

13th December 2024



Temporary changes to registration and other applications

Dear Susan,

I am writing to express our concerns about the OfS announcement to pause DAPs, University Title and OfS registration application processes.

Response to the announcement

We appreciate the OfS responding to the current funding pressures in the sector by prioritising its energies to identify emerging risks and mitigate the worst ones, such as unanticipated institutional closures that may impact both students and local communities.

Taken together, these processes are the gateway through which our institutions evolve their business models and reshape their identities and offers. While we understand some pragmatism is needed, this decision represents a further challenge to institutions that are working tirelessly to consider how to mould themselves into increasingly tight notions of what a fit-for-purpose institution looks like in the 21st century.

Effect on GuildHE institutions

OfS's recent financial sustainability update indicates that "medium and smaller providers, or specialist providers...are more likely to be affected by financial challenges in the years ahead." Counter-intuitively, the OfS decision to pause these processes escalates material risks to those types of providers and may imply they are valued less than larger universities. Our members are predominantly financially strong, despite the environmental challenges, and positioned to work with the new Labour government as key enablers of its mission to drive economic growth and expand opportunity, while also seeking a firmer financial settlement to ensure the conditions for higher education institutions to thrive are reinforced.

GuildHE members are primarily, though not entirely, affected by the pause in degree awarding powers applications. While OfS initially identified approximately 6 GuildHE member institutions affected by its decision, we have gathered intelligence that demonstrates the impacts are much more widely felt. This includes institutions in the final stages of preparing TDAPs and RDAPs applications to submit to OfS before the end of this year. Not only will many who were applying for DAPs now need to re-negotiate validation fees (some of which have been significantly inflated recently), but also the pause in registration will halt institutional efforts to re-imagine their business through activities such as mergers and changes to corporate form.

Many of our member institutions considering these options are long-established HE institutions, not brand-new entrants to the sector, with cohorts of students whose ongoing high-quality educational experience and long-term degree currency depends on the viability of their institution. Furthermore, restricting RDAP applications will have a long-term negative effect on established providers with a

good track record of delivering research programmes. Given the timing of the next REF exercise, this pause means that many institutions will be unable to progress RDAP applications until after the next REF exercise (i.e. until 2029 or later) due to the resources required for REF submissions. Since some funders set RDAPs as a funding eligibility requirement, these delays will negatively affect institutions' ability to bid for research funding.

While OfS colleagues "recognise that these temporary changes come at a cost," we are not confident the scale or impacts of those costs are genuinely understood. To ensure OfS is sighted on how its decision impacts smaller universities, colleges, and specialist HE academies and institutes, we have provided an annex to this letter (Annex A) containing a selection of specific GuildHE examples of the impacts of this decision.

Next steps

Given our members' experience of OfS application processes, we welcome OfS's dedication to improving its application and regulatory processes during this pause. GuildHE is ready and willing to contribute directly to your efforts to reform them and welcome both informal and formal engagement opportunities regularly throughout 2025 and beyond.

Ultimately, we ask that you reconsider your decision, commit to working with us to support those affected institutions, and provide clarity in early 2025 on the next steps for improving systems and resuming application processes from August 2025.

Yours sincerely,



Dr Brooke Storer-Church
CEO, GuildHE