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# Operating Plan

## 2026

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# Introduction

Students and higher education providers continue to face substantial and evolving challenges; from financial pressure, to rising costs of living, to responding to duties and expectations, and to maintaining good governance, there are wide ranging pressures and uncertainty across the sector. It is within this context that we set out our plans and ambitions for 2026 as an Ombudsman scheme, supporting higher education students whilst reaffirming our commitment to fairness, independence, and serving the public benefit.

Our charitable purpose is to advance education for public benefit through the independent review of student complaints in England and Wales, and by using the learning from those complaints to support improvement in policies and practices across the sector. This dual purpose remains at the heart of everything we do and forms the basis of our plan for the year ahead.

In 2025 we launched our new strategy centred on two long-term organisational objectives and four strategic priorities. Across 2026, our focus remains on improving students' experience by providing a fair, accessible, and independent process for resolving complaints, and by using the insights we gain to influence positive change within a rapidly shifting higher education landscape.

This Operating Plan sets out what we will do during 2026 to take forward each area of our strategy. It outlines the specific activity, improvements, and commitments that will guide our work over the year, and describes what we intend to have achieved by the time we reach 2027. Our ambition is to continue strengthening our service, supporting providers in improving their own processes, and contributing to a more effective, fair, and student-centred higher education system.

# How we are approaching 2026

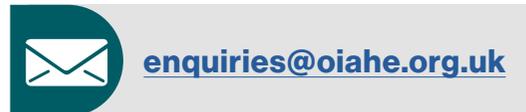
For us, 2026 will be a critical year. Having embarked on our strategic plan with an extensive element of review, 2026 will be an opportunity to focus on delivering the change we envisaged in the development and refinement of our planning. We remain rooted in four interconnected but distinct priorities to enable us to learn from complaints and to provide early resolution.

Our plan is therefore contained within these four priorities. These are:

1. Fundamentally reviewing our casework process to ensure it has service users at its heart, is as efficient as possible, and is focused on effective resolution and remedy;
2. Increasing the effectiveness of our influencing in support of our objectives;
3. Improving the quality of our evidence, both data and insight, to improve our organisational performance and effectiveness of influencing; and
4. Increasing the effectiveness of the organisation, to build on and strengthen our one organisation approach, ensuring we can respond to the demands of the other priorities, and create an environment in which all our people can thrive.

By the end of 2026, we will have made a visible difference to the way we work. We will continue to implement a range of strategies, programmes, and projects that enable us to operate in increasingly efficient, flexible, and distinct ways, whilst continuing to serve our stakeholders, providers, partners, and most importantly students.

We welcome your feedback and you can find out more about our work via:



# Our plan for 2026: what we will do and why it matters

The plans we set out for 2026 reflect more than a list of activities. They describe how the OIA will continue to play a vital, stabilising and forward-looking role in a higher education system facing unprecedented pressures. This Operating Plan matters because of the challenges ahead, rising costs, increasing complexity in student need, structural uncertainty for providers, and heightened expectations of fairness, demand a system of redress that is accessible, independent and grounded in real experience.

Our work sits at the intersection of individual justice and sector-wide learning. Every complaint we review is an opportunity to put something right for a student who may have exhausted all other options. Taken together, these complaints form a body of insight that helps providers improve their own processes, strengthens accountability and supports better outcomes for future students. In a landscape where confidence in institutions and systems is being tested, the OIA's independence, impartiality and expertise are more important than ever.

The priorities in this plan show how we will continue to evolve to meet that responsibility. By modernising our casework processes, further strengthening our influence, improving the quality of our data and insight, and investing in our people, culture and systems, we are ensuring that the organisation is equipped for the complexity and scale of the years ahead. We are not only responding to change, we are helping shape the environment in which fairness for students is protected and improved.

Our role in the regulatory framework continues to be a significant one. Providers, governments, regulators and students rely on us not only to resolve complaints, but also to illuminate emerging risks, guide good practice, and speak independently to issues that affect the student experience at system level. As the boundaries of higher and tertiary education continue to shift, including the expansion of our remit in Wales, our capacity to provide clarity, insight and fair redress will remain essential.

The commitments in this Operating Plan are important because they strengthen the foundations of a fairer higher education system. They ensure that students who need us can reach us; that providers can learn from what we see; and that policymakers have access to evidence grounded in the lived realities of students across the sector.

In 2026 we will build on our strengths while embracing the change needed to remain effective, trusted and impactful. The OIA's purpose, to advance education for public benefit through the independent review of student complaints in England and Wales, and by using the learning from those complaints to support improvement in policies and practices across the sector, continues to be not only relevant, but indispensable.

This plan positions us to deliver that purpose with even greater confidence, clarity and influence in the year ahead.

# Our Strategy, objectives and priorities explained

Our overall strategy sets out objectives for the OIA. Our first objective is that we will be trusted to deliver fair decisions, to treat everyone equitably, to improve students' experiences, to listen and act independently, and to be reasonable. Related to this is that we will be valued for our expertise, integrity and efficiency.

Our second objective is to have impact so that the sector is better at handling complaints and using learning from complaints and wider experience to bring improvements.

Flowing from this we have four priority areas of work:

1. Casework
2. Stakeholder engagement
3. Strengthening our evidence base
4. Organisational and cultural development

A review of the work we carried out in relation to our priorities is set out in the following pages.

## Priority 1:

**To fundamentally review our casework process to ensure it has service users at its heart, is as efficient as possible, and is focused on effective resolution and remedy.**

In 2025 we saw the continued growth in the volume and complexity of complaints, reaching the highest number of receipts in our history. Student needs and expectations are shifting rapidly, shaped by financial pressures, digital transformation, and the growing diversity of the student body. At the same time, the higher education sector is navigating significant uncertainty and structural change. Within this context, our role: independent, impartial, and user-focused, has never been more important.

As we look towards 2026, we know we must continue to offer processes that are accessible, easy to navigate, and responsive to the realities faced by students and providers. This means ensuring that our service is sufficiently flexible to meet different needs, while maintaining the clarity, consistency, and independence that underpin trust in our work. We will continue modernising and improving our processes so that all who need our service can understand it and use it confidently.

Trust in our decisions remains paramount. In 2026, we will maintain a strong focus on delivering fair outcomes, based on robust decision-making, proportionate approaches, and a clear understanding of what is achievable in the circumstances of each complaint. We will continue to make thoughtful use of early dispute resolution techniques where these offer the best and quickest path to a fair resolution, while using more traditional Ombuds reviews where these are necessary to address the issues fully and effectively.

Our learning for the sector continues to be driven by our unique data and insights, which provide a system-wide view of student experiences and provider practice. In 2026, we will build on the strengths of our Good Practice Framework and outreach work to provide targeted, practical support to providers as they navigate an increasingly complex environment. We will continue to help identify where internal complaints processes are not working as they should and support providers in developing more effective, transparent, and timely approaches.

A core part of our mission remains promoting a positive and constructive culture around complaints. In 2026, we will continue advocating for the value of complaints as opportunities for learning, helping the sector to see not only where things go wrong, but how systems and processes can be strengthened to improve the student experience more broadly.

# Our plans to continue delivering against Priority 1 include:

What we plan to do	What this will look like
<p><b>We will undertake a casework process review.</b></p>	<ul style="list-style-type: none"> <li>• Creating and confirming a detailed specification of requirements, including data.</li> <li>• Identifying a range of technical and communications opportunities before developing and internally testing process proposal.</li> <li>• Consulting on the proposed new process with students, student representative bodies, and providers.</li> </ul>
<p><b>We will undertake a review of the Scheme.</b></p>	<ul style="list-style-type: none"> <li>• Reviewing the Scheme structure and requirements.</li> <li>• Consulting (internally and externally) on the proposed changes to the Scheme rules.</li> <li>• Revising guidance, internal training, and development for students, student representative bodies, providers, and our own colleagues.</li> </ul>
<p><b>We will provide a timely, responsive service, letting students know as soon as possible whether we can look at their complaint, and resolving complaints as quickly as we can.</b></p>	<ul style="list-style-type: none"> <li>• Meeting our key performance indicators for the timeliness of our case-handling process:               <ul style="list-style-type: none"> <li>• Responding to 95% of enquiries within two working days.</li> <li>• Making 90% of eligibility decisions (or requesting further information) within 10 working days.</li> <li>• Closing 75% of cases within six months of receipt.</li> </ul> </li> </ul>
<p><b>We will take a risk based and proportionate approach, building on the flexibility and efficiency of our service.</b></p>	<ul style="list-style-type: none"> <li>• Developing an OIA approach to early and proportionate complaint resolution - where that will give the best opportunity for resolution and remedy.</li> <li>• Continuing work to promote the benefits to all parties of the use of settlements.</li> <li>• Implementing reviews of our core processes to ensure sustainability of our service and to improve service-user experience.</li> </ul>

<b>What we plan to do</b>	<b>What this will look like</b>
<p><b>We will further develop our processes and systems to provide an accessible and inclusive service for students and providers.</b></p>	<ul style="list-style-type: none"> <li>• Carrying out research to inform best practice in further development of our systems and processes for accessibility and inclusivity.</li> <li>• Seeking the views of students, their representatives, and our provider contacts to inform our planning for systems development.</li> <li>• Implementing our new Communication strategy.</li> </ul>
<p><b>We will develop our mechanisms for listening to what students tell us about how they experience our service and use this to further improve what we do.</b></p>	<ul style="list-style-type: none"> <li>• Reviewing the effectiveness of our processes for obtaining feedback from service users, including service complaints.</li> <li>• Developing our systems for identifying learning opportunities from complaints about our service and challenges to our decisions, including through new technological configurations.</li> </ul>
<p><b>We will develop a new quality assurance framework.</b></p>	<ul style="list-style-type: none"> <li>• Making our service better by supporting our colleagues' learning and development.</li> <li>• Ensuring that learning from our amended quality assurance systems feeds forward into our ongoing casework.</li> <li>• Developing a new framework alongside embedding new technical approaches, reporting requirements, and clarity in oversight mechanisms.</li> </ul>
<p><b>We will build on our capacity to feedback on learning from complaints to promote good practice.</b></p>	<ul style="list-style-type: none"> <li>• Developing our strategy to focus on delivering impact for students and the wider sector through a range of markers including stakeholder engagement, direct student communications, and wider case studies.</li> <li>• Improving our systems for identifying, recording, and reporting on the drivers of complaints.</li> </ul>
<p><b>We will develop our approach to what early resolution looks like in terms of process.</b></p>	<ul style="list-style-type: none"> <li>• Developing new technical solutions that allow students to “self-guide” their enquiries before submitting formal requests.</li> <li>• Developing improved information on the benefits (for providers and students) of early resolution.</li> </ul>

## Priority 2:

# To increase the effectiveness of our influencing in support of our objectives.

In 2026 we will build on the progress made in 2025 to further strengthen our good practice, outreach, and sector-influence work, ensuring that it remains responsive, evidence-based, and aligned with our organisational priorities.

We will continue to evaluate the effectiveness and reach of our good practice activities, using data, feedback and evaluation findings to focus our resources on approaches that demonstrably support student fairness and provider learning. Our aim is that our guidance, insights, and outreach reach all those who can benefit from them, in formats that are accessible, practical, and proportionate for different types of providers and students.

We will remain closely engaged with live issues affecting students and providers, including the continuing financial pressures across the sector, cost-of-living challenges for students, and the operational pressures faced by students' unions and advice organisations. Through active listening, collaborative engagement, and ongoing analysis of the complaints we see, we will update and develop our good practice guidance to reflect emerging risks, learning, and sector need.

As an organisation recognised for our independence, data, and expertise, we will continue to play a constructive role in the wider regulatory landscape. In 2026 we will further our work with governments, statutory bodies, sector agencies, and networks, maintaining the balance between our independence and the interdependence required for an effective system of student protection and redress. Our data and insights will continue to inform debate on emerging policy issues, including those affecting student engagement, and provider financial stability.

We will use our standing and relationships to support greater focus on the student voice and experience, both within individual providers and across the sector. This will include continuing work with governments to close gaps in access to our own service for all students who may benefit from it, reducing barriers and improving awareness, including through digital modernisation and outreach relationships. We plan to begin the process of expanding our service to tertiary students in the Welsh context.

We will continue to contribute actively to the Ombudsman Association (OA) and the European Network for Ombuds in Higher Education (ENOHE), sharing learning, benchmarking our approach, and ensuring that our practice remains aligned with sector-wide standards of excellence. Through these networks we will bring international and cross-sector insight into our work and share our experience of operating within a rapidly changing higher education landscape.

## Our plans to continue delivering against Priority 2 include:

What we plan to do	What this will look like
<b>We will establish new, and develop existing, relationships to maintain and enhance our ability to influence.</b>	<ul style="list-style-type: none"><li>• Engaging with political and policy development on areas relevant to our work and maintaining effective working relationships with officials and stakeholders.</li><li>• Working with the Office for Students (OfS), Medr, Department for Education (DfE), Welsh government, other regulators and Professional, Statutory and Regulatory Bodies (PSRBs) so information is shared as appropriate, and we are involved in relevant discussions around their emerging priorities.</li><li>• Attending relevant meetings and participating in discussions relevant to our work, including with the DfE, the Welsh government, National Union of Students, the UK Quality Council, the Quality Assurance Agency, and the Competition and Markets Authority.</li><li>• Enhancing our outreach programme and the resources available on our website for providers, student representative bodies and others. We use feedback from participants and our wider engagement together with insight from our casework to inform the topics we cover and the way we deliver them.</li></ul>
<b>We will continue to deepen our work through the Low and High Engagement Provider projects.</b>	<ul style="list-style-type: none"><li>• Engaging with providers with higher volumes of OIA complaints to explore more effective ways to identify and share learning from complaints.</li><li>• Likewise, engaging with providers with low direct engagement with us to ensure that our good practice work is benefitting these members and their students.</li></ul>

What we plan to do	What this will look like
<p><b>We will draw on developing casework themes, trends, and examples to illuminate issues that can improve students' experiences.</b></p>	<ul style="list-style-type: none"> <li>• Publishing information about our approach and learning from the complaints we see, for example in casework notes and case summaries. We share information from our casework with other organisations working on priority areas and lead conversations where we can put our unique intelligence to wider public good.</li> <li>• Completing our consultation with students, student representative bodies, providers, and other relevant stakeholders and publishing the new section of the Good Practice Framework: Handling complaints about harassment and sexual misconduct.</li> <li>• Identifying the full range of data requirements to enable a new approach to the collection and processing of data systems and reporting tools.</li> <li>• Developing “gateway guidance” to supplement detailed operational guidance for other audiences, such as students or student representative bodies.</li> </ul>
<p><b>We will engage with Welsh tertiary providers and student representative bodies.</b></p>	<ul style="list-style-type: none"> <li>• Continuing to work with the Welsh government and Medr to support the continued development of an integrated tertiary system by preparing the OIA and providers for the move towards our independently reviewing complaints from further education students.</li> </ul>
<p><b>We will begin work to re-develop our annual statements.</b></p>	<ul style="list-style-type: none"> <li>• Consulting with providers, student representative bodies, and other stakeholders about how annual statements are used and to explore what changes would promote the use of complaints data as a driver for change.</li> <li>• Development of new technical solutions.</li> </ul>

What we plan to do	What this will look like
<p><b>We will ensure that we can offer independent and evidence-based perspectives on issues of interest to the sector.</b></p>	<ul style="list-style-type: none"> <li>• Bringing our distinct perspective, drawing on what we learn from reviewing complaints, to a wide range of policy areas including those in development which will have an impact on our Scheme.</li> <li>• Continuing our focused work on the impact of provider closure, whether course, campus, or market exit, on individual students. This will help consideration of better outcomes for individual students where possible and will mitigate the risk of the OIA receiving complaints where there is little option of a remedy. This will encompass: <ul style="list-style-type: none"> <li>• Continuing work to identify and share effective practices that will support providers in England and Wales in navigating challenging financial circumstances with a particular focus on mitigating the impact on students.</li> <li>• Inputting our expertise and working with the governments and others considering potential solutions for students who might have no remedy following a market exit.</li> <li>• Working with individual providers who may be considering closures to ensure they have taken on board learning and good practice and attending multi-agency task forces where helpful.</li> <li>• Engaging with student representative bodies supporting groups of students affected by closure.</li> </ul> </li> </ul>
<p><b>We will emphasise the benefits of early resolution for both students and providers.</b></p>	<ul style="list-style-type: none"> <li>• Developing a range of improved and accessible information for students and student representative bodies.</li> <li>• Continuing to develop our operational advice and guidance to share approaches that have resolved complaints quickly and to demonstrate the benefits of early resolution.</li> </ul>



## Priority 3:

**To improve the quality of our evidence, both data and insight, to improve our organisational performance and effectiveness of influencing.**

Delivering high-quality, efficient casework and influencing change across the sector depends on access to accurate, timely and well-structured data and information. In 2026, we will continue to strengthen how we capture, manage and use data so that it supports our strategic objectives and provides meaningful insight into the issues students and providers are facing.

We will focus on capturing information that is genuinely valuable, in a consistent, coherent and proportionate way. We remain mindful of the burden that data collection places both on our own organisation and especially on the wider sector, and we will continue to follow a “collect once, use often” principle wherever possible. Throughout 2026, we will build our reporting and analytical capability, enhance systems integration, and continue exploring emerging technologies that can support more efficient processes and richer insights.

Access to accurate and timely information about the higher and tertiary education environment is essential to the effective operation of the Scheme. Up-to-date intelligence on the size, structure and composition of providers supports everything from membership administration to risk assessment and policy engagement. Similarly, data about the student body enables us to understand the context in which complaints arise, identify emerging trends, and ensure that our work reflects the diversity of students' experiences.

## Our plans to continue delivering against Priority 3 include:

What we plan to do	What this will look like
<p><b>We will continue to grow our capacity and capabilities in data analysis.</b></p>	<ul style="list-style-type: none"> <li>• Building on work to embed quality data as a shared responsibility and a shared asset across the organisation. This includes:               <ul style="list-style-type: none"> <li>• Accurate data recording into all areas of the organisation.</li> <li>• Training and resources to support all staff in entering data and in making use of reporting tools, including a new suite of PowerBi dashboards.</li> <li>• Up-to-date knowledge of tools and best practice within data-focused roles, including engaging with emerging AI technology.</li> <li>• Developing our capacity within the Data and Insights team.</li> </ul> </li> </ul>
<p><b>We will ensure continued compliance with information regulatory requirements.</b></p>	<ul style="list-style-type: none"> <li>• Implementing work to address any issues identified in the Data Protection compliance gap analysis and to meet requirements of the Data Use and Access Act 2025.</li> <li>• Keeping under review the implementation of the Digital Markets Competition and Consumers Act 2024 and its impact on our role as an approved ADR body.</li> </ul>
<p><b>We will explore new external data sources to support our normalisation and exploration of data sources.</b></p>	<ul style="list-style-type: none"> <li>• Developing data in line with HEIDI Plus datasets for the purposes of contextualisation.</li> </ul>
<p><b>We will review our data governance and records management practices.</b></p>	<ul style="list-style-type: none"> <li>• Creating a standalone project to review areas of established and emerging practices including through an institutional approach to the use of artificial intelligence (AI).</li> <li>• Implementing a new approach to retention management.</li> </ul>

## Priority 4:

**To increase the effectiveness of the organisation, to build on and strengthen our one organisation approach, ensuring we can respond to the demands of the other priorities, and create an environment in which all our people can thrive.**

Our new strategy sets out a period of deliberate and systematic development of our leadership, culture, people, and systems. In 2026, we will continue to strengthen the capability and capacity we need to deliver our strategic priorities effectively and sustainably.

We will put in place the mechanisms needed to balance resources and prioritise activity, ensuring that we can deliver necessary organisational change while responding to high levels of casework and related demand. This will include identifying and addressing practices that create inefficiencies, strengthening our internal processes, and ensuring that our people have the tools and support they need to carry out their roles effectively.

A key priority for 2026 will be continuing to build an organisational culture and working environment that is focused on learning, development, and continuous improvement. We will support our people to develop their skills, confidence, and leadership capability, and foster a workplace where reflective practice, collaboration, and innovation are encouraged and valued.

# Our plans to continue delivering against Priority 4 include:

What we plan to do	What this will look like
<p><b>We will develop our leadership and management roles.</b></p>	<ul style="list-style-type: none"> <li>• Reviewing our approach to leadership and management and implementing a suite of clearly defined competencies and behaviours followed by bespoke external training and coaching for leaders and managers.</li> </ul>
<p><b>We will implement benchmark measures and indicators to support continuing development.</b></p>	<ul style="list-style-type: none"> <li>• Implementing our newly devised Performance Framework which will examine data from across casework, HR, finance, and communications elements.</li> <li>• Developing a suite of dashboards itemising organisational profile and workforce planning data.</li> <li>• Implementing our enhanced approach to Risk Management.</li> </ul>
<p><b>We will work with our people to promote their on-going engagement and ensure appropriate modes for employee voice.</b></p>	<ul style="list-style-type: none"> <li>• Building on the insight from the recognition agreement with the GMB Union:               <ul style="list-style-type: none"> <li>• Strengthening employee voice to promote meaningful two-way communication and engagement.</li> <li>• Work to develop systems and framework for learning and development including through a new Personal Development Programme.</li> </ul> </li> <li>• Introducing new Pulse surveys to help understand emerging issues across the workforce.</li> <li>• Align People &amp; Culture more closely with all teams through a new partnership model as well as strengthening data informed people planning and decision making.</li> </ul>
<p><b>We will implement a new Communications Strategy.</b></p>	<ul style="list-style-type: none"> <li>• Devising and launching a new Communications Strategy based around established communications principles.</li> <li>• Enshrining accessibility standards and simple and direct language as a way in which we deliver effective messages.</li> <li>• Refining our approach to the student voice through the introduction of new feedback mechanisms that ensure messages are tailored and effective for audiences.</li> <li>• Developing a refreshed and accessible web presence as well as exploring new social channels, media, and forms.</li> </ul>

<b>What we plan to do</b>	<b>What this will look like</b>
<b>We will implement a new artificial intelligence (AI) and technology strategy.</b>	<ul style="list-style-type: none"> <li>• Reviewing and assessing two distinct areas of our work, with differential risk profiles, with a view to implementing AI to assist specific casework processes, alongside broader organisational aspects where AI could be more readily implemented.</li> </ul>
<b>We will ensure our technical environment continues to support our operations.</b>	<ul style="list-style-type: none"> <li>• Introducing a new IT support ticketing system that will enable broader team effectiveness.</li> <li>• Reviewing and implementing changes to our existing intranet provision alongside ensuring the highest standards of data governance.</li> </ul>
<b>We will fully implement our new governance structure, ensuring the continuation of the highest standards.</b>	<ul style="list-style-type: none"> <li>• Continuing to recruit Trustees/Directors to the vacant positions on our Board following the completion of our governance review, ensuring appropriate perspectives are captured and with an eye to encouraging those new to Non-Executive roles alongside established Non-Executive Directors.</li> <li>• Conducting a Governance Effectiveness exercise at Corporate Governance level and ensuring involvement of our Company members and other stakeholders.</li> <li>• Continuing the implementation of best practice, including through compliance with the Charity Commission's new Good Governance Code.</li> <li>• Developing a Board portal to ensure the highest standards of data security.</li> </ul>
<b>We will continue to review our subscriptions to promote a fair balance between growth and efficiency.</b>	<ul style="list-style-type: none"> <li>• Keeping our unit cost at around £1,700.</li> <li>• Continuing to review the balance between the core and case element of subscriptions in the context of challenging financial circumstances for higher education providers.</li> </ul>
<b>We will strengthen our approach to diversity and inclusion.</b>	<ul style="list-style-type: none"> <li>• Following internal review, implementing plans to improve our approach across a range of EDI markers, for both staff and service users.</li> <li>• Introducing a new Communications strategy that will support EDI measures, including accessibility of the Scheme.</li> </ul>



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# Operating Plan 2026

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