Second OfS consultation on quality and standards
Response from the Chartered Association of Business Schools

27 September 2021
Proposal 1: impose three general ongoing conditions of registration relating to the quality of a provider’s courses

Question 1a: Do you agree or disagree with the proposed introduction of ongoing condition B1 and associated changes to the OfS’s regulatory framework as set out in Annex A?

Chartered ABS response: Agree

Question 1b: Please give the reasons for your answer to Question 1a.

Chartered ABS response: We feel it is important the conditions of registration ensure on an on-going basis that students receive a high-quality academic experience, and in general the proposed changes are suitable for this aim.

Question 1c: Do you have any alternative suggestions to the proposal in Question 1a?

Chartered ABS response: No

Proposal 2: impose one general ongoing condition of registration relating to the standards of a provider’s courses

Question 4a: Do you agree or disagree with the proposed introduction of ongoing condition B5 and associated changes to the OfS’s regulatory framework as set out in Annex B?

Chartered ABS response: Disagree
**Question 4b:** Please give the reasons for your answer to Question 4a.

**Chartered ABS response:** Whilst we recognise the importance of sector-recognised standards we have concerns that the proposed ‘threshold standards’ might stifle providers’ scope for innovation and the creation of new courses in line with evolving topics and themes. Some disciplines change quickly and do not rely on standard sets of knowledge and skills, thus requiring providers to create completely new courses which may not have existing recognition from the sector.

**Question 4c:** Do you have any alternative suggestions to the proposal in Question 4a?

**Chartered ABS response:** No

**Proposal 3: impose two initial conditions of registration, one relating to the quality of, and one relating to the standards applied to, a provider’s course.**

**Question 5a:** Do you agree or disagree with the proposed introduction of initial condition B7 and associated changes to the OfS’s regulatory framework as set out in Annex C?

**Chartered ABS response:** Agree

**Question 5b:** Please give the reasons for your answer to Question 5a.

**Chartered ABS response:** We believe that all new providers seeking registration should be assessed for their ability to comply with the on-going conditions and standards once registered. We concur that it is important that this process is clear and straightforward so that new providers are not unduly deterred from seeking registration.

**Question 5c:** Do you have any alternative suggestions to the proposal in Question 5a?

**Chartered ABS response:** No

**Question 6a:** Do you agree or disagree with the proposed introduction of initial condition B8 and associated changes to the OfS’s regulatory framework as set out in Annex C?

**Chartered ABS response:** Disagree

**Question 6b:** Please give the reasons for your answer to Question 6a.

**Chartered ABS response:** Similar to our response to Question 4a in relation to the proposed on-going condition B5, we have concerns that expectations of compliance with sector recognised standards could lead to providers being hindered in the development of new courses if these are not recognised by existing sector standards.

**Question 6c:** Do you have any alternative suggestions to the proposal in Question 6a?

**Chartered ABS response:** No

**Proposal 4a: commission the designated quality body to provide evidence about compliance with the initial conditions for a provider seeking registration**

**Question 7a:** Do you agree or disagree with the approach to information gathering and assessment proposed in paragraphs 85-90 above and as set out in the proposed guidance for initial conditions B7 and B8 in Annex C?

**Chartered ABS response:** Agree
**Question 7b**: Please give the reasons for your answer to Question 7a.

**Chartered ABS response**: None

**Question 7c**: Do you have any alternative suggestions to the proposal in Question 7a?

**Chartered ABS response**: No

**Proposal 4b**: operate a flexible risk-based approach to evidence gathering and investigation for registered providers

**Question 8a**: Do you agree or disagree with the approach to information gathering as part of an investigation proposed in paragraphs 91-98 above and as set out in the proposed guidance for conditions B1, B2, B4 and B5 in Annexes A and B?

**Chartered ABS response**: Agree

**Question 8b**: Please give the reasons for your answer to Question 8a.

**Chartered ABS response**: We are in favour of the proposed targeted approach to addressing non-compliance with minimum standards as we believe these should be focused on the issues that pose the greatest risk to students and that high-quality providers should not face undue regulatory burden.

**Question 8c**: Do you have any alternative suggestions to the proposal in Question 8a?

**Chartered ABS response**: No

**Proposal 4c**: take account of a provider’s compliance history in relation to the quality and standards conditions for the purpose of determining eligibility for other benefits of OfS registration

**Question 9a**: Do you agree or disagree with the approach to taking account of a provider’s compliance history for the purpose of determining eligibility for other benefits of OfS registration proposed in paragraphs 103-126 above and as set out in the proposed guidance for conditions B1, B2, B4 and B5 in Annexes A and B?

**Chartered ABS response**: Agree

**Question 9b**: Please give the reasons for your answer to Question 9a.

**Chartered ABS response**: We agree that safeguarding the reputation of UK Higher Education both domestically and abroad means that it is essential that a provider’s compliance history with quality and standards is considered when determining eligibility for degree awarding powers, university title and OfS grant funding.

**Question 9c**: Do you have any alternative suggestions to the proposal in Question 9a?

**Chartered ABS response**: No

**Proposal 5**: the OfS will use its role as the body responsible for External Quality Assurance for integrated higher and degree apprenticeships to inform its judgements about condition B4.

**Question 10a**: Do you agree or disagree that the OfS should use its role as EQA provider to inform assessments of condition B4?

**Chartered ABS response**: Agree
Question 10b: Please give the reasons for your answer to Question 10a.

Chartered ABS response: None

Question 10c: Do you have any alternative suggestions to the proposal in Question 10a?

Chartered ABS response: No

Proposed implementation

Question 11: Do you have any comments about the proposed implementation of the proposals in this consultation?

Chartered ABS response: No

Question 12: Do you have any comments about any unintended consequences of these proposals, for example for particular types of provider or for any particular types of student?

Chartered ABS response: No

Question 13: Do you have any comments about the potential impact of these proposals on individuals on the basis of their protected characteristics?

Chartered ABS response: No

Question 14: Do you have any other comments about the proposals?

Chartered ABS response: No
About the Chartered ABS

The Chartered ABS is the voice of the UK’s business and management education sector and our members consist of 121 business schools and higher education providers across the UK, as well as affiliate stakeholders, corporate members and international partners.

The UK’s business and management education sector produces vital research for example how best to disseminate new technologies to SMEs; the impact of the current crisis on front line workers; calculating the trade-off between short and long-term benefits in policy-making; informing policy to tackle corruption in professional sports; transforming palliative and end-of-life care for service users; cutting carbon footprints in the service sector.

Business and Management represents 1 in 5 university students and contributes £3.25bn to the UK economy. Its management students go on to lead global businesses and its entrepreneurs contribute to our dynamic economy. Its research has an impact across society and helps to turn our capacity for invention into viable businesses.

While MBAs may enjoy the highest profile of all business school programmes, they make up a very small proportion of what business schools do. In terms of student numbers, MBAs make up less than 5% of the over 325,000 students studying in business schools in the UK, and this doesn’t take in to account short programmes, often offered under the umbrella of Executive Education, which caters for an increasing number of open and bespoke programmes delivered to employees in both large and small firms.