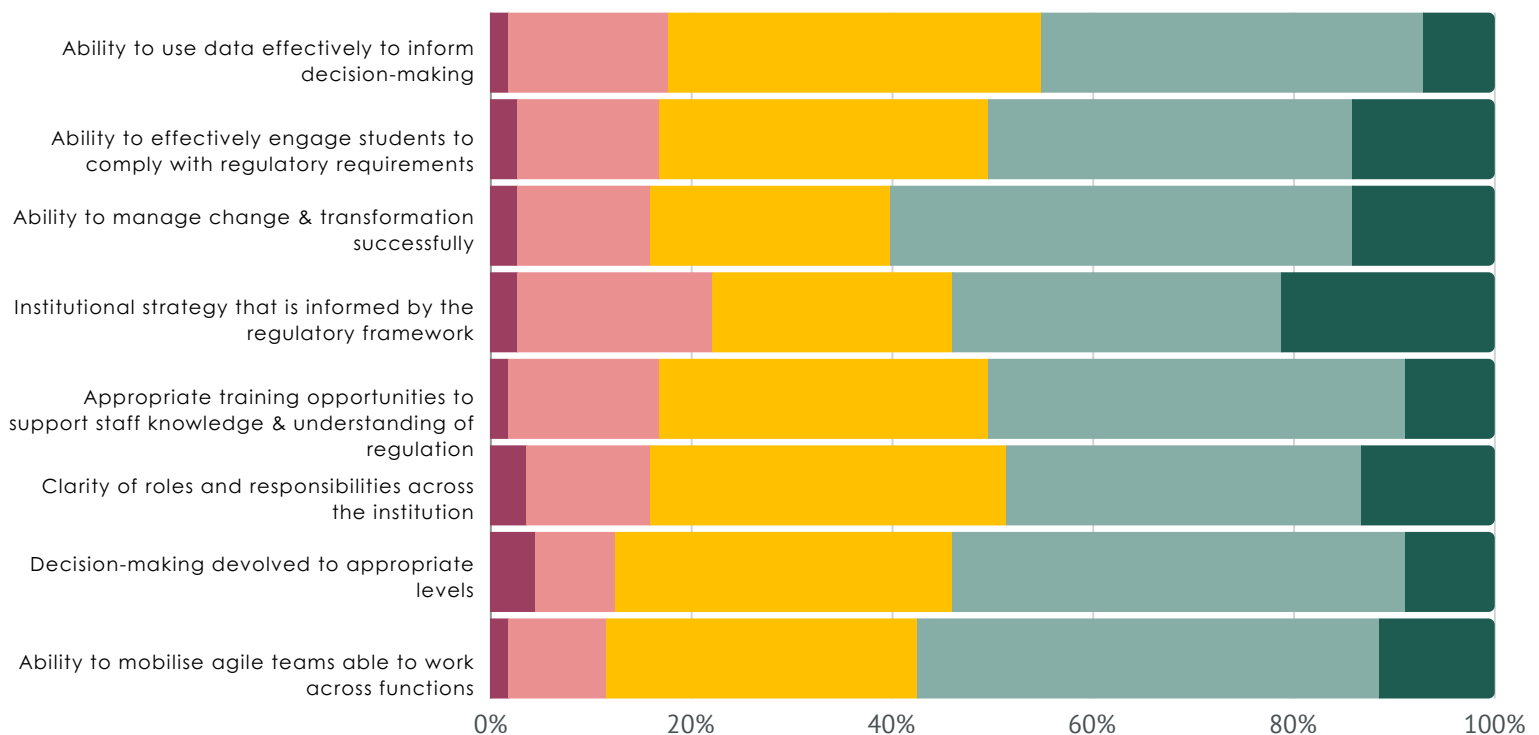
- Using data effectively in decision-making
- Effectively engaging students in regulatory change
- Ability to run successful institutional change projects
- Adaptable institutional strategies
- Staff training
- Clarity of roles and responsibilities
- Devolved decision-making at the appropriate levels
- Ability to mobilise teams to work across departments and services

These capabilities were identified by Strive Higher as those commonly cited as factors for successful change within institutions. We recognise that this is not an exhaustive list, and that there will be other capabilities institutions would identify as being important. However, the purpose of identifying this discrete group of capabilities was to provoke debate about the role of regulation and the factors within institutions which enable innovation and change. They provided a consistent lens through which these ideas could be examined further. Further research on the wider types of capabilities required by institutions in the future may also be of interest to the sector.

### 3.1 Key capabilities for responding to regulation

Our survey asked respondents to consider how important certain capabilities were in enabling an institution to respond to regulation. Respondents agreed that all the identified capabilities had some level of importance in enabling them to successfully respond to regulation.

*How important do you think the following capabilities are for an institution to successfully respond to regulatory requirements?*



However, those we interviewed articulated a tension between equality vs equity of regulation, and the way in which this can inhibit the responses an institution is able to provide. The OfS currently regulates in an equal way, conditions of registration and reporting requirements apply regardless of size and shape.

From our conversations, it is not clear that this is equitable across providers, with some needing to do substantially more work to comply with the OfS:

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*You are expected to comply irrespective of size...and this can be more challenging for specialist institutions where you lack the expertise to be able to fulfil returns.*

-Interview response

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*There are a lot of...burdens, and we don't have any strategic planning function...when you're speaking to the OfS about regulation it's the same people working on multiple different regulations, whereas in a larger institution you have multiple people, or people whose only job is to write an access and participation plan. There's no accounting for this from what I can see in the OfS.*

-Interview response

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*'Every request equals time and money. These are things we don't have in abundance and while trying to balance so many competing demands.*

-Survey response

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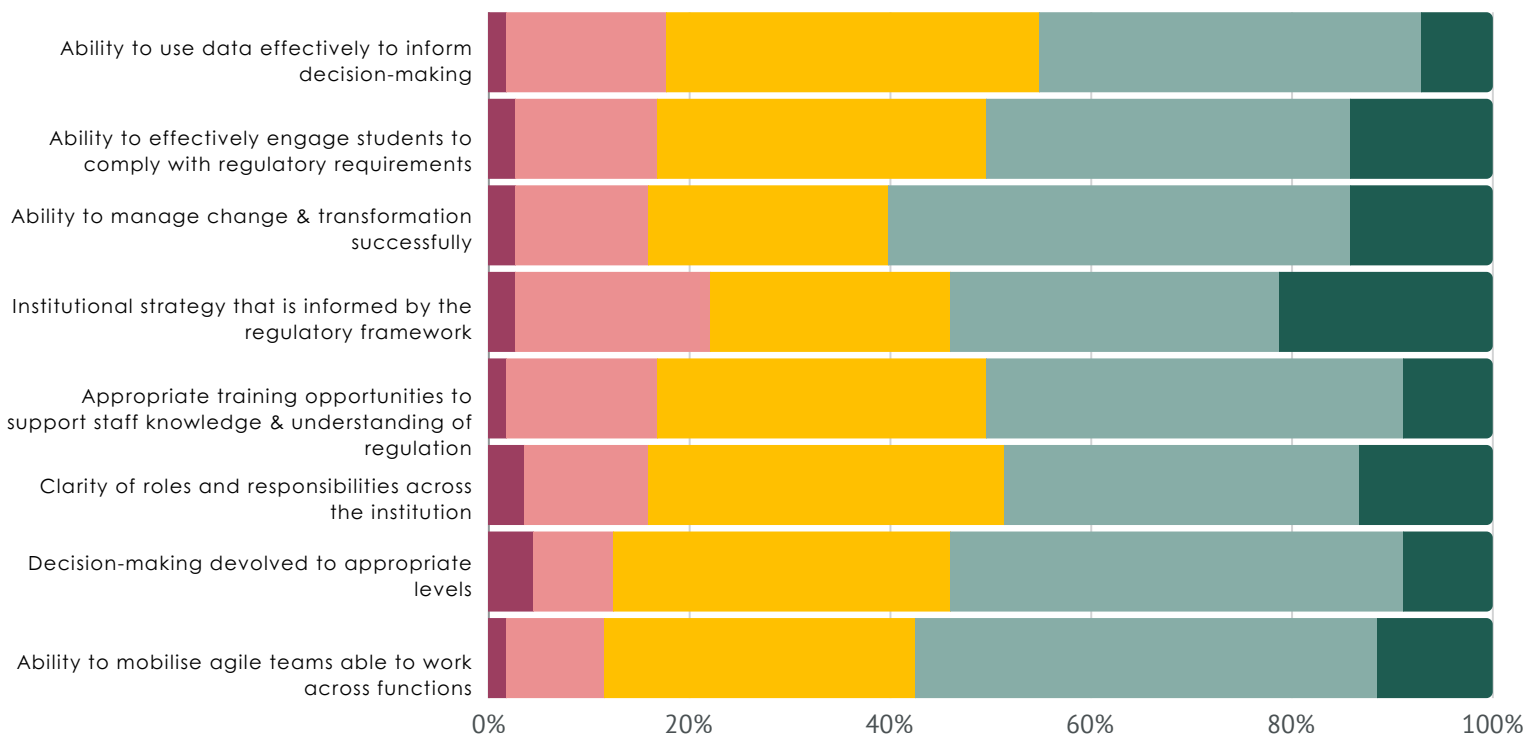
Whilst there was general agreement that the capabilities identified are important, there was also an articulated difficulty in how that capability need can be met within smaller institutions – particularly where there was not the breadth of team to support a response.

That being the case, how realistic is it for the OfS to encourage innovation and facilitate new entry to the sector when the opportunity costs for these, likely, smaller organisations is so high? Does this also mean some providers can only strive for 'good enough' due to size implications, while others can aim for 'gold plating'? This led us to examine further the general views as to how regulation is perceived within institutions.

### 3.2 How well-established these capabilities are within HEIs

The ability of any institution to foster innovation is contingent on their capabilities. Our survey asked about perceptions of how established these capabilities were within English HEIs. We found the majority of respondents agreed that all the capabilities we raised were established in some form:

*How well established are these capabilities in your institution?*

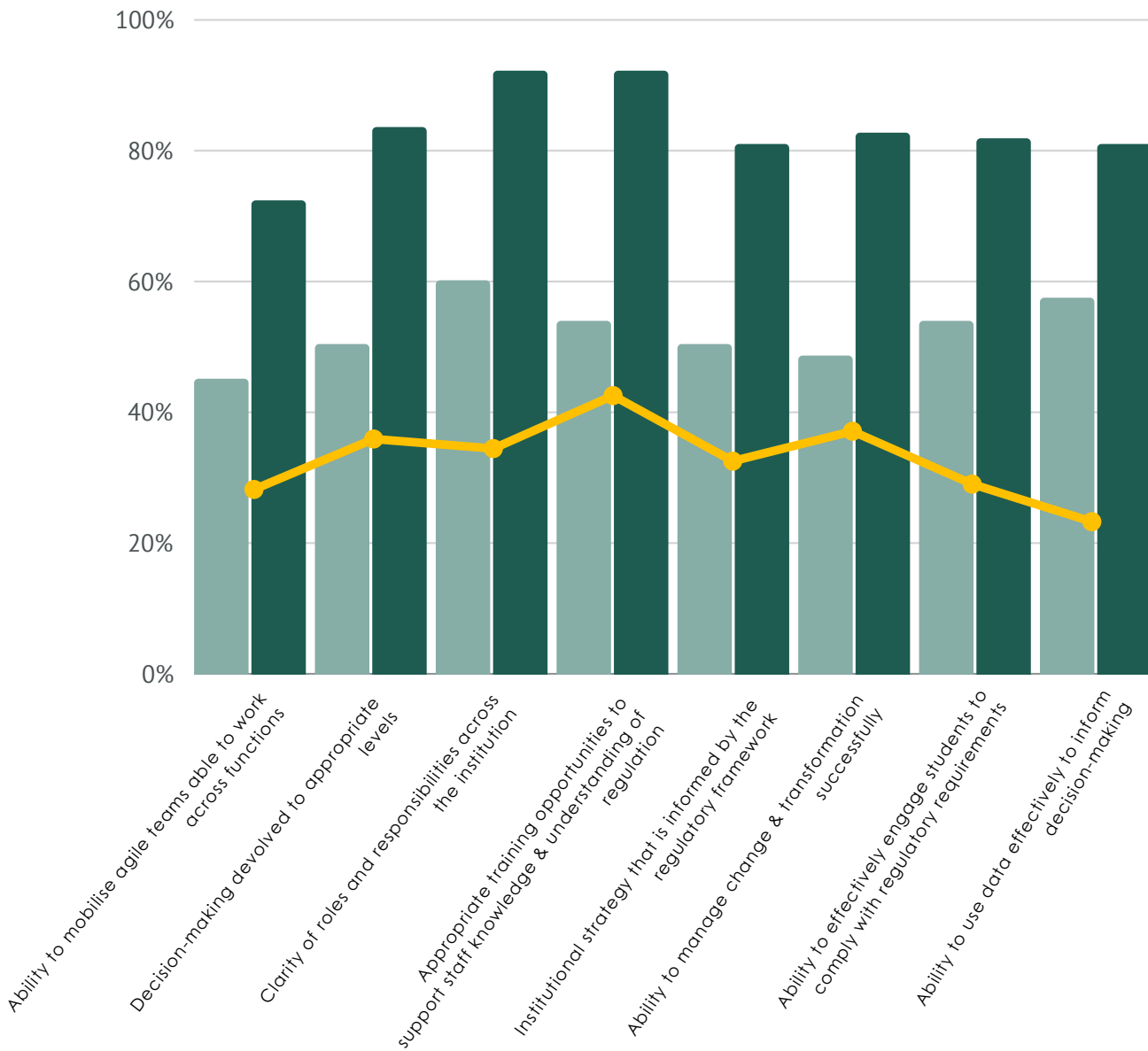


However, those we interviewed articulated a tension between equality vs equity of regulation, and the way in which this can inhibit the responses an institution is able to provide. The OfS currently regulates in an equal way, conditions of registration and reporting requirements apply regardless of size and shape.

From our conversations, it is not clear that this is equitable across providers, with some needing to do substantially more work to comply with the OfS:

Whilst these capabilities were reasonably established within institutions, we saw a gap between this versus how important the capabilities were ranked previously in the survey.

Capability gap



There were also some structural issues raised in terms of provider culture when it comes to innovation. These included:

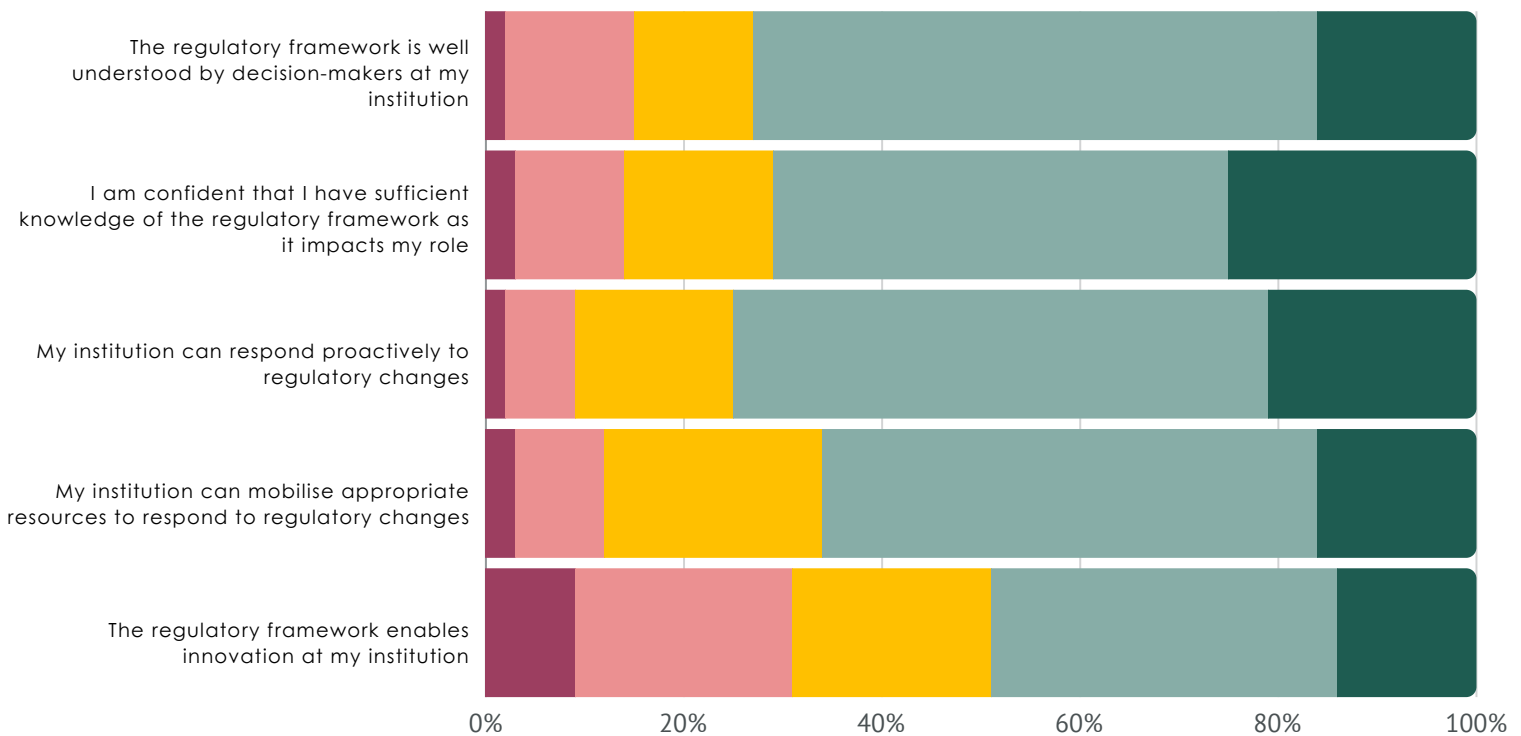
- A common concern raised relating to significant innovation in learning and teaching was that there may be intervention from the OfS in terms of quality and standards. The OfS has launched several quality investigations, targeted recently at business and management courses[1] chosen because of ‘...significant variation in performance across the sector, as shown in intelligence drawn from student outcomes data and National Student Survey responses’. However, it has not always been clear what indicator triggers such a review. Diana Beech, Chief Executive of London Higher, commented as such in 2022 for HEPI: ‘...affected providers will not know what aspects of their performance has triggered these investigations’.[2] Since 2022, we have seen some quality investigations emerge, including one at London South Bank University. After the investigation their Vice Chancellor, Professor David Phoenix, reflected: ‘It is evident in our final report that there is still no clear explanation for why we were selected...’.[3] Good regulation relies on a level of consistency and understanding from the regulated party of the standards they operate within. There is some concern that the lack of transparency on how quality and standards investigations are initiated may lead to providers inhibiting innovation in learning and teaching and experimenting as they do not know whether this could trigger an investigation.
- There may be little incentive for innovation based on the metrics which influence and shape higher education. Student choice is shaped by league tables, which rank institutions on metrics covering student outcomes, experience and other quality measures. Innovation requires experimentation and, often, failure, but as the driving factor of ranking is weighted towards student experience, providers may be encouraged to utilise tried and tested teaching methodologies rather than innovate their practice.

### 3.3 Attitudes to regulation

Our survey asked about the level of agreement with a range of statements on regulation. We found that most respondents agreed that:

- The regulatory framework is well understood by decision-makers,
- Respondents themselves are confident they have sufficient knowledge of regulation as it impacts their role,
- Respondents felt that their institution can respond proactively to regulatory changes,
- Respondents feel that their institutions can mobilise appropriate resources in response to regulation,
- The regulatory framework enables innovation.

*To what extent do you agree with the following statements?*



Our feedback suggests institutions feel there is a reasonable level of autonomy in the way in which they respond to regulation.

Institutional autonomy is at the core of many debates about a university's culture. The Higher Education Research Act (HERA) 2017 states clearly that in performing its functions '...the OfS must have regard to the need to protect the institutional autonomy of higher education providers'.<sup>[4]</sup> Susan Lapworth, CEO of the OfS, has stated that 'Institutional autonomy gives universities, college, and other higher education providers the freedom to be creative in their pursuit of knowledge, their curricula and the running of their business'<sup>[5]</sup>. Yet we found tensions with utilising this autonomy in several universities in our interviews:

- Some commented that there are issues in defining what the right level of senior input is into regulatory decision making. Responses to regulatory requests often must go through multiple individuals or committees, which may be creating internal burden within providers.
- The risk aversion and multiple checks and balances were symptomatic of perceived heavy-handedness from the regulator, and a lack of confidence over how to respond to regulatory inquiries. A specific issue highlighted was the reportable events process. Those we interviewed reported that it was not always clear what counted as a reportable event, and due to this ambiguity, there were often multiple reports into governance structures and a high amount of management of regulatory processes.

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*If OfS decide to investigate, they expect to see all this evidence which you will only have if you are doing belt and braces everywhere...The reason why you tend to be more risk averse is the OfS is really unpredictable, partially because it's new. If they decide to open an investigation, then they expect formalised minutes from meetings. Smaller providers don't have all of this governance support. This is not a deliberate burden, but it's one they've caused.*

-Interview response

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*When they [the OfS] started these B3 investigations, people were asking how they were going to go, and the answer was, 'when we've done a few then you'll see, and it'll be important that you read the report because then you'll understand how we're doing them'. That's not an answer. You need some kind of indication of what might happen.*

-Interview response

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*If OfS is taken at face value and you trust them, this idea that they're interested in seeing whether our approach to managing quality and standards are effective, rather than whether they meet an abstract set of principles, this opens up an opportunity to being more creative and flexible. The caveat there is whether you actually accept that the OfS is acting in good faith.*

-Interview response

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*Lack of clarity and clear decisions leads to paralysis and effort and resources being misdirected at anticipating future possible changes.*

-Survey response

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# 4.0 Provocations

## 4.1 Scale

The relationship between an institution's size and its ability to respond to regulation has been a point of debate within the sector.

The OfS applies its regulatory framework equally across higher education providers: the same baseline reporting requirements apply regardless of scale. The regulatory framework does not differ depending on size and shape, but the impacts of implementing it do.

Some reporting requirements have been deemed by the sector overall as overly burdensome, including:

- Condition B4, which sets out the OfS's regulation of assessment.[6] The OfS initially mandated the retention of all students' assessed work for up to five years post-course. For larger providers, this creates issues around the sheer volume of assessment they need to store. For small and specialist institutions, there may be practical issues with capturing assessed live performances or works of art. Subsequent guidance now suggests retaining a 'representative sample' instead, but this still appears burdensome, especially since only a fraction of retained work will likely be inspected by the OfS.

- Data burden. The higher education sector faces a significant data burden due to multiple returns requiring data submissions at varying intervals and formats, often from the same data sources. In the last ten years, alongside HESA returns, the sector has seen the introduction of APP, TEF, B3, and Graduate Outcomes - some of these returns are new, some are an evolution of previous returns. Most notably, the sector has seen the evolution of the HESA student data return into HESA Data Futures. As Andy Youell, who has led a project assessing data burden in the sector, has argued: 'Burden does not correlate to institution size so smaller institutions are disproportionately burdened'.[7]
- Student demographics. In response to the cost-of-living crisis, universities and colleges have put in place further resources for hardship funding. Some institutions, from having a greater amount of widening participation students, may have additional cost associated with support. Furthermore, additional opportunities, services and tailored interventions may need to be provided to support the successful outcomes of widening participation students, leading to greater burdens on staff. There is currently no way of quantifying the extra 'inputs' that are needed to support a diverse range of students, including those that need additional resource, within access and participation plans.[8]

As such, there are burdens on higher education providers which can disproportionately apply to those with a higher number of underrepresented students, small and specialist providers with less resource to respond to data reporting, and for those with diverse modes of assessment.

Any regulation, however, tailored to institutional size, shape and student makeup would be challenging in implementation. Some issues arise around:

- Consumer equality.
  - Students pay the same amount of money at undergraduate level in higher education currently, so should arguably be entitled to the same protections, and regulation should apply equally across providers.
  
- Calculating burden.
  - Burden is incredibly complex to calculate in the sector, and applying a differential regime across a hugely diverse sector would be challenging. This is even more challenging considering the multiple dimensions the OfS regulates, including quality and standards, access and participation and student outcomes.
  
- Institutional comparability.
  - The data held by HESA on things like student numbers and characteristics is helpful for long term sector planning. Other sources, such as the NSS and Graduate Outcomes informs applicant choice and quality regulation. Any consideration of burden between providers in terms of data requirements may mean that institutions are no longer comparable across the data, hampering choice and quality.

## 4.2 Institutional culture

Institutional culture, governance processes and expertise can impact the ability of an institution to respond to regulatory processes. The OfS's Chief Executive, Susan Lapworth, argued in a speech in 2022 that there have been some increases in internal bureaucracy in governance reporting systems over recent years, but that these were not necessarily effective: 'The assurance mechanisms have focused on process and not on substantive compliance.'<sup>[9]</sup> It was argued that institutional autonomy can be employed to minimise burden: 'It can sometimes feel like there is a lack of confidence in doing the right things for the right reasons and being prepared to explain that clearly in response to any regulatory enquiry'.<sup>[10]</sup> Often the response to this lack of confidence can be 'gold plating', which can be defined as going beyond processes needed to comply with regulation. The regulator's view is that institutions are over-complicating processes to comply from a lack of confidence, but is this view shared by the sector?

However, changing an institutional culture to enable a response to regulation, introduces some tensions:

- What is the right level of senior input into a regulatory inquiry? Many academic leaders have not been appointed because of their expertise in responding to regulatory requests. As such, it could be argued that regulatory expertise should be recruited and embedded at a senior level. However, there seems to be little appetite in centring all regulatory responses within professional services, particularly in quality and standards. What does the right governance structure look like which strikes the balance between regulatory compliance, efficiency and maintaining academic oversight?

- There is a tension within how to reduce internal bureaucracy when it is not clear what the OfS will request if they undertake a governance or quality investigation. Smita Jamdar, Partner and Head of Education at Shakespeare Martineau comments that: 'A decision to investigate will be based on interpretation and intelligence of which the provider is completely unaware and which will, by definition, relate to matters that have already occurred and therefore might no longer represent the current state of affairs.' [11] As there is no clarity regarding the intelligence that can be requested as part of an investigation, providers may err on the side of caution and attempt to increase compliance processes internally. However, as the OfS contests, this may create additional bureaucracy that proliferates process rather than dealing with substance. How does a higher education provider balance the right level of governance and assurance, in a changing and sometimes unclear regulatory landscape?



## 4.3 Regulator's ability to foster innovation

The OfS was founded explicitly as a regulator focused on fostering innovation. Its strategy for 2022-25 states: 'Above the baseline, we believe that autonomous providers making their own decisions is the best way to ensure the sector can flourish and innovate'.<sup>[12]</sup> However, issues have been raised with both the ability of a provider to foster innovation, and the ability and appropriateness of the OfS to foster innovation.

One key plank of the OfS's strategy 2022-25 was the consideration of: '...using small-scale regulatory 'sandboxes' for providers wishing to experiment in innovative and flexible approaches...'.<sup>[13]</sup> Instead of this experimentation, however, there has been an active crack down on particular courses without much indication of what led the OfS to launch particular investigations in the first place.

When considering the OfS's role in fostering innovation, certain tensions arise:

- The OfS is set up to employ a risk-based approach, and '...not to provide support for improvement activities, or to require the provider to take action the OfS would like to see'.<sup>[14]</sup> As such, the OfS is explicitly not established to encourage and incentivise innovative activity in teaching and learning, or to share best practice in this regard. It is established as a regulator that looks for providers to meet its conditions of registration, and monitors this over time.
- Furthermore, the OfS has been prescriptive in some areas of teaching and assessment previously, which may be seen as stifling innovation. In 2021, the OfS intervened to review assessment practices relating to spelling, punctuation and grammar<sup>[15]</sup>, and in its B4 Condition, has aimed to specify that providers should retain all assessed work in case the OfS should wish to assess it for compliance. This type of interventionist behaviour, without any 'safe' regulatory framework for innovation, may lead to a reluctance for providers to innovate in teaching and learning.

- The OfS is widely perceived to be politically motivated. The OfS was explicit in its spelling and grammar review, for example, that it decided to investigate practices after 'reports in the press'. The University of Huddersfield stated in the recent House of Lords Inquiry into the OfS: ' "political headlines are very quickly translated into OfS policy"', and there is a view that guidance letters from government are 'overly prescriptive' rather than providing '...higher level, strategic input'.<sup>[16]</sup> Innovation within this context, where new approaches to teaching and learning may be raised in press headlines which, subsequently, could translate to investigations, may mean that the OfS cannot encourage innovation in teaching and learning effectively.

## 5.0 Implications

In this report, we set out to examine the role of innovation within the regulatory framework for English HEIs. Using the institutional capabilities required to respond to regulatory change as a lens, we examined the ways in which regulation can support or inhibit innovation within this part of the sector. Our intention in publishing this report is to generate debate and foster a dialogue with a view to provoking meaningful change.

Our findings indicate that higher education institutions may need to:

- consider how adaptable they are in the face of change;
- identify and close capability gaps;
- consider how institutional strategy, operations and culture are best aligned to support volatility and meaningful transformation.

Those capabilities deemed most important by our respondents were (ranked in order of importance):

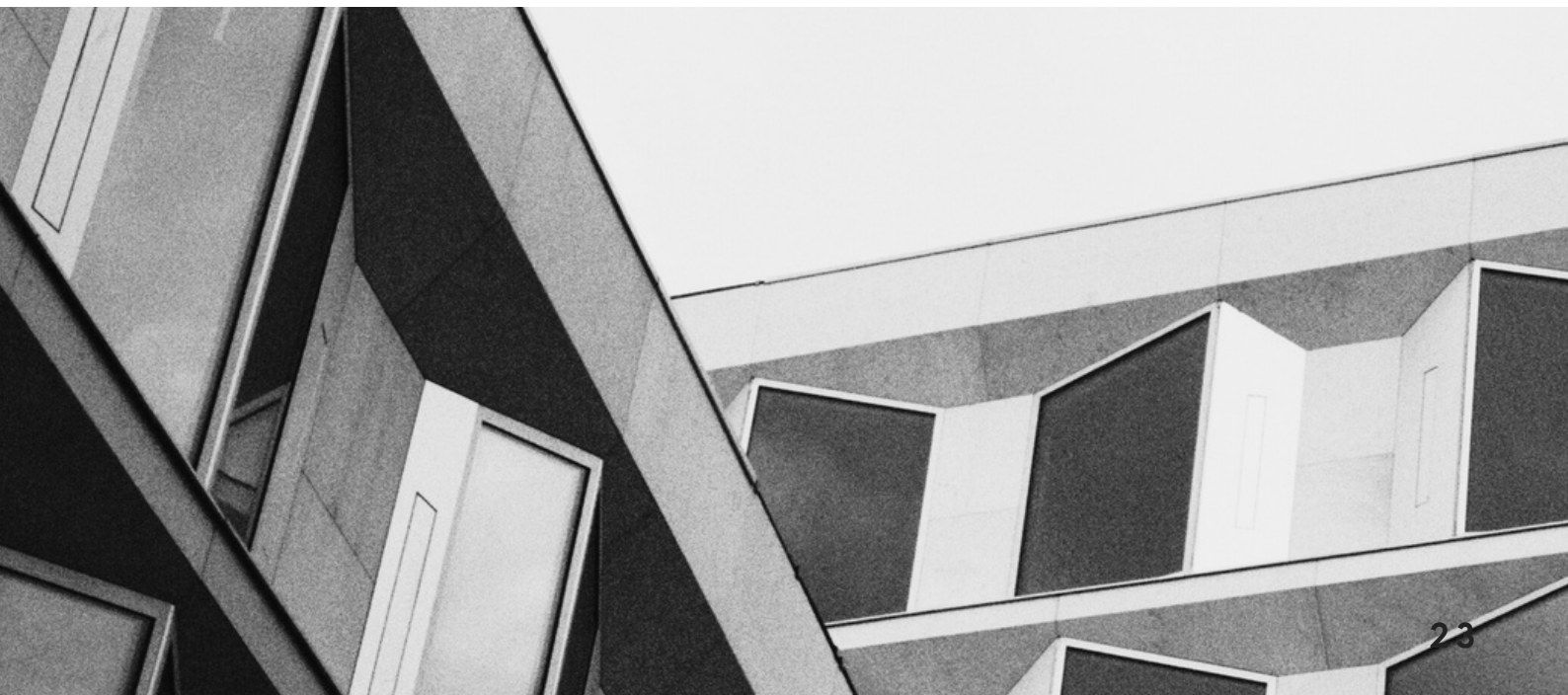
- Clarity of roles and responsibilities
- Appropriate training opportunities to support staff knowledge & understanding
- Decision-making devolved to appropriate levels
- Ability to manage institutional change projects successfully
- Ability to effectively engage students to comply with regulatory requirements
- Ability to use data to effectively inform decision-making
- Institutional strategy that can adapt to regulatory changes
- Ability to mobilise teams to work across departments and services

When considering their own capability gaps, this list (while recognisably not comprehensive) may provide a useful starting point for senior leaders to identify their institutions' learning and development, and strategy and transformation needs.

In addition to the provocations discussed herein (scale, institutional culture, and the regulator's ability to foster innovation), further areas for debate are highlighted. Posed as questions to prompt further research and insights, these include for example:

- What skills and capabilities are required to run a modern university?
- What changes will universities need to prepare for (regulatory, societal, environmental, financial)?
- How can universities identify and effect change from within?
- How can universities navigate change successfully?
- What does this mean for university business models and the way they operate?

If you're interested in contributing to further research or participating in a roundtable discussion on some of the themes identified herein, please do [get in touch](#).



# Acknowledgements

We wish to thank and acknowledge all those who responded to our survey. We are particularly grateful to those individuals who contributed to the qualitative interviews; to respect their anonymity they are not named but their institutions are referenced here, in no order:

- University of York
- Durham University
- University of Nottingham
- TEDI London
- Leicester University
- Aston University
- U92
- University of Surrey
- Arts University Bournemouth
- University of East London

We also extend our thanks to Chime marketing agency for their support on survey reach and engagement.

## Annex 1

### Survey Question Set

The OfS regulates English higher education institutions to ensure a baseline of protection for all students and the taxpayer. The OfS's stated approach to regulation is to put informed student choice and institutional autonomy at its heart. Beyond that threshold the OfS states it will encourage and enable autonomy, diversity and innovation.

Thinking about your own institution, please indicate how much you agree with the following statements:

1. The regulatory framework is well understood by decision-makers at my institution
2. I am confident that I have sufficient knowledge of the regulatory framework as it impacts my role
3. I understand the regulatory framework as it applies to my institution
4. My institution can respond proactively to regulatory changes
5. My institution can mobilise appropriate resources to respond to regulatory changes
6. The regulatory framework enables innovation at my institution

Please rank how important you think the following capabilities are for an institution to successfully respond to regulatory requirements:

- Ability to mobilise teams to work across departments and services
- Decision-making devolved to appropriate levels
- Clarity of roles and responsibilities across the institution
- Ability to use data effectively to inform decision-making
- Appropriate training opportunities to support staff knowledge & understanding of regulation
- Institutional strategy that can adapt to regulatory changes
- Ability to manage institutional change projects successfully
- Ability to effectively engage students to comply with regulatory requirements

## Annex 1

### Survey Question Set

Thinking of the capabilities you ranked in the previous question, how established are these capabilities in your institution?

The optional questions that follow relate to the wider regulatory environment in which higher educations in England operate. The DfE has consulted the sector on a number of higher education reforms with a view to improving outcomes, access and value for money of investment in higher education by students and taxpayers.

Thinking of that specific consultation, what are the biggest opportunities these reforms may offer the sector, if any?

Thinking of that specific consultation, what are the biggest challenges these reforms may present to the sector, if any?

# Strive

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We are a specialist higher education consultancy united by our shared values of curiosity, courage, and capacity-building; bringing fresh insights to institutions' most complex strategic challenges. Our focus is to help higher education institutions gain insight, drive improvements and deliver greater autonomy and performance. We bring deep, functional expertise and a holistic perspective to every project. We capture value across boundaries and help you create impact today.

At Strive Higher, we support the higher education sector through consultancy, learning and development, and executive coaching services.

If you are interested in discussing how we can support you and your organisation, please get in touch: [info@strivehigher.co.uk](mailto:info@strivehigher.co.uk)

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A proven senior HE leader, having held executive level roles directing strategy and people transformation programmes and qualified executive coach. Daniel brings a deep understanding of the culture, history and politics of the sector.



**Juliet Szabo-Merridew**  
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Juliet is an organisational development and executive leadership development specialist. She has extensive experience in designing and facilitating executive leadership development and strategic planning events within the HE sector.



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Laura brings a wealth of skills and experience leading university data strategy and governance initiatives. Laura can navigate the most complex and pressing data strategy and governance challenges with confidence and clarity.



**John Melton**  
Strategic Partnerships Portfolio Lead

John leads on the delivery of Strive Higher's strategic partnerships strategy, products and services. He has extensive experience of developing and implementing strategic projects, supporting change programmes and project management.

Special thanks to Ben Hunt.

## References

- [1] [Regulator opens investigations into quality of higher education courses - Office for Students](#)
- [2] [On what grounds will we see 'boots on the ground'? - HEPI](#)
- [3] [A Risk-Based approach – reflection of an institutional experience of the new quality assessment review by the Office for Students - HEPI](#)
- [4] [Higher Education and Research Act 2017 \(legislation.gov.uk\)](#)
- [5] [Having regard to institutional autonomy - Office for Students](#)
- [6] [Conditions of registration - Office for Students. Conditions of registration are the criteria a higher education provider must comply with if they are regulated by the Office for Students. Each has a particular letter and number denoting it e.g. 'B4'.](#)
- [7] [What would it take to shift the dial on data burden? | Wonkhe](#)
- [8] [It has been recently argued that some universities who take the majority of widening participation students should have a 'social mobility' premium. February 2024 | Post-92s need 'social mobility premium', says University of Wolverhampton Vice-Chancellor - University of Wolverhampton \(wlv.ac.uk\). This should be used to create opportunities for students who come from underrepresented communities into higher education.](#)
- [9] [Reducing burden makes for good governance - Office for Students](#)
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- [16] [House of Lords - Must do better: the Office for Students and the looming crisis facing higher education - House of Lords Industry and Regulators Committee \(parliament.uk\)](#)