

What does it mean to regulate in the student interest?

Ahead of the Office for Students' (OfS) new strategy, we've held workshops with university leaders and students' union representatives to reflect on what it means to regulate higher education providers in the student interest. We believe there should be ongoing constructive three-way conversations between students, the higher education sector, and the OfS to understand the student interest and the most appropriate approaches to protect it.

Universities, wherever they are in the UK, are subject to regulation across their activities — from research and financial affairs to international compliance and corporate responsibilities. As recipients of public funding, universities accept this regulation as an important way of protecting the public interest.

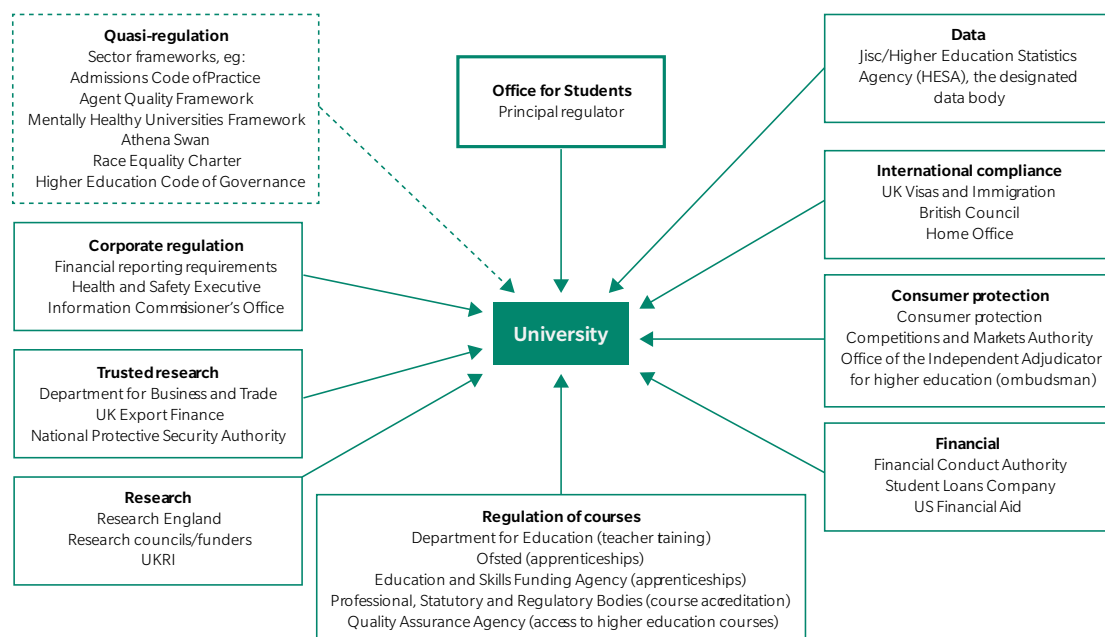


Figure 1: A typical English university and its regulation. [Download plain text version](#)

While this regulation serves a range of purposes, arguably one of the most important is protecting and enhancing students' experience of higher education.

Since its inception in 2018, the Office for Students (OfS), the principal regulator in England, has made this a focus of its work. However, an inquiry by the House of Lords Industry and Regulators Committee in 2023 raised questions about how well the OfS has achieved this.

Sir David Behan's public bodies review of the OfS, published in July 2024, identified regulating in the student interest as one of the four key priorities for the OfS, alongside quality, financial sustainability and protecting public funds. These priorities are reflected in the OfS's consultation on its strategy for 2025–30, published in December 2024. See our response to the OfS Consultation.

As part of an increased focus on student interest in its new strategy, we welcome the OfS's research with students on understanding the student interest. We've also been reflecting on the sector's understanding of the 'student interest' and what this might mean for the OfS's regulation. This thinking builds on the recommendations for regulation in our blueprint, focusing on where regulation can support and enable universities to work with their students to better protect their interests. It also means considering where additional regulation could put work in the student interest at risk by diverting attention or resources.

Our research

Between November 2024 and January 2025, we held a series of workshops on what it means to regulate in the student interest. We explored the topic with senior leaders from over 30 Universities UK (UUK) members, including a broad mix in terms of geography, size, and mission, as well as representatives from student unions from 13 universities. These were chaired by University of Westminster Vice-Chancellor, Professor Peter Bonfield.

The workshops were intended as the start of a conversation about what the student interest is and how this relates to regulation. While views varied across the workshops, this briefing sets out the key themes identified, drawing on national data and research.

There is no single ‘student interest’

One of the biggest reflections from across all workshops was the importance of remembering that ‘the student’ is not a single entity.

Different students have different motivations, needs and priorities for their university experiences. They attend universities and complete courses that vary in mission, specialism and design, chosen to best meet their needs.

To effectively regulate in the student interest, regulation must acknowledge this diversity. It can’t be one-size-fits all.

For example, this includes considering students’ personal characteristics, mode and level of study, and home or international status when assessing a university’s performance on quantitative metrics. What is a ‘good’ student outcome may differ from one student to another, and regulation needs to reflect this, acknowledging the reality that some students face much greater barriers to academic success and progression than others.

Planned future developments of the sector will increase this diversity further, such as the introduction of the lifelong learning entitlement (LLE). The LLE has the potential to fundamentally reform the way higher education courses are designed and to open up the sector to a wider range of students.

Regulating in the student interest must include diversity as a core principle, and a regulator should be able to demonstrate nuance by considering the context of individual student cohorts and individual institutions. It should also adopt a risk-based and proportionate approach that enables universities the space to focus on delivering for their specific student body, without being overloaded with burdensome or prescriptive requirements.

Defining the student interest

This briefing highlights five key themes that emerged from our engagement with university senior leaders and student representatives:

1. quality
2. employability
3. conditions of learning

4. safety and belonging
5. transparency

These are some key areas of student interest that we believe the OfS should remain mindful of throughout its work. However, this does not mean that active regulation is necessary for all the topics discussed in this briefing. Many of the interests outlined are owned by the higher education sector itself, and universities are always working to understand the needs of students and adapt their offering to meet those needs.

To avoid the risks of mission creep and duplication of effort, the OfS should look at reducing its reliance on formal regulatory levers and work with the sector and relevant networks to share good practice in areas which may sit beyond its primary role. This is especially important at a time when sector finances are constrained, as resource spent on regulatory compliance reduce the funding available for student experience.

Quality

Across all our workshops, quality of experience was consistently raised as being in the student interest. The vast majority of higher education courses delivered by universities are of high quality, and universities work hard to ensure this remains the case. For example, 2024's National Student Survey (NSS) found that 85.4% of respondents answered positively to questions about teaching on their course, with 91.1% agreeing that staff are good at explaining things and 80.9% agreeing that teaching staff make the subject engaging.

Participants felt that, at its core, a high-quality experience meant receiving a degree outcome which is robustly assessed against standards that are consistent across the sector and across different student groups. Students need to feel assured that they will be treated fairly, that their degree will hold its value over time and will be recognised across the rest of the world.

When thinking about quality and the student interest, the experience during the course is also vital. Participants in our workshops told us that students want to see relevant, up-to-date curricula that prepares them for their future careers, taught by qualified, competent teachers in interesting and innovative ways. This includes curricula that relates to real-world examples and pressing global issues, such as the climate emergency and developments in artificial intelligence (AI), to help students understand the application of their studies and enhance their employability.

This learning is supported by adequate resources – including course materials and physical spaces such as laboratories and libraries. These student priorities are reflected in Advance HE and the Higher Education Policy Institute’s (HEPI) Student Academic Experience Survey 2024, which surveyed over 10,000 students. When asked whether they received good or very good value, students said the key drivers for their responses were teaching quality (51%), course content (48%) and course facilities/resources (43%).

‘For our students, the entrepreneurship element is really important to them, and being able to envisage the real-world application of what they’re doing. Our research puts that particular focus on solving those real-world problems, but students do also actually really want to see that at a very early stage of their degree.’

There’s also a personal element to the quality aspect of the student interest. Firstly, participants told us how important academic support is. Being able to engage with individuals who support their learning, including during the transition from secondary education to higher education, was seen as vital.

Participants also shared the importance of a consistent personal connection from staff such as personal tutors who engage with students for the duration of their studies. HEPI and Advance HE’s Student Academic Experience Survey found that, in general, students want better-quality and more academic support, most often related to access to academic staff and feedback provisions. Participants from student unions noted the importance of teaching staff engaging with student representatives throughout the programme to understand what’s working for students.

Providing an element of choice and personalisation to suit an individual’s needs was also considered to be in the student interest, as it allows for students to have valuable experiences which are tailored around their interests, aspirations and needs. This includes being provided with a choice of courses, modules and work-based learning opportunities. Of course, it’s for universities to make decisions about their offering to ensure students are provided with adequate choice and personalisation. This can be built into regulation that’s in the interest of students by providing space for a diversity of provision in the sector, in order to serve the needs of the widest possible range of students.

While our members involved in this work are all registered with the OfS and hold degree awarding powers, as discussed in our [blueprint for change](#), providing real choice requires a range of pathways for students. Regulating in the student interest, therefore, means finding a balance between the necessary additional oversight for some newer higher education providers as they establish themselves and avoiding the creation of barriers and disincentives.

‘As somebody going into higher education, I would want and expect the sector to offer sufficient choice of portfolio and of course to suit me as an individual. So, there's something about level of personalisation to fit my interests, my style of learning and my personal circumstances to a course.’

To ensure these student interests are embedded within the regulation of quality, it is important to include students’ voices in the assessment of quality, including sitting on review panels. This is a requirement of the [European Standards and Guidelines \(ESG\)](#), with which England is currently judged to be only ‘partially aligned’ but to which the OfS has committed to revisiting.

Employability

Workshop participants told us that employability is a priority for many students who embark on university-level study. For many, being able to transition from education to employment is a primary concern and one by which they will later judge the value of their degree. Our workshop participants reflected that this is a particular priority for today’s students compared to past cohorts, due to higher fees and increasing living costs. Universities support this through relevant, up-to-date curricula, providing careers advice and provision of work-based learning opportunities such as placements. Senior leaders we spoke to told us their universities wanted to ‘grow the whole individual’ during a student’s studies and help them to be equipped for life afterwards.

'In my university, we call it growing the whole individual: making sure when they finish, they're able to stand on their own, including networking skills, interpersonal skills and digital skills. That includes whether they want to go and own their businesses or work for others or be part of an enterprise moving forward.'

For courses and careers that have oversight by professional, statutory and regulatory bodies (PSRBs), regulation in the student interest needs a co-ordinated approach across course level and the provider level regulation overseen by the OfS. Any student embarking on a course expecting professional accreditation to enable them to pursue their chosen career needs to know that this will be offered.

As well as preparing students for particular career paths, workshop participants told us that it's important for students to develop transferable skills that will support them with whatever path they choose. This includes skills like critical thinking, working with others, understanding diverse perspectives and resilience. As well as helping students develop these skills, universities help them understand and articulate what they have gained from their university experience. The NSS 2024 found that 82.9% of students responded positively when asked if their course has developed the knowledge and skills they think they will need for their future.

Success after graduation looks very different for each student and it's important that this is reflected in regulation to effectively regulate in the student interest. A narrow view of graduate outcomes does not adequately incorporate the student interest, as it fails to reflect the incredibly wide range of things graduates might go on to do.

For example, graduates who go on to work in the creative industries may spend periods of time supplementing their income with other paid work, which, when measured by earnings, does not fully represent the contribution those graduates are making to the economy and to cultural life. Similarly, graduates who decide to stay in their local communities to live and work are making significant contributions to those communities, but when narrowly measured on earnings, this contribution may not be accurately captured compared to graduates who move to big cities for work.

Regulation in the student interest needs to bear in mind the wide range of external factors which affect student outcomes, from individual student efforts, circumstances and socio-economic context, while having a realistic view of what regulation can influence and to what extent.

'It is our responsibility to ensure that our students have the kind of transferable skills that mean they will not only get jobs but be part of a generation that also designs, devises, invents, and creates jobs.'

Conditions of learning

Students' interests around quality and employability cannot be met without the right learning conditions. These conditions allow students to dedicate sufficient time to their learning and take advantage of the many opportunities universities offer, such as:

- Having enough time to support themselves and dedicate to independent study and assessment.
- Having a warm, safe space to study.
- Having enough money to support themselves and engage with the course and wider university experience.
- Having access to the right IT equipment, software, and/or materials, without facing additional costs.

'If you have an environment that isn't warm, where you don't have a place to study, or where you might not have access to digital equipment, that places a lot of stress on you as an individual, which might create some of that need for further support. Thinking through some of those challenges and how we provide that scaffolding in the environment also can support general wellbeing.'

Real-terms cuts in maintenance support have meant that students are increasingly taking on long hours of paid work to cover their living costs. In [HEPI and Advance HE's Student Academic Experience Survey 2024](#), 56% of the students surveyed reported being in paid employment during term time, with those who work spending an average of 14.5 hours in employment per week. This puts conditions required for effective learning at risk.

Many of the factors which affect this are outside of the direct control of the sector and its regulators, such as the cost-of-living crisis and private accommodation costs. For these reasons, in [our submission to the Comprehensive Spending Review 2025](#) we've called on the government to reinstate maintenance grants for students from the most disadvantaged backgrounds. To effectively serve the student interest, these considerable pressures on students should be front of mind for regulators and individual universities. In the same survey, 75% of students reported that concerns or challenges around the cost of living have negatively impacted their studies.

For the sector itself, this means that universities will continue to carefully consider delivery modes and timetabling. The [OfS' insight brief on its findings from quality assessments](#) highlighted the importance of institutions understanding their particular students and tailoring course delivery effectively to meet their needs. Having a well-constructed timetable, made available far in advance, gives students the capacity to balance life and work. Universities are taking a wide range of approaches to this, such as concentrated in-person teaching in longer blocks, evening and weekend teaching, and providing flexibility in teaching formats, such as seminar groups. It may be helpful for the sector to further collate and consider good practice in this area.

For regulators, this aspect of the student interest can be supported by continuing to share learning from investigations and assessments related to condition B2, which is a specific part of the OfS regulatory framework on resources, support and student engagement. As well as this, as the OfS develops its new integrated approach to quality, it should consider how it can incorporate an increased focus on qualitative assessments of on-course experience and enhancement.

Safety and belonging

Regulation that's in the student interest needs to take into account that university students face a range of challenges in today's complex world, including mental health, political instability and environmental crises.

Universities provide effective student support beyond academic support, such as mental health support and careers advice, to ensure that students are well-supported throughout the course of their studies. Senior leaders and student representatives we spoke to told us that this type of support helps students feel they belong and are able to be themselves, including having their individual learning styles considered and being able to learn in a way that works for them. This enables students to reach their full potential. They also told us that initiatives designed to support particular groups of students often benefit all students through inclusive practice.

It's essential that students know how to access the support offered by their universities. The NSS found that 78.6% of respondents agreed that information about their institution's mental wellbeing support services was well communicated. Information about mental health support services, careers services, and other services offered by institutions needs to be clearly and accessibly communicated with students throughout the academic year, including those on placements.

'Having these support systems in place and knowing that there are people in the university community that you can trust and go to, whatever it is you might need, is super important for students.'

A sense of belonging can also be supported by being part of a community. This might mean feeling a sense of cultural safety, participation in extracurricular activities or being part of university initiatives that make a difference to the wider world, such as environmental initiatives.

'An item that's on a lot of students' minds is tackling the complexity of life in our age, including mental health issues, multiple responsibilities, needing to sustain themselves, living in a time of environmental crisis, political crisis, etc. How do you deal with all of that while at the same time as being able to dedicate yourselves to your studies? That is something that comes up quite a lot in conversations with students.'

The OfS will regulate higher education providers on tackling harassment and sexual misconduct from 2025–26, which is an area of high importance to many students. The OfS should consider how it will evaluate the impact of this new regulation on students and providers, and to consider good practice already within the sector.

Transparency

Many workshop participants talked about the importance of students being able to hold institutions to their ‘promise’. This ‘promise’ refers to students knowing what to expect from their course and wider university experience, and ensuring that this experience is in line with those expectations.

These expectations include many of the priorities set out in this briefing, for example:

- Expecting that doing a degree in a certain discipline should prepare students for the appropriate point in their personal journey.
- Expecting access to wider opportunities, such as the wider social environment and extracurricular activities, study abroad opportunities and volunteering opportunities.
- Having confidence that the award students obtain will be relevant for what they want to do after completing their degree.
- Understanding what the course entails and what resources students will have access to (eg university facilities, teaching staff).

Transparency of information is vital to ensuring that students are clear about what to expect from their time at university. This includes universities providing transparent and comparable information for students, such as typical hours of in-person instruction, online instruction and independent study expected on a course, including the factors that may affect this. Transparency about the cost of university also supports the student interest by informing student choice and expectations, for example making information about hidden course costs, accommodation costs and travel costs clear and accessible.

‘There's a role for expectations management and for much better communication about what the learning experience is going to be, because I think it's much easier for people to come into a university and perceive that it's been worth it if they get the experience that they expected.’

Students also need to know what to do when things do go wrong, through the provision of robust, efficient, transparent and fair complaints and appeals systems. They need to be assured that if a dispute, a fair outcome will be reached, with a clear explanation of why a decision has been made.

Conclusions

This work, discussing the student interest with our members and student representatives alike, has illuminated that regulating what is the interest of students means regulating for a diverse community. This requires a multifaceted, multi-organisational approach that appreciates and capitalises on the work of numerous key players. One of these key players is of course the OfS, and we hope this work helps to identify the few core areas where it can have the most impact and more impact than other players when regulating in the student interest.

What was also clear from the workshops was that much of the activity needed to deliver for students is within the power of universities themselves. This can be underpinned by best practice and sector guidance, and continue to evolve to meet the rapidly changing needs and priorities of students.

We are committed to continuing these conversations with the OfS and our members, to support the ongoing relationship reset and the OfS' work to improve its engagement with the sector. Crucially, these workshops have shown the value in ensuring students are also part of the conversation. Regular three-way dialogue between students, universities, and the regulator will be invaluable to securing the effective regulatory environment we need to protect and promote the student interest.

This work has shown that these conversations should focus on five key areas, understanding where regulation can be most usefully deployed and where it is the sector that can and should be leading the way. These are:

1. Quality – fair, consistent assessments, relevant curricula, skilled teachers, academic support, and personalisation to support students' success.
2. Employability – developing relevant and transferable skills which equip students for their future careers.
3. Conditions of learning – conditions that allow students to dedicate sufficient time to their learning and take advantage of the many opportunities universities offer.
4. Safety and belonging – students feeling safe, supported and part of the university community.
5. Transparency – students knowing what to expect from their university experience, and the experience being in line with those expectations.

Future-proof regulation

The themes emerging from these workshops represent how the sector thinks about the student interest. Some of these are likely to apply to students past, present and future, while others reflect the current context in which students are studying.

Informed by the kind of dialogue we have seen here; regulation that's truly in the interest of students needs to anticipate developments in order to remain fit for the future. We are living in a time of significant global change, and regulation must be flexible enough to respond to these challenges. For example, developments in AI are transforming both work and study, and the roll out of the LLE will open up tertiary education to a wider range of learners, leading to significant changes in the sector's offering.

We welcome the OfS' intention to deepen their understanding of students' perspectives, as outlined in their strategy consultation, and their plans to create a student interest board as a formal committee of the OfS board.

Working together

Across all the aspects of the student interest identified through our workshops, it's clear that regulation must allow for flexibility where appropriate, recognising that no one size fits all for students or providers. Going forward, there is an opportunity for the OfS to work with networks and build on existing work in the sector to avoid unnecessary regulatory burden or duplication. This is especially important to ensure effort is focused where it most matters at a time where resources are stretched. These principles will serve the student interest and regulation more broadly.

We've set out our positions on the OfS' wider strategy in our consultation response and remain committed to working constructively with the OfS as it embarks on its new strategy, and engaging with students in this process.

Thank you to everyone who participated in our workshops for your engagement and your insights, which have made an invaluable contribution to this work.