Calculating student numbers: Consultation on the principles guiding how we will calculate student numbers for regulatory purposes

1. What do you think about how we propose to measure intensity of study?

- What are the benefits of this approach?
- Do you have any concerns about this approach? If so, what and why?

The College is supportive of the proposed approach. It is appropriate to include all registered students in calculating a provider's student numbers.

The College supports use of student FTE data for calculating intensity of study. This is a more appropriate and reliable measure than mode of study. Parity with other methods for measuring student FTE (using the HESA method for STULOAD) is welcome so as not to introduce further burden.

The College does not offer further education provision, and is not offering a view on how FTE should be measured for further education students.

With regards to the TEF, there are concerns around the proposal that "providers that teach in a subcontractual relationship, but do not register students themselves" will not be required to participate in the TEF, and the registering provider will be required to take part in its own right. Given that the TEF has been developed to provide information upon which prospective students can make decisions, this appears unhelpful. We would propose that where a provider does not teach any of its registered students in a particular discipline, and that provision is wholly franchised or subcontracted, it would be more appropriate for the provider delivering the teaching to be assessed in any subject-specific element of the TEF. This would align with the TEF metrics.

2. What do you think about our proposal to include a provider's overseas activity in the student number calculation once reliable data becomes available?

- What are the benefits of this approach?
- Do you have any concerns about this approach? If so, what and why?

The College agrees that students registered with a provider who are studying wholly overseas should not be included in the calculation for as long as reliable data are not available. It would be appropriate to include these students in future once reliable data are available, provided that the approach to this is not unduly burdensome for providers

The sector should be consulted before a measure of overseas activity is introduced. This should cover the method of counting and the definition of overseas activity. Reliable and accurate data collection methods should be incorporated into other data collections in order to not increase the burden for providers.

Further clarity should be given as to whether students studying wholly overseas, and who are not currently counted in determining mandatory TEF participation will in future be counted for this purpose.

3. What do you think about our proposal to include all higher education provision, including provision the OfS will not generally fund, such as provision listed on the Ofqual register of regulated qualifications.

- What are the benefits of this approach?
- Do you have any concerns about this approach? If so, what and why?

It would be appropriate to include all students registered for higher education provision in calculating student numbers, including provision which is regulated but not funded by the Office for Students.

The College supports the approach to TEF participation as set out in paragraphs 36 and 37 of the consultation document. If providers above the size threshold which do not have sufficient data for assessment were given TEF awards, this could raise issues of non-comparability between providers. It is appropriate for providers to receive provisional awards in these circumstances if they choose to enter TEF assessment.

4. What do you think about our proposal to use existing data, where possible, to calculate student numbers?

- What are the benefits of this approach?
- Do you have any concerns about this approach? If so, what and why?

The College strongly supports this proposal. It is appropriate to use existing data for the calculation of student numbers. The proposed data and definitions are already in use and are understood by the sector. A separate or additional data collection process would increase burden for providers, and should be avoided.

5. We have proposed that the same approach to counting student activity should apply across all the regulatory activities mentioned above (i.e. to assess applications for degree awarding powers and university title, to determine mandatory participation in the TEF and to determine what band a provider is in for registration fees). Do you have any concerns about its application to one or more of these activities? If so, which one(s) and why?

In principle, the College supports the same approach to counting student numbers being applied to the assessment of degree awarding powers and university title, determination of mandatory participation in the TEF, and determination of band for registration fees. Taking this consistent approach will reduce burden, and will allow providers to use the existing definitions and data collection methods in their planning processes.

However, the application of the proposed approach to student number calculation may present issues regarding TEF participation. As per our answer to question 3, we support the details set out in paragraphs 36 and 37 of the consultation document. As per our answer to question 1, we would propose that where teaching in a particular subject or subjects is wholly franchised or subcontracted to another provider then that provider should participate in the subject-level TEF. This would align with the TEF metrics.

6. Overall, what do you think about the proposed principles of the new method for calculating student numbers?

- Is there anything you would like to see added? If so, what and why?
- Is there anything you would like to see changed? If so, what and why?