



## OFFICE FOR STUDENTS (OFS) CALCULATING STUDENT NUMBERS: CONSULTATION ON THE PRINCIPLES GUIDING HOW WE WILL CALCULATE STUDENT NUMBERS FOR REGULATORY PURPOSES

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ICAEW welcomes the opportunity to comment on the consultation *Calculating student numbers: Consultation on the principles guiding how we will calculate student numbers for regulatory purposes* published by the Office for Students. Our answers to the consultation questions are provided below.

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## ANSWERS TO SPECIFIC QUESTIONS

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

We support the proposed new method for measuring the intensity of study. The benefit of this approach is that it acknowledges that educational provision can be flexible, catering to the different needs of learners, as we believe that it is the intensity of study and the output that demonstrates the success of the student. This new approach further demonstrates the Government's recognition of the changing nature of higher education in England, as it takes into account the variety of part-time and distance-learning courses as well as the diversity of degrees.

We support the OfS's aim to calculate and gather complete data that demonstrates the full spectrum of higher education students. However we query the proposed method because it may not take into account all qualifications and credits at Level 4 and above. For example, there may be students studying for a qualification that is Level 4 or above from a provider that is neither a higher education institution on the Framework for Higher Education Qualifications, nor on the Teaching Excellence Framework, nor on the Ofqual Register of Regulated Qualifications. We query how the OfS will be sure to include these types students into the data on higher education students.

We further suggest that the output or degrees that are awarded also be counted as this information would provide more complete data on higher education students.

### ***2. What do you think about our proposal to include overseas activity once reliable data becomes available?***

We support the inclusion of overseas students in the calculation for total student numbers, once this data becomes available.

Our assumption is that there are two types of students studying overseas; those that are registered in UK universities who are spending time studying overseas and those that are registered at the international campuses of UK universities or which operate internationally. This raises the question of whether international students registered with a non-UK university, but who are studying for a period in the UK, should be included in the data collection. In the data that is reported and made public, these categories should be clearly defined. This is important because overtime this will provide us with a clear picture of the impact of UK higher education internationally.

Secondly, it would be beneficial to know exactly when the OfS plans to include this data on overseas students. A precise date could perhaps be set out in the consultation on the OfS's Data Strategy due in autumn 2018. Institutions will need an implementation period to embed these metrics into their reporting and data submission processes.

### ***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?***

The data collected and presented by the OfS should provide a clear and comprehensive information on all students and higher education provision regardless of whether these providers can be funded or not.

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

It seems practical to use existing data to calculate student numbers. This would alleviate the administrative burden on universities and HEIs to process and submit data that has already been provided to another regulating body in addition to the OfS. This proposal is also beneficial because it avoids introducing the burden of new metrics and formulas in an area where stakeholders must be rather weary from change. A leading concern at this time, is the plethora of policies and

changes to the sector that educational providers must keep up with. The new Office for Students, the new Teaching Excellence Framework, the new Institute for Apprenticeships, the T-levels, and the new route to Degree Awarding Powers. We should continue to monitor this data and regularly consult HEIs on the most straightforward way to calculate this data.

***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).***

We support a consistent approach to calculating student numbers across the different activities of the OfS whether it is for applications for DAPs or participation in the TEF (that is excluding funding purposes). It is not only a practical and fair approach, but also increases transparency of the data and the decision making of the OfS.

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

We support these proposed principles because they demonstrate the regulatory approach that the OfS is intent on pursuing and has set out in PAR 14 of the Regulatory Framework for Higher Education in England. The regulatory approach is designed to be “principles-based because the higher education sector is complex, and the imposition of a narrow rules-based approach would risk leading to a compliance culture that stifles diversity and innovation and prevents the sector from flourishing”. As such, the methods the OfS implements should also be principles based.