HEPI

Partnered with
UNIVERSITY OF WOLVERHAMPTON

Policy Note 78 | November 2026

Partnership Accountability and Institutional Resilience: The University of Wolverhampton approach

Dr David G Atkinson, Director of Educational Partnerships

Foreword

Professor Ebrahim Adia, Vice-Chancellor and CEO of the University of Wolverhampton, and Angela Spence, Chair of the Board of Governors, University of Wolverhampton

Building on Vicki Stott's insightful HEPI Policy Note, *A partnership accountability framework for a more resilient higher education sector*, and in the context of the UK Government's 2026 *International Education Strategy*, we are pleased to contribute to the debate about the future of UK subcontracting and transnational education (TNE) partnerships.[1]

At the University of Wolverhampton, our Board of Governors took the decision over two years ago to support and expand both UK subcontracting (often referred to as 'franchising') and TNE partnerships.

This was not simply a commercial decision. It was, first and foremost, a decision rooted in our mission: Creating Opportunity and Transforming Futures. We see partnerships as an important means of extending the reach of higher education into communities, nationally and internationally, where opportunities to participate have historically been limited.

The University of Wolverhampton's strapline is not simply a marketing proposition. It reflects who we are and what we seek to achieve. Our commitment to widening opportunity is reflected in our ranking (third) in the *2025 English Social Mobility Index*, compiled by London South Bank University and published by HEPI. Our ambitions are therefore not simply to create access to higher education, but to create the conditions in which students from all backgrounds can succeed, graduate and transform their futures.[2]

We are also very clear that UK subcontracting brings heightened risks. These include the integrity of student finance, admissions and English language capability and academic quality and student outcomes. High-profile failures identified by the Office for Students have understandably caused some institutions to avoid UK subcontracting altogether, while others have withdrawn from the activity.

Wolverhampton's Board took a different view. We concluded that these risks are real, but can be identified, mitigated and managed through the right combination of investment, due diligence, oversight, accountability and governance. This is the approach we have sought to adopt.

This Policy Note therefore shares our experience of using partnerships to extend higher education into communities that have traditionally had lower levels of participation, while recognising that such an approach carries responsibilities that cannot be delegated to a delivery partner.

The case for widening participation has a long history. For decades, extending access to higher education was met with scepticism, including arguments that widening participation would inevitably mean lowering academic standards. Experience has demonstrated otherwise. University education has transformed millions of lives, including our own. But widening participation requires more than opening the door. It

requires institutions to understand and respond to the needs of individual students. It requires inclusive pedagogy, effective academic practice, personalised skills development and tailored pastoral and student support.

Modern universities have developed much of this expertise over the past three decades, often through considerable adaptation, learning and, at times, unacceptably high levels of attrition. The sector has learned what works by investing, evaluating and improving.

Extending opportunity through subcontracting partnerships will require the same commitment to learning and adaptation as providing provision on our own campuses. Many students entering higher education through these routes have enormous potential to benefit and succeed when provided with the right academic and student support.

There will inevitably be challenges and, as with all forms of higher education provision, there will be instances where things do not work as intended. The critical question is whether we can create a sector-owned framework that is sufficiently rigorous to protect students and maintain standards, while also allowing responsible providers the opportunity to learn, improve and demonstrate that partnership can expand opportunity without compromising quality.

That is the balance this debate requires: neither complacency about risk nor retreat from opportunity, but ambitious widening participation underpinned by strong accountability, investment and governance.

This is the challenge to which this report seeks to contribute.

1. Introduction

Franchised higher education sits at the intersection of two longstanding policy objectives: widening participation and opening up provision to a more diverse range of institutions.

Franchising is an arrangement in which students register with a lead provider – responsible for the provision of their higher education – while a delivery partner teaches the programme on its behalf. By contrast, under a validation arrangement, an awarding institution approves a programme delivered by another provider, enabling that provider to offer a qualification awarded by the validating institution. The arrangements differ in the allocation of responsibilities, the student–provider relationship, contractual obligations and funding flows.

This paper focuses on franchising in England, drawing on a governance framework that also has relevance to transnational education (TNE). While the regulatory and operational contexts differ, the underlying governance challenge is similar: ensuring effective oversight of academic standards, educational quality, the student experience and outcomes across organisational boundaries. Crucially, responsibility for these matters cannot simply be delegated to a delivery partner. Regulatory requirements and accountability arrangements vary across the UK and internationally.

Franchising predates the recent market reforms; no single legislative Act created it or first permitted for-profit higher education. Its expansion nevertheless needs to be understood within the legislative and funding environment. Section 22 of the Teaching and Higher Education Act (1998) provides the statutory basis for student-support regulations, including course designation. The Education (Student Support) Regulations (2011) became a central instrument governing access to publicly supported loans. The 2011 White Paper, *Students at the Heart of the System*, sought greater choice and competition, including easier market entry for alternative providers. From 2012/13, the maximum tuition-fee loan for eligible full-time courses at alternative providers increased from £3,375 to £6,000. These changes made publicly financed participation more accessible beyond established universities.[3]

The Higher Education and Research Act (2017), known as HERA, subsequently established the Office for Students, a Register of English higher education providers and revised routes to degree-awarding powers. The framework accommodated different organisational forms, including commercial providers. Franchising offered a route for institutions without their own degree-awarding powers to deliver university courses, with students registered at the lead institution. Official documents have explicitly linked HERA and other regulatory changes to subsequent expansion.[4] This history does not make commercial provision inherently problematic, but it explains why oversight of delegated delivery became an important public-policy concern.

The scale of growth is substantial. Figures reported by the Department for Education (DfE) show that franchised student numbers rose from 50,430 in 2018/19 to 135,850 in 2022/23 – an increase of approximately 169% over four years. The DfE also reported that franchised students accounted for 5.7% of the higher education student population in 2022/23, with 62% studying Business and Management. These figures describe historical participation rather than a forecast or a current headcount.[5]

The National Audit Office's January 2024 investigation into student finance for study at franchised higher education providers identified weaknesses in governance, regulatory oversight and controls over public funding. In 2022/23, franchised provision accounted for 53% by value of the £4.1 million in fraud detected by the Student Loans Company (SLC), although students at franchised providers represented only 6.5% of SLC-funded students. Separately, investigations initiated in 2022 led the SLC to identify and challenge 3,563 suspicious applications associated with £59.8 million in student funding. The NAO also highlighted weaknesses in recruitment and attendance controls and reported that 65% of franchised providers were not registered with the Office for Students in 2021/22. These findings pointed to systemic weaknesses in the oversight framework alongside instances of potential fraud and abuse.[6]

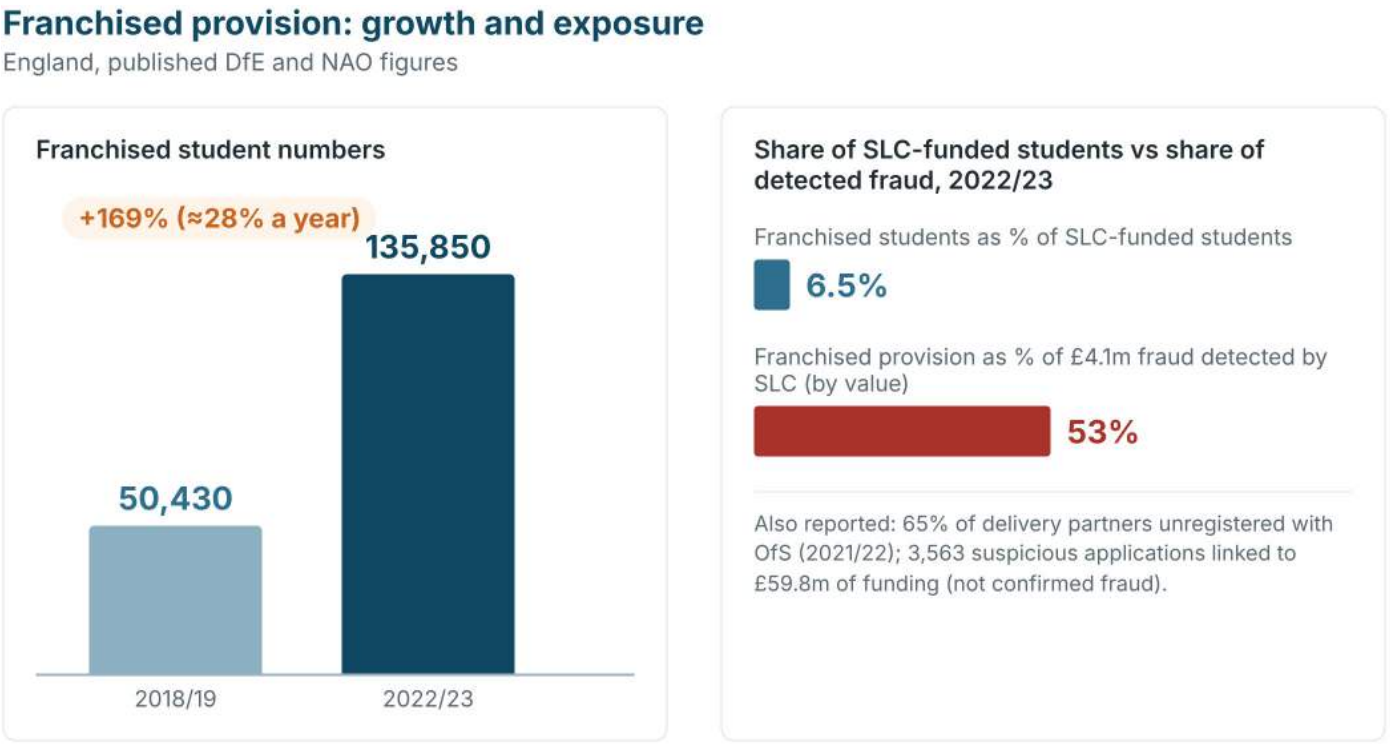


Figure 1: *Growth in franchised provision and its share of detected student-finance fraud. Sources: DfE (HCWS1141, 2025); NAO (HC 387, 2024) (AI generated)*

Policy has since moved towards stronger oversight. The Office for Students' Condition E10 requires lead providers within its scope to identify and address risks to students and taxpayers, and to maintain a single source of information setting out how they manage their subcontracting partnerships. It generally applies where a lead provider has, or expects to have, at least 100 students across the subcontracted courses covered by the condition, subject to specified exclusions.[7]

Separately, changes to student finance regulations introduced in 2026 mean that, from 2028/29, delivery partners with 300 or more franchised students must be registered with the Office for Students for their courses to remain eligible for public student finance for new students, unless an exemption applies. Existing students' funding eligibility is protected. Delivery-partner registration and lead-provider accountability are complementary safeguards.[8]

The HEPI Policy Note *A Partnership Accountability Framework for a More Resilient Higher Education Sector* argued for a practical, sector-owned accountability framework.[9] Wolverhampton's experience offers one contribution: an integrated lifecycle connecting approval, specialist responsibility, assured data, intervention and student protection. The proposals later in this paper build on the emerging regulatory framework; they do not assume that regulation alone can establish effective institutional practice.

The University of Wolverhampton's experience is that effective partnership governance requires an integrated institutional system connecting:

- strategic decisions;
- due diligence;
- financial assessment;
- academic approval;
- operational management; and
- monitoring and intervention.

Our Partnership Control, Compliance and Assurance Framework is designed to provide that system.

The model brings together governance, risk management, compliance monitoring and institutional oversight across the full partnership lifecycle. It is designed to provide assurance to the Board of Governors and the Audit & Risk Committee that educational partnerships operate within the University's regulatory obligations, strategic objectives and risk appetite.

The model is deliberately based around four questions:

- How and should we approve a prospective partner?
- How do we bring an approved partner on board?
- How do we monitor the performance of a partner?
- How do we intervene with a partner?

These questions organise the Framework and connect each partnership decision to the evidence, ownership and intervention capability needed to manage risk.

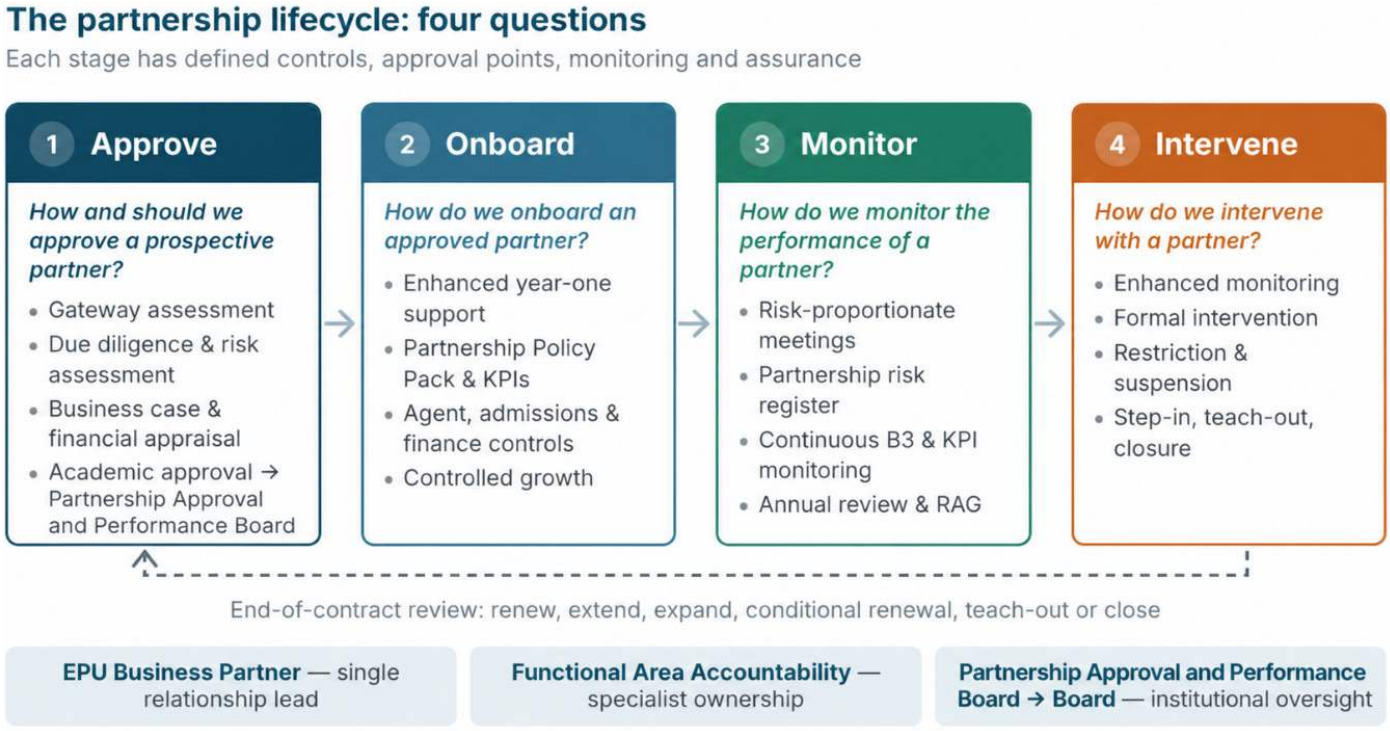


Figure 2: *The four-stage partnership lifecycle within the Partnership Control, Compliance and Assurance Framework (AI generated)*

2. The Educational Partnership Unit

A central feature of the University's Partnership Framework is the Educational Partnership Unit (EPU), which is a dedicated resource to manage the full partnership lifecycle.

The EPU sits at the centre of a matrix, liaising with each partner and coordinating the work of different university functions to deliver a streamlined experience. At the heart of the EPU is the Business Partner

responsible for leading and managing the relationship with a partner. The Business Partner coordinates engagement between the University and the partner, maintains oversight of risks, escalates attention and coordinates institutional responses where concerns arise.

However, the EPU does not replace specialist accountability. The University's Functional Area Accountability Model means that each service area (Finance, Legal Services, Academic Registry, Admissions, Academic Quality, Student Services, Information Security and Digital Services, Marketing and the Academic Schools) retains responsibility for matters within their area of expertise at the partner. In short, accountability is distributed to specialists in the University, but coordination is centralised.

This avoids two common weaknesses in partnership governance: concentrating all responsibility within a single partnership team or allowing responsibility to become fragmented across multiple functions without effective coordination.

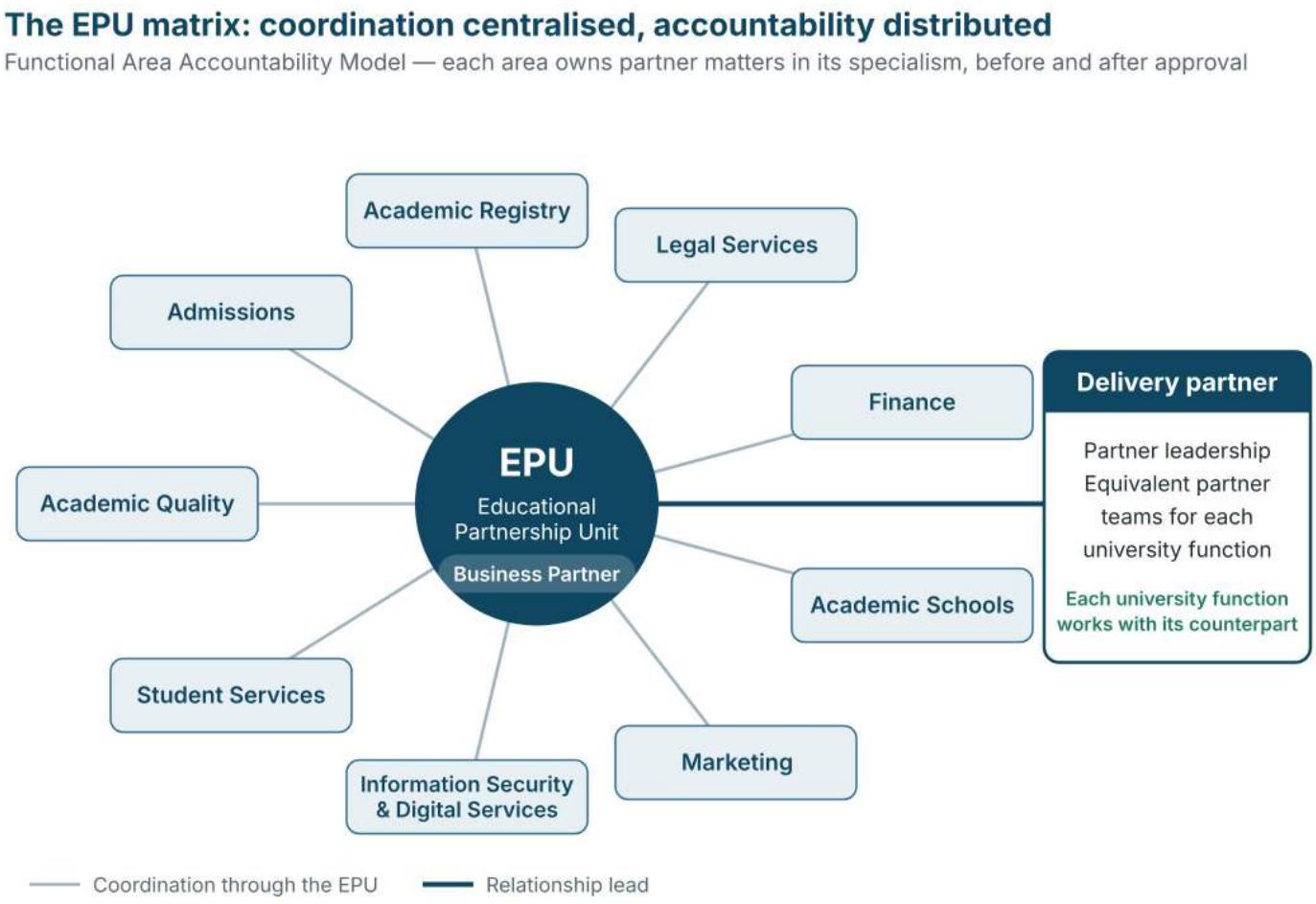


Figure 3: *The Educational Partnership Unit at the centre of the Functional Area Accountability Model (AI generated)*

3. The University Partnership Governance Framework

The University's Partnership Framework is structured around four stages of the partnership lifecycle. Each stage has defined controls, approval points, monitoring arrangements and assurance mechanisms.

Approving a Prospective Partner

Gateway Assessment

The first stage determines whether a prospective partnership should progress to formal due diligence and risk assessment. The gateway considers:

- strategic alignment;
- student outcomes and regulatory performance;

- leadership and institutional capability;
- estate and infrastructure;
- financial and commercial viability;
- reputation; and
- regulatory or geopolitical considerations.

Only opportunities that meet the University's gateway requirements progress to the next stage. This is a substantive test: in a recent assessment of 11 prospective UK partnerships, the University approved one and rejected 10 – a rejection rate of approximately 90%. The gateway examines the proposed delivery model as well as the prospective partner. Teaching patterns, mode of attendance and student finance eligibility are considered at the expression of interest and business case stages. This provides an early opportunity to identify and prevent arrangements that could create regulatory or Student Loans Company risks, including inappropriate delivery patterns.

The initial assessment also considers the proposed campus and institutional capability. This provides an opportunity to identify at an early stage whether the partner's estate, leadership, infrastructure and learning environment can support provision to the University's required standard.

The purpose is therefore to ensure the prospective partner is strategically appropriate and capable of operating within the University's requirements.

Due diligence, risk assessment and approval

Where an opportunity passes the gateway, the University then undertakes full due diligence, risk assessment, financial appraisal and academic approval through three workstreams: institutional risk assessment; financial appraisal; and quality assessment.

Partners are required to provide a comprehensive Institutional Approval Evidence Portfolio covering governance, ownership, financial sustainability, regulatory compliance, higher education experience, recruitment and agents, academic and learning resources, digital infrastructure, student protection and support and operational resilience.

The evidence is assessed through the Functional Area Accountability Model, with relevant professional, academic and specialist teams undertaking formal assessment within their areas of institutional responsibility. A structured risk framework is applied across regulatory, academic, operational, commercial and reputational risks. The distinction between risk definers and risk assessors establishes consistent institutional risk thresholds while ensuring assessments are independently and consistently applied. Identified risks must be addressed through appropriate mitigations, which may become formal approval conditions and, where appropriate, contractual obligations.

Alongside this, the EPU undertakes a holistic partnership review and develops a separate business case and financial appraisal, testing strategic alignment, resource requirements, costs, income, contribution and long-term viability. This ensures partnerships are not only acceptable from a risk perspective but are financially sustainable and capable of recovering the full institutional costs of delivery and oversight.

Academic approval remains distinct from commercial or partnership approval. Partner teaching staff require University approval through Faculty review, while minimum learning-resource standards are supported through the University's contractual framework and access to its digital resources. Prospective partner campuses are subject to due diligence and comparability assessments, including teaching and study spaces, library provision, IT, student services and health and safety.

The combined evidence, risk assessment, business case and academic recommendation form the approval package considered by the Partnership Approval and Performance Board (PAPB). Chaired by a member of the University's Senior Executive Team, PAPB brings together senior leaders and directors of key functional areas, including Legal Services, Registry and Quality and Standards. This enables proposals to be scrutinised collectively from legal, regulatory, operational and academic perspectives. No partner proceeds to onboarding, recruitment or delivery until the required assurances have been secured.

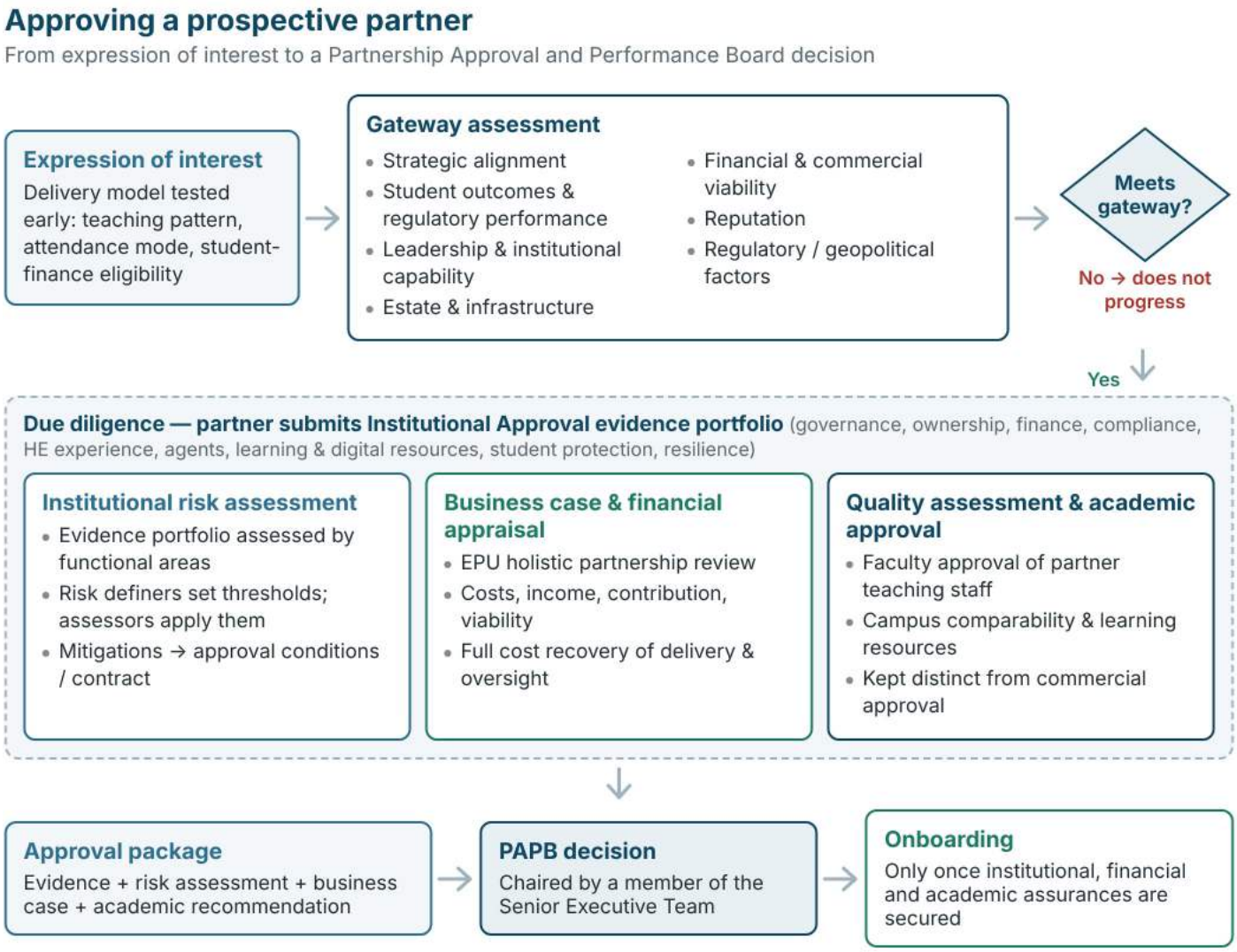


Figure 4: *Approval process: gateway assessment, three due-diligence workstreams and PAPB decision (AI generated)*

Onboarding an approved partner

Approval is not the end of the University's assurance process. Onboarding translates approval conditions into operational requirements and ensures that partners have the capability, systems and controls required before recruitment and delivery commence.

Enhanced year one support

During the first year, the University provides enhanced support through its Functional Area Accountability Model. Functional areas work directly with their equivalent Partner teams to provide training, guidance and implementation support. This ensures that University requirements are understood and embedded at an operational level, while maintaining clear accountability between the University and the partner.

Partnership policy pack

Partners are contractually required to comply with a Partnership Policy Pack, which translates University requirements into defined responsibilities, operational standards and measurable performance expectations. For example, the partner admissions policy specifies responsibilities for verifying applicant evidence, submitting complete applications within agreed deadlines, maintaining accurate records and escalating non-standard cases to the University. It sets minimum KPI targets of 95% for application completeness and on-time submission and 98% for document compliance. Performance is reviewed for each intake, supported by file sampling and compliance monitoring. Persistent failures can lead to enhanced oversight, suspension of recruitment or termination under the partnership agreement.

The attendance and engagement policy extends this approach to students' ongoing participation. KPIs here include at least 98% accuracy in sampled attendance records, fully documented interventions in at least 95% of sampled cases and a complete evidence trail for every withdrawal for non-engagement. Together, these arrangements provide a basis for testing compliance through records and audit evidence and for holding partners accountable where standards are not met.

Recruitment agent controls

From the 2026/27 academic year, the University's new contractual provisions supporting compliance with Condition E10 require partners to disclose all recruitment agents they use. This information will form a central Partner Agent Register, linking recruitment sources to student records and, as students progress through their studies, to their outcomes. Analysis will inform assessments of agent performance and identify concerns requiring investigation or corrective action. The contractual framework provides powers to restrict, suspend or terminate non-compliant agent activity. As these arrangements are newly introduced, it is too early to report an established record of their use or impact.

Financial protection

Partnership contracts include a minimum annual income guarantee: the partner commits to paying the University an agreed minimum amount each year, even if recruitment falls below expectations. Where the fees otherwise payable to the University fall below that amount, the partner must make up the shortfall. This reduces the University's exposure to recruitment volatility and helps cover the institutional costs of supporting and overseeing the partnership.

Controlled growth

New partners initially operate with one course, one site and one intake, with a maximum of 200 students. Expansion requires an explicit University decision based on demonstrated performance, rather than recruitment demand alone. For 2026/27, the continuation threshold for growth is 85.3%, reflecting the continuation KPI set in the University's strategy. Continuation, completion and progression requirements are incorporated into partnership contracts and reviewed through performance management. These institutional requirements are distinct from the Office for Students' regulatory thresholds: meeting a regulatory minimum does not create an entitlement to expand. The University's ambition is for partnership students to achieve outcomes at least comparable with those taught directly, supported by improvement requirements where performance falls short.

B3 performance management

Partnership contracts incorporate performance requirements covering continuation (whether students continue their studies), completion (whether they complete their qualification) and progression (whether graduates move into professional employment or further study). These are the student outcome measures addressed by the Office for Students' Condition B3. Performance against agreed institutional KPIs is monitored throughout the partnership lifecycle and informs decisions on growth, enhanced monitoring and intervention. This helps ensure that partnership activity delivers strong outcomes for students and does not adversely affect the University's overall student outcomes.

University-led PFF assessment

The University is introducing University-led Prepare for Foundation (PFF) Assessment Days across partner locations. These assess readiness to enter a Foundation Year leading into an undergraduate degree. They include physical attendance, identity and proof-of-address checks, written assessment and structured assessment of capability, motivation, communication and engagement.

University staff lead the process and retain the evidence within the admissions audit trail. During the September 2026 pilot, the Duolingo English Test was used as a shadow assessment, while PFF remained the assessment used to determine offers. From January 2027, the planned English-language offer condition for Foundation Year entry is B1 on the Common European Framework of Reference for Languages (CEFR). This describes an intermediate level of English, including understanding the main points of clear communication on familiar topics and producing simple connected text. The threshold draws on the Home Office's B1 benchmark for below-degree study, including courses at Level 3, while remaining a University admissions requirement assessed alongside broader academic readiness. Applicants with verified GCSE English at grade C/4 – or an accepted equivalent – are exempt from the University's additional English-language test requirement.[10]

Student support and protection

Support services that enable students to participate and succeed – including disability support, reasonable adjustments and specialist learning support – are treated as a University responsibility within partnership arrangements.

Partnership students can disclose their support needs directly through University systems, without relying on a partner referral. Partners must also promptly refer students with actual or potential support needs to the University. These complementary routes reduce reliance on partners to identify and report needs, particularly where partners bear the associated costs.

The University retains responsibility for assessing needs, determining appropriate provision and arranging and overseeing its delivery. Provision can include diagnostic assessments, specialist mentoring, assistive technology, accessible learning materials and hardship or emergency financial assistance. This is distinct from statutory student finance, such as maintenance loans.

The aim is for partnership students to access support on an equivalent basis to students taught directly by the University. Partners must provide the facilities, information and cooperation needed for delivery and bear the associated costs, including costs not met by Disabled Students' Allowance or other external funding. These responsibilities apply whether needs are disclosed directly by students or identified through a partner referral. Failure to refer students, facilitate provision or meet these costs constitutes a material contractual breach and can trigger recruitment restrictions or suspension.

University assured data and dashboards

The University holds and monitors partnership performance data centrally across the portfolio. Partners access dashboards drawn from University systems, providing a common basis for reviewing B3 outcomes, recruitment and other KPIs. The EPU and accountable University functions can interrogate performance at partner level and identify portfolio-wide trends. Central access supports verification and challenge; it does not remove the need to audit the accuracy of attendance and other source data.

Together these controls ensure that onboarding is not simply an administrative process but establishes the capability, accountability, financial protection, student support, admissions controls and performance conditions required for a safe and sustainable partnership.

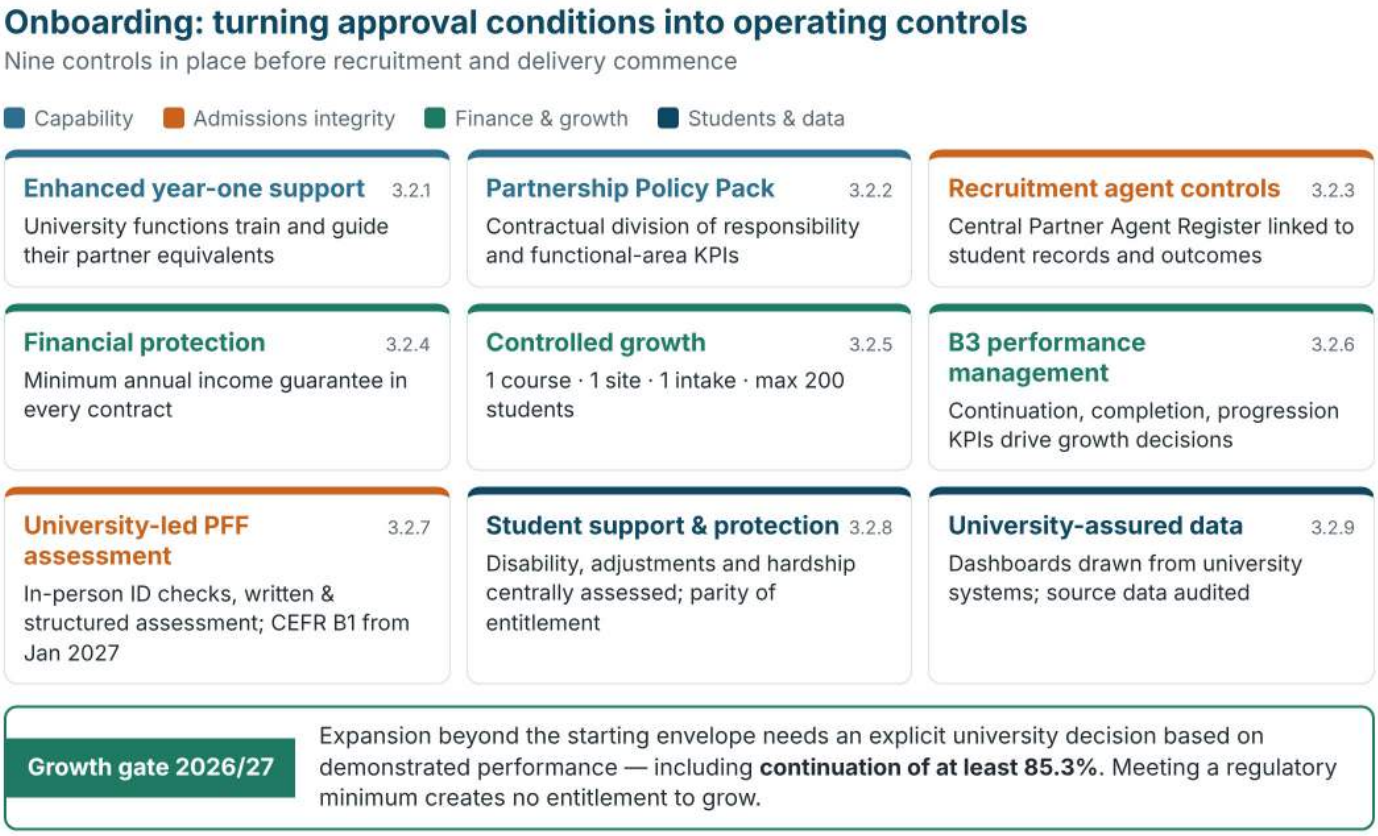


Figure 5: *Onboarding controls applied before recruitment and delivery commence (AI generated)*

Monitoring partner performance

Once a partnership is approved and operational, the governance model shifts to active performance management.

An EPU Business Partner acts as the University's account manager and primary relationship lead, while specialist accountability remains with the relevant University functional areas. This is supported by partner management meetings, partnership risk registers, continuous performance monitoring, annual reviews and traffic-light assessments (red / amber / green, also known as a RAG status). This approach provides continuous oversight rather than treating approval as the end of the governance process.

Partner management meetings operate proportionately to risk: high-risk partnerships are reviewed monthly, medium-risk partnerships every two months and low-risk partnerships quarterly. Meetings consider performance, compliance, student outcomes, academic quality, operational delivery, contractual requirements, regulatory developments, emerging risks and agreed actions.

The individual Partnership Risk Register provides a single auditable record of risks, owners, mitigations, controls, progress and interventions. Continuous monitoring includes recruitment and admissions, attendance and engagement, continuation, completion and progression, graduate outcomes, academic quality, regulatory and contractual compliance, financial performance, complaints and appeals, student support and delivery against approval conditions.

The strengthened mitigations set as part of continuous monitoring become operational controls within this stage. Attendance and engagement are monitored through University-led processes, with University-led Registry audits testing the accuracy of partner attendance data. Partner students are included in University module and end-of-semester surveys, while partners provide biannual assurance reporting covering areas including Virtual Learning Environment (VLE) audits, teaching observations, continuous monitoring and improvement, marking and moderation and student feedback.

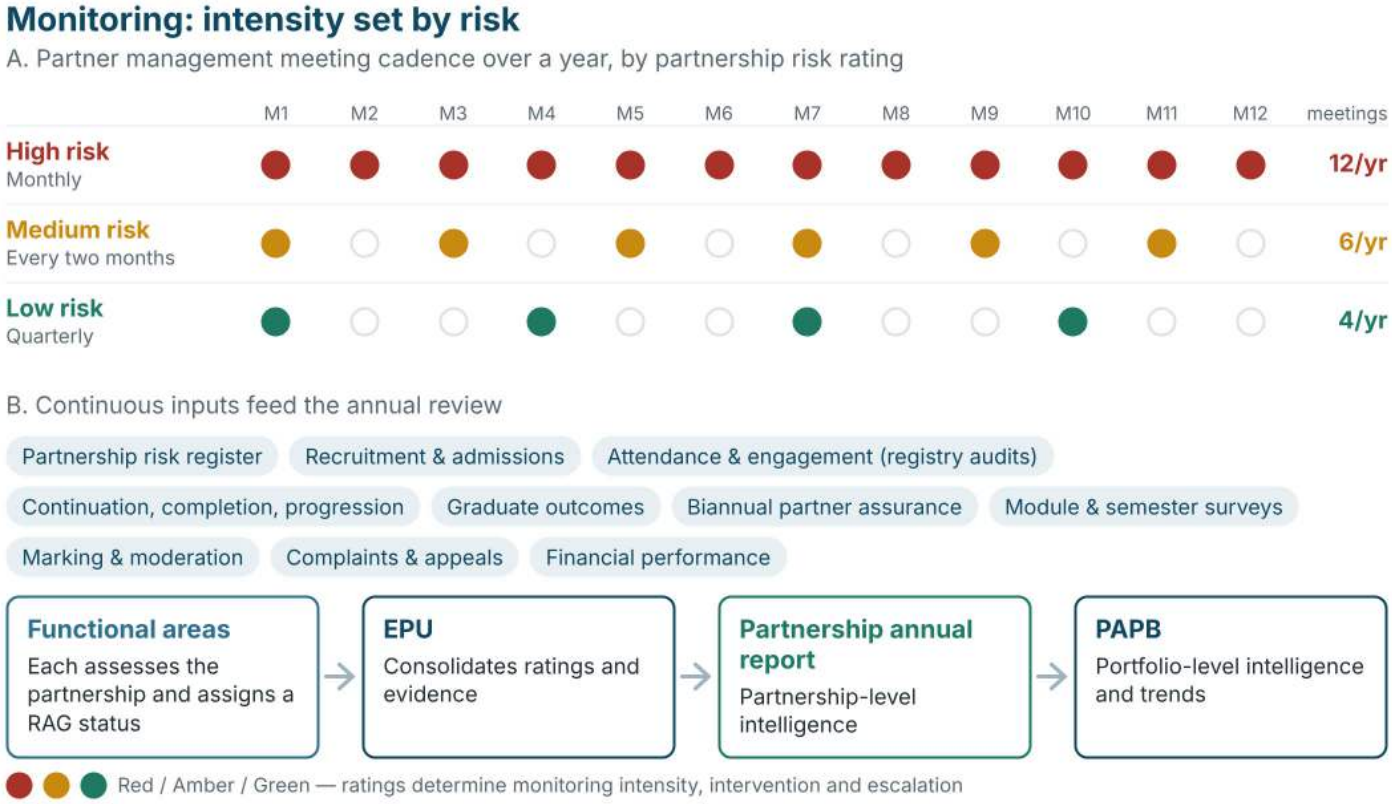


Figure 6: *Risk-proportionate monitoring and the annual review cycle (AI generated)*

Academic integrity is managed as an ongoing performance issue as well as an admissions concern. Teaching, learning and assessment operate through the University's VLE environment, including compulsory plagiarism detection. University module leadership provides scrutiny of Partner marking and moderation. Partner teaching staff must complete mandatory University training and receive approval to teach. This

training includes specific requirements relating to artificial intelligence and academic misconduct, ensuring that partner staff are equipped to identify, prevent and respond to emerging risks to academic integrity.

The University also undertakes an annual partnership review. Each relevant functional area assesses the partnership and assigns a RAG status, which is consolidated by the EPU into a Partnership Annual Report. The resulting model provides both partnership and portfolio-level intelligence.

The approach therefore represents a shift from periodic compliance checking to continuous partnership management. Risk information is not simply collected; it is used to determine monitoring intensity, intervention and escalation.

Intervention and partnership closure

The final stage of the University's partnership lifecycle is concerned with intervention, escalation and partnership closure.

The Framework is based on early identification, proportionate intervention and formal escalation where risks are not effectively mitigated. The intervention principles include student protection, regulatory compliance, evidence-based decision-making, clear accountability, timely escalation and maintenance of institutional control.

The first response is enhanced monitoring, including increased meetings, additional reporting, formal improvement plans and increased functional oversight. Where concerns become material, formal intervention is initiated. This can include mandatory corrective actions, named accountable leads, executive-level review, additional approval conditions and independent review or audit.

Where necessary, escalation can progress to recruitment restrictions, student number caps, programme or campus restrictions, suspension of recruitment or delivery, and ultimately partnership closure.

Delivery failure is wider than contractual underperformance. A partner may become insolvent, lose access to suitable premises, lose a necessary licence or regulatory permission, withdraw voluntarily or be directed to cease provision. In each case, students may lose access to teaching, assessment or support even though they remain registered with the University. The strengthened Contractual Framework therefore addresses the practical ability to preserve provision, access records and organise a transition, alongside the right to restrict or terminate the relationship.

The University's objective is to intervene early where risks emerge, using enhanced monitoring, recruitment controls or partial step-in arrangements to protect students and sustain delivery. To date, none of the University's UK partners has experienced delivery failure. Closures and teach-out arrangements have arisen more often within transnational education partnerships, principally in response to changes in host-country regulation rather than partner failure. In these circumstances, the priority is to enable students to continue and complete their studies through lawful and academically appropriate arrangements. Depending on local requirements, this may involve teach-out at the existing location, an approved alternative mode of delivery or a supported transfer.

Step-in arrangements give the University contractual rights to take over delivery where a partner can no longer sustain provision. Wherever feasible, the preferred approach is to keep students at their existing location while the University assumes direct responsibility for teaching, supported by contractual provisions for the transfer of staff under TUPE – the Transfer of Undertakings (Protection of Employment) arrangements.

Financial and operational safeguards support this capability. UK partners must lodge a minimum step-in deposit of £200,000 per partnership per campus, which the University is contractually entitled to draw on when exercising its step-in rights. This provides funds towards maintaining delivery and protecting students, although it does not necessarily cover the full cost of teach-out. The University also prepares 'shadow step-in costings': estimates of the costs of responding to different delivery-failure scenarios, including direct University delivery, supported transfer to another provider and student compensation. These estimates inform contingency planning and the assessment of potential financial exposure. Minimum income guarantees, student-number controls, insurance and indemnity provisions provide additional safeguards.

Using shared University systems helps the University act quickly when problems arise at a partner. Partner students are registered on the University's student records system and use its online learning platform to access teaching materials, learning activities and assessments. They also receive University email accounts and secure access to these systems. This gives the University access to attendance, engagement and assessment information and enables direct communication with students. If the University needs to take over teaching, these systems support a rapid transition while preserving students' marks, assessment submissions and academic records.

The contractual and operational model is designed to reduce dependence on a partner's continued cooperation or financial capacity. Step-in remains subject to practical and legal feasibility, including access to premises, staff and necessary permissions. A deposit is a safeguard, not a guarantee that every failure can be resolved at the existing campus; alternative arrangements may be required.

Partnership closure is consequently treated as a managed institutional process rather than simply the termination of a contract. Where closure is necessary, a formal partnership closure plan protects existing students, maintains continuity of learning and assessment, preserves academic standards and defines responsibilities and timelines.

The Framework also provides for an end of contract review, bringing together long-term performance, student outcomes, academic quality, regulatory and contractual compliance, financial sustainability, governance, strategic alignment and historic interventions.

The outcome may be renewal, extension, expansion, conditional renewal, teach-out or closure. Continuation of a partnership is therefore itself an evidence-based institutional decision.

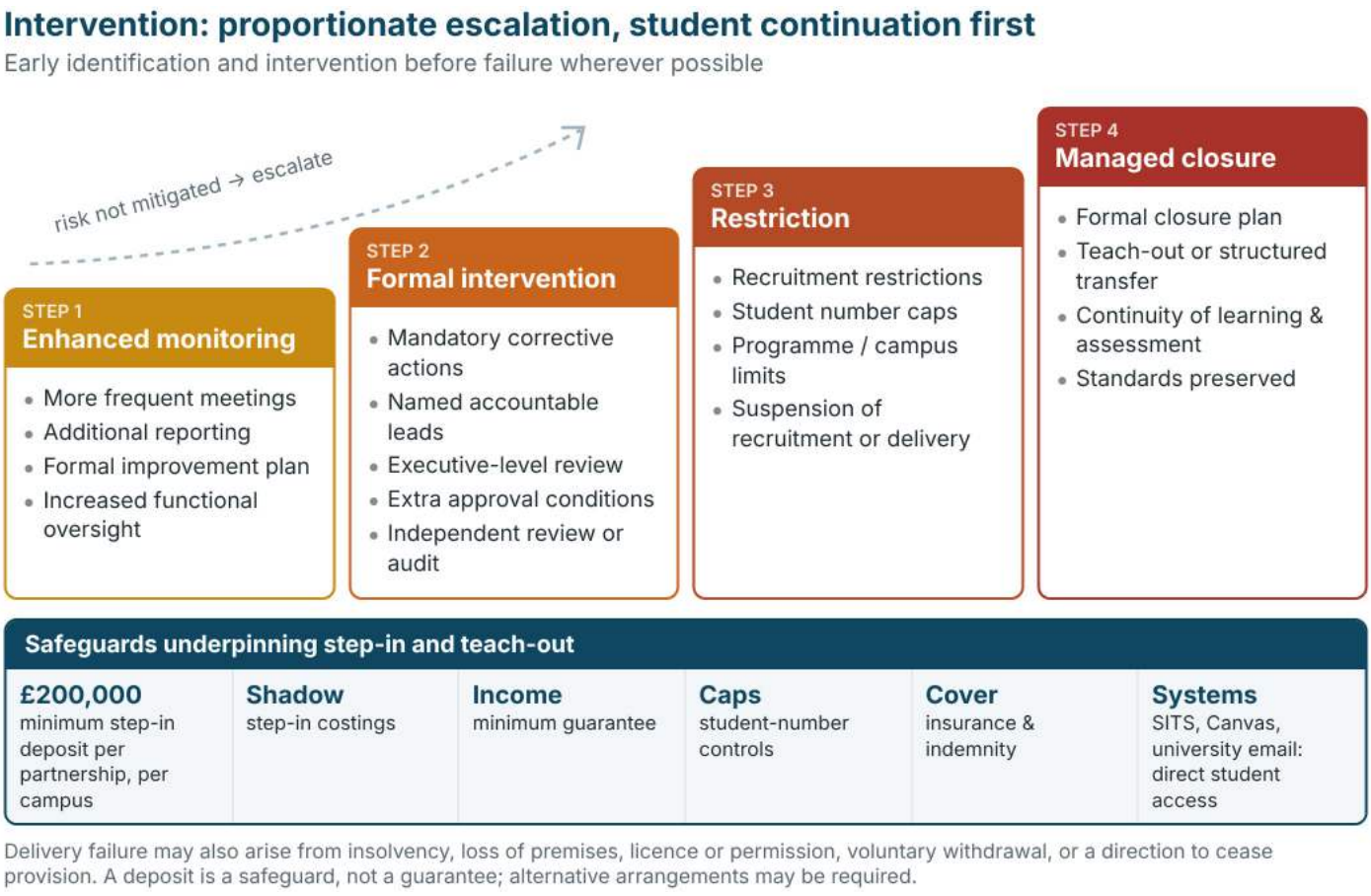


Figure 7: *Intervention escalation pathway and the safeguards that underpin step-in and teach-out (AI generated)*

4. Governance and assurance

Effective partnership accountability cannot stop at individual partnerships. Institutional governance also needs visibility of the overall portfolio, emerging systemic risks and the effectiveness of the controls applied across the partnership lifecycle.

The Partnership Approval and Performance Board (PAPB) provides an important institutional oversight mechanism. It receives annual partnership reports, portfolio dashboards, RAG summaries, escalated risks, regulatory and quality matters, student outcome trends, financial and contractual reporting and recommendations for enhanced monitoring or intervention. Material, strategic or regulatory risks can then be escalated through the University's wider governance framework.

The Board of Governors retains ultimate responsibility for ensuring that partnerships are governed effectively and that associated risks are managed consistently within the University's regulatory obligations and risk appetite. The Director of Educational Partnerships has a standing agenda item at each Audit & Risk Committee and Board of Governors meeting covering significant portfolio changes, material risks, reportable events, delivery failures and key mitigations.

Taken together, these controls demonstrate the principle that partnership assurance is not simply a technical activity delegated to specialist teams. At Wolverhampton, the controls governing partnership risk have been considered and agreed through the University's institutional governance arrangements, with the Board of Governors retaining ultimate oversight. EPU provides the operational and portfolio-level assurance necessary to make that governance effective, while academic quality and standards remain subject to the University's established academic governance arrangements.

This provides a direct institutional response to the wider point that partnership governance should not be regarded as a niche technical issue. Partnership governance at Wolverhampton is connected directly to institutional governance, risk appetite and Board-level accountability.

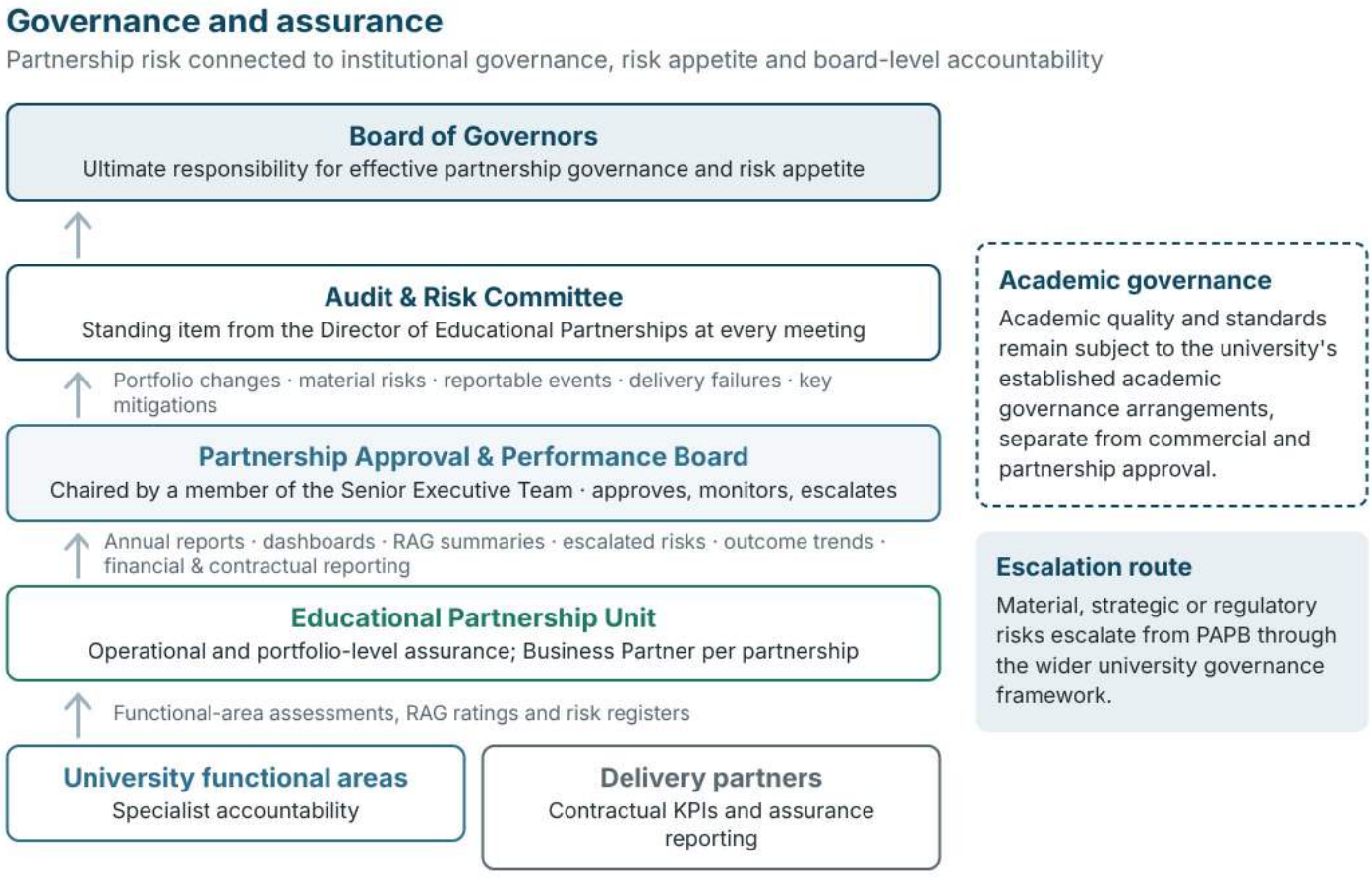


Figure 8: *Partnership governance and assurance reporting lines (AI generated)*

5. Recommendations

The existing Universities UK, GuildHE and Committee of University Chairs framework provides a foundation for strengthening partnership governance. Wolverhampton's Partnership Control, Compliance and Assurance Framework offers an operational model that could support further development and implementation. The University proposes working with sector bodies, regulators and other institutions to develop, pilot and evaluate shared operational requirements. We propose five priorities.[11]

1. Build on the existing sector framework

The Quality Assurance Agency for Higher Education (QAA) could convene a working group involving lead providers, delivery partners, students and relevant regulators. The group could build on the published franchise governance framework and align its work with the UK Quality Code, using Wolverhampton's framework as an operational model to develop and test with other institutions.[12]

The group could map the existing governance principles to named responsibilities and evidence requirements at each stage of the partnership lifecycle. Wolverhampton's approach could help specify approval gateways, the division of specialist accountability, admissions and agent controls, performance dashboards, intervention triggers and the resources needed for step-in and teach-out. Shared templates and assessment criteria could then be piloted across different institutional settings, with proportionate adaptations for each UK nation and delivery model.

2. Establish consistent assessment and regulatory expectations

Governing bodies could receive annual assurance showing how the sector framework is implemented in practice, supported by periodic independent review. A shared operational model would help reviewers test whether responsibilities are fulfilled, evidence is reliable and interventions and recovery arrangements can be activated when required. In England, the Office for Students could draw on the resulting evidence to strengthen guidance and assessment under Condition E10. Wolverhampton could serve as one of the pilot institutions, alongside providers with different partnership portfolios, to test effectiveness, costs and proportionality before wider adoption.

3. Make growth conditional on student outcomes

The principle that growth could be supported by strong student outcomes could apply across higher education, including provision delivered directly by universities. In subcontracting partnerships, explicit recruitment controls would give practical effect to this principle where the lead institution retains accountability but teaching is delivered by a separate organisation. They would help ensure that expansion does not outpace either the partner's capacity to teach and support students or the lead institution's capacity to oversee delivery.

A proposed framework for partnership provision in England could link recruitment growth to published continuation, completion and progression outcomes, benchmarked against comparable provision at the lead institution:

- **Below the benchmark:** recruitment held, with no growth and an improvement plan required.
- **Equivalent to the benchmark:** growth of up to an agreed X%.
- **Above the benchmark:** a higher growth allowance of up to Y%.

Meeting the benchmark would not create an entitlement to expand. Growth decisions could also consider the applicable OfS minimum thresholds for student outcomes and any unresolved concerns about teaching quality, academic standards, governance or financial sustainability. Matching a lead institution whose own outcomes are weak would therefore be insufficient grounds for growth.

The Office for Students, the Department for Education and the Student Loans Company could explore how agreed recruitment allowances could be reflected in limits on publicly-funded new entrants, including any legal or operational changes required. These limits should be reviewed following relevant OfS data releases and informed by more recent monitoring evidence, recognising the time lag in published outcomes. New partners should operate within probationary caps; serious or persistent underperformance should trigger consideration of reduced recruitment or suspension, with arrangements to protect existing students.

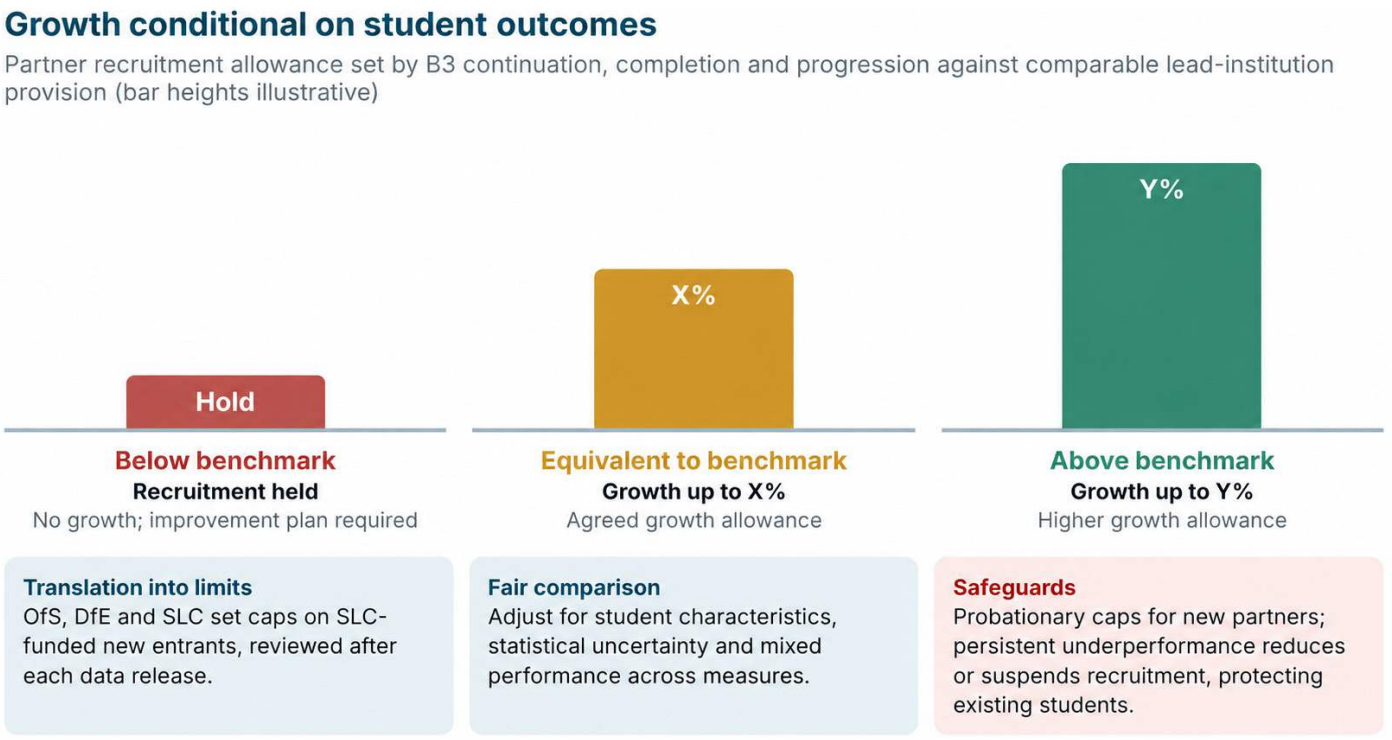


Figure 9: *Proposed model linking partner recruitment growth to B3 student outcomes (X% and Y% to be agreed) (AI generated)*

4. Establish national partnership student protection

Building on Wolverhampton's £200,000 campus deposit and step-in planning, the Department for Education, the Office for Students and sector bodies could develop a national pooled deposit or insurance scheme. Delivery partners should contribute proportionately on entry and throughout operation.

The scheme should fund teach-out and supported transfer where delivery or oversight fails, strengthening taxpayer confidence and government assurance. Australia offers a useful precedent: its Tuition Protection Service, funded through compulsory levies on relevant providers, helps affected students access replacement courses or receive tuition refunds or loan re-credits following provider default. A UK partnership scheme could draw on this pooled approach while preserving lead-provider accountability and allowing recovery of costs from responsible parties where appropriate.[13]

5. Evaluate implementation and its effect on access

The Department for Education and the Office for Students could commission an independent review of the new registration requirement. From 2028/29, delivery partners with 300 or more franchised students must normally be registered with the Office for Students for new students to access public student finance. Some exemptions apply.[14]

The review should answer two questions: Are the new rules protecting students and public money? Are they making it harder for some people to access higher education?

Before the rules take effect, the review could record who studies through these partnerships, where courses are available and how well students succeed. It could also record funding misuse, closures, student transfers and the costs of oversight. Attention could be given to disadvantaged and mature students who depend on local provision.

After two academic years, the review could compare the position before and after the change. For example, have funding misuse and disruption to students fallen? Have college closures left some communities without accessible courses? Where possible, comparisons with providers unaffected by the rules should help identify which changes result from the registration requirement.

Further reviews should assess whether students complete their courses and move into professional employment or further study. The findings could guide improvements to the rules and the wider partnership framework.

6. Conclusion

Partnership provision can extend educational opportunity, but accountability requires clear ownership, reliable evidence and credible recovery arrangements. Wolverhampton's framework shows how these requirements can be translated into institutional practice. The next step is to build on the Universities UK, GuildHE and Committee of University Chairs framework with a tested operational model, connect growth to student outcomes, strengthen verification and test student protection against realistic failure scenarios.

A stronger framework must be evaluated against what happens to students, rather than the volume of assurance paperwork produced. In this respect, partnership accountability is part of institutional resilience itself.

Endnotes

1. Vicki Stott, A partnership accountability framework for a more resilient higher education sector, HEPI Policy Note 73, 6 August 2026 **https://www.hepi.ac.uk/reports/a-partnership-accountability-framework-for-a-more-resilient-higher-education-sector/**; Department for Business and Trade, Department for Education and Foreign, Commonwealth & Development Office, The UK's International Education Strategy 2026, 20 January 2026 **https://www.gov.uk/government/publications/the-uks-international-education-strategy-2026**

2. London South Bank University, 2025 English Social Mobility Index, published by HEPI, 24 March 2026 **https://www.hepi.ac.uk/reports/2025-english-social-mobility-index/**

3. Teaching and Higher Education Act 1998, section 22 **https://www.legislation.gov.uk/ukpga/1998/30/section/22**; Education (Student Support) Regulations 2011, SI 2011/1986 **https://www.legislation.gov.uk/uksi/2011/1986/contents**; Department for Business, Innovation and Skills, Higher Education: Students at the Heart of the System, Cm 8122, June 2011 **https://assets.publishing.service.gov.uk/media/5a79900ce5274a684690a79c/11-944-higher-education-students-at-heart-of-system.pdf**; House of Commons Library, 'The expansion of private higher education', 2015 **https://www.parliament.uk/business/publications/research/key-issues-parliament-2015/education/higher-education**/

4. Higher Education and Research Act 2017, Part 1 and accompanying explanatory notes; Department for Education, Government Response to the Franchising in Higher Education Consultation, written statement HCWS1141, 9 December 2025 **https://www.legislation.gov.uk/ukpga/2017/29/notes/division/3/index.htm**; **https://questions-statements.parliament.uk/written-statements/detail/2025-12-09/hcws1141**

5. Department for Education, Government Response to the Franchising in Higher Education Consultation, written statement HCWS1141, 9 December 2025. Percentage increase calculated by the authors: (135,850 – 50,430) ÷ 50,430 × 100 = 169.4% **https://questions-statements.parliament.uk/written-statements/detail/2025-12-09/hcws1141**

6. National Audit Office, Investigation into student finance for study at franchised higher education providers, HC 387, 18 January 2024, pp.7-9 **https://www.nao.org.uk/reports/investigation-into-student-finance-for-study-at-franchised-higher-education-providers/**

7. Office for Students, Condition E10: Subcontracting, 2026, paragraphs E10.1–E10.6 and E10.12 and accompanying guidance, paragraphs 3–9 **https://www.officeforstudents.org.uk/media/24vjecje/conditione10-condition-and-guidance.pdf**

8. Department for Education, Franchise arrangements for higher education providers, 2026, sections Franchising in higher education, Existing students and Franchised student headcount. **https://www.gov.uk/government/publications/franchise-arrangements-for-higher-education-providers/franchise-arrangements-for-higher-education-providers**

9. Vicki Stott, A partnership accountability framework for a more resilient higher education sector, HEPI Policy Note 73, 6 August 2026 **https://www.hepi.ac.uk/reports/a-partnership-accountability-framework-for-a-more-resilient-higher-education-sector/**

10. Home Office, Student sponsor guidance: Sponsorship duties, paragraphs 5.13–5.14; Immigration Rules: Appendix Student, paragraph ST 13.1. The immigration benchmark is cited for context; the University admissions requirement is a separate institutional requirement **https://www.gov.uk/government/publications/student-sponsor-guidance; https://www.gov.uk/guidance/immigration-rules/immigration-rules-appendix-student**

11. Universities UK, GuildHE and Committee of University Chairs, Franchise governance framework, July 2024 **https://www.universitiesuk.ac.uk/what-we-do/policy-and-research/publications/franchise-governance-framework**

12. Universities UK, GuildHE and Committee of University Chairs, Franchise governance framework, July 2024 **https://www.universitiesuk.ac.uk/what-we-do/policy-and-research/publications/franchise-governance-framework**; Quality Assurance Agency for Higher Education, UK Quality Code for Higher Education 2024, Principle 8, June 2024 **https://www.qaa.ac.uk/the-quality-code/2024**

13. Australian Government Department of Education, About the Tuition Protection Services (TPS); Higher Education Students. **https://www.education.gov.au/tps/about-tuition-protection-services-tps**; **https://www.education.gov.au/tps/higher-education-students**

14. Department for Education, Franchise arrangements for higher education providers, 2026, sections Franchising in higher education, Existing students and Franchised student headcount **https://www.gov.uk/government/publications/franchise-arrangements-for-higher-education-providers/franchise-arrangements-for-higher-education-providers**

99 Banbury Road, Oxford OX2 6JX

admin@hepi.ac.uk

www.hepi.ac.uk

@HEPI_news