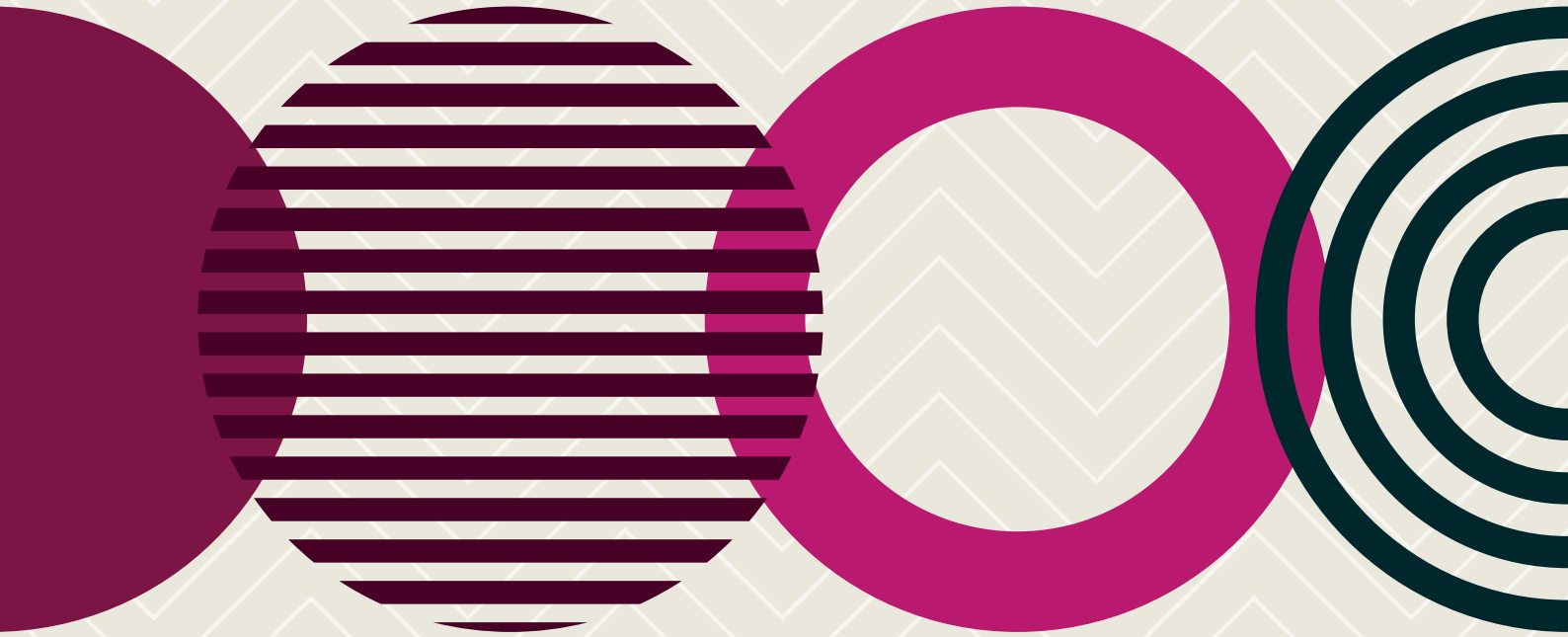




office of the
independent
adjudicator



OIA Annual Report 2025

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Foreword from the Chair

Our vision is that students are always treated fairly.

A shared commitment to fairness for students must be at the heart of a successful higher education sector that delivers for students and for our wider society. The OIA has a unique and valuable role to play in achieving this vision. In challenging times, it remains vital to keep that sense of fairness at the forefront of decision-making across higher education.

Our Annual Report for 2025 reflects the breadth and depth of our work. We handled more complaints than ever before, providing access to independent, impartial review of students' unresolved complaints. Demand rose again, with more than 4,000 complaints received for the first time, while we also increased the number of cases we resolved.

Maintaining our focus on accessibility remains a priority. In 2025 we continued to strengthen how we support students to navigate our Scheme, and we also made further improvements to the timeliness of our service, with the majority of complaints closed within six months and average case duration continuing to reduce.

We continued to work with students and their representative bodies, providers, sector organisations, governments, and other ombuds services, to share learning from complaints and contribute to effective resolution. Equality, diversity and inclusion remain vital to the OIA, and important to me, and I am pleased that we have continued to build on our work in this area.

These achievements are made possible by the commitment and skill of colleagues across the organisation, company members, and the Board. I am grateful to our staff team, jointly led by Ben Elger, Chief Executive, and Helen Megarry, Independent Adjudicator, and to my Board colleagues for their support, wisdom, and oversight throughout the year.

Taken together, this report makes a compelling case for not just how the OIA delivered its services in 2025, but why the work of the OIA is more important than ever before.

Sim Scavazza
Chair of the Board



Introduction from the Independent Adjudicator and the Chief Executive

Welcome to our Annual Report. 2025 was a year in which the importance of fair, independent, and effective redress for students was underlined once again. Higher education providers and students continued to face significant pressure. In that context, the OIA's role matters not only in resolving individual complaints but in helping to build confidence that students will be heard, treated fairly, and considered carefully when things go wrong.

Demand for our ombuds service continued to grow during 2025. We received 4,234 complaints, the first time the number has exceeded 4,000 in a single year. We resolved 3,950 complaints, more than in any previous year. At the same time, we continued to improve timeliness, with more than 90% of complaints closed within six months and average case handling time reduced to 81 days.

These are important achievements because timeliness is not separate from fairness: for students and providers alike, a complaints process works best when it is accessible, proportionate and reaches clear outcomes without unnecessary delay.

Throughout the year, we remained focused on how the Scheme operates in practice for the people who use it. That meant continuing to strengthen accessibility, supporting students through what can often be a stressful process, and making sure our decision-making remained independent, impartial, and robust. It also meant using the insight from our casework more deliberately: sharing learning with providers, students' unions, governments, regulators and sector bodies so that complaints can lead to wider improvement, not only individual resolution.



The wider context for this work is becoming more complex. Financial pressure across the higher education sector, changing expectations of regulation and consumer protection, and the evolving policy landscape in England and Wales all reinforce the need for a complaints scheme that is both trusted and fit for the future.

In 2026, we will take forward a significant programme of work to review our casework processes and to begin a comprehensive review of the Scheme itself that builds on the strong foundations outlined in this year's report but prepares us for emerging need. Our aim is clear: to ensure that the Scheme remains fair, efficient, and easy to use, while preserving the independence and quality that are central to our role.

We are very grateful to colleagues across the OIA for the care, judgment and professionalism they bring to this work every day, and to the Board for its support and oversight. The progress reflected in this report is the result of a collective effort.

As we look ahead to 2026, we do so with a strong sense of purpose; we will keep improving the service we provide to students and providers, whilst enhancing how learning from complaints can continue to contribute to a fairer higher education sector.

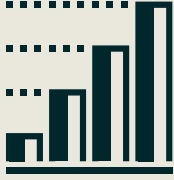


Helen Megarry
Independent Adjudicator



Ben Elger
Chief Executive

Headlines of the year

**Record complaints demand:**

the OIA received 4,234 complaints in 2025, up 17% on the previous year and the first time annual complaints have exceeded 4,000.

**Record casework output:**

the OIA resolved 3,950 complaints, the highest number in its history.

**Timeliness improved again:**

more than 90% of complaints were closed within six months, with average case handling time reduced to 81 days.

**Students are coming to the OIA sooner:**

by the second half of 2025, students were bringing complaints around three months after their Completion of Procedures Letter, down from closer to four months earlier in the year.

**Academic appeals:**

remained the biggest complaint category in 2025.

**Service issues increased:**

complaints that related to service issues rose from 30% to 33% of complaints closed, pointing to ongoing pressure in provider delivery and local complaint handling.

**One in five students received a favourable outcome:**

20% of closed complaints were Justified, Partly Justified or Settled.

**Early or premature complaints rose:**

20% of complaints were Not Eligible, up from 16% in 2024, with most brought too early before providers' internal processes had finished.

**Settlements remain a major route to resolution:**

the OIA resolved 506 cases through settlement in 2025.

**Financial redress remained significant:**

providers offered £875,933 following Recommendations and £962,979 through settlements.

**International students:**

remained overrepresented in complaints, especially in cases involving fees, refunds, deposits, attendance and visa-related issues.

**Disabled students remained a major theme in the caseload:**

42% of students complaining to the OIA disclosed a disability, and complaints involving reasonable adjustments were markedly more likely to be upheld or settled.

**Accessibility:**

stayed a clear organisational priority, with continued work to strengthen how students navigate the Scheme and use the service.

**Moving forward:**

2025 set up a major reform year ahead, with 2026 focused on reviewing casework processes and beginning a comprehensive review of the Scheme.

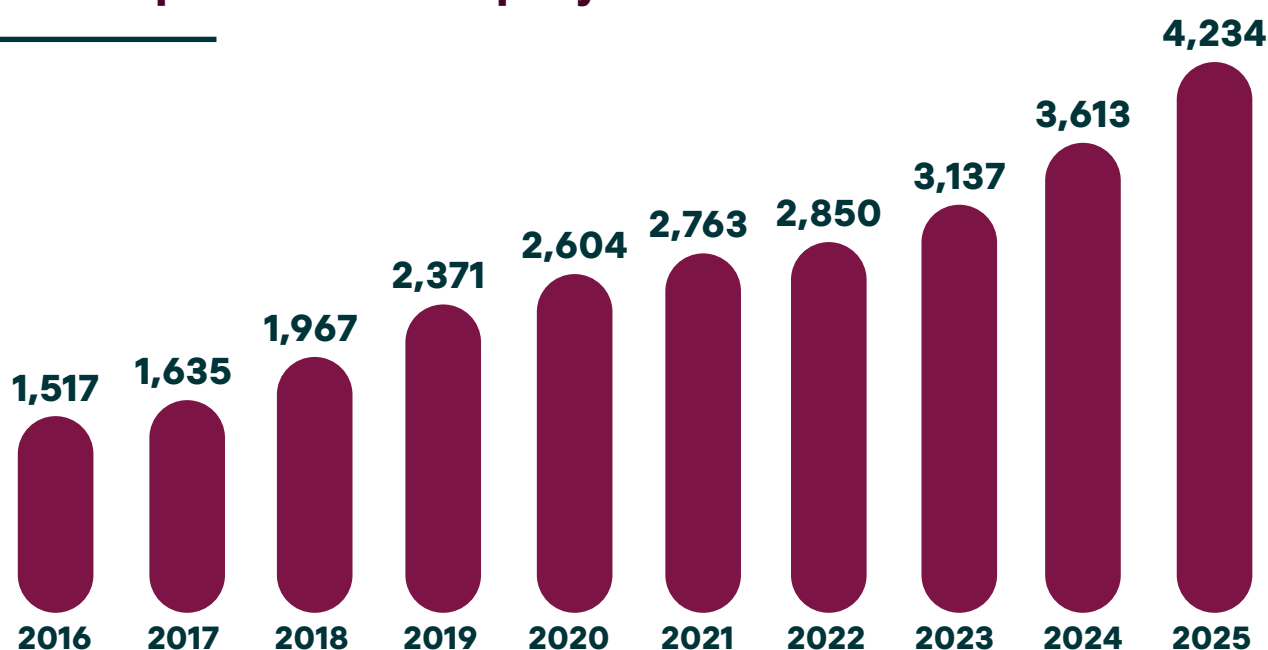
Trends in complaints

The complaints we review provide important information about the realities of student life and the diversity of the teaching and learning experience available across higher education in England and Wales. They offer us valuable insights and the opportunity for learning and improvement that goes beyond the individual experience.

Complaints are grouped into nine broad categories and we track patterns and trends that emerge, including whether issues are raised more frequently by particular student groups, or within particular types of provision.

Complaints received

Number of complaints received per year



English providers	93%	95%	93%	95%	96%	95%	96%	96%	95%	96%
Welsh providers	7%	5%	7%	5%	4%	5%	4%	4%	5%	4%

We received 4,234 in total, an increase of 17% on the previous year. This continues the rise of complaints we have seen over the last decade.

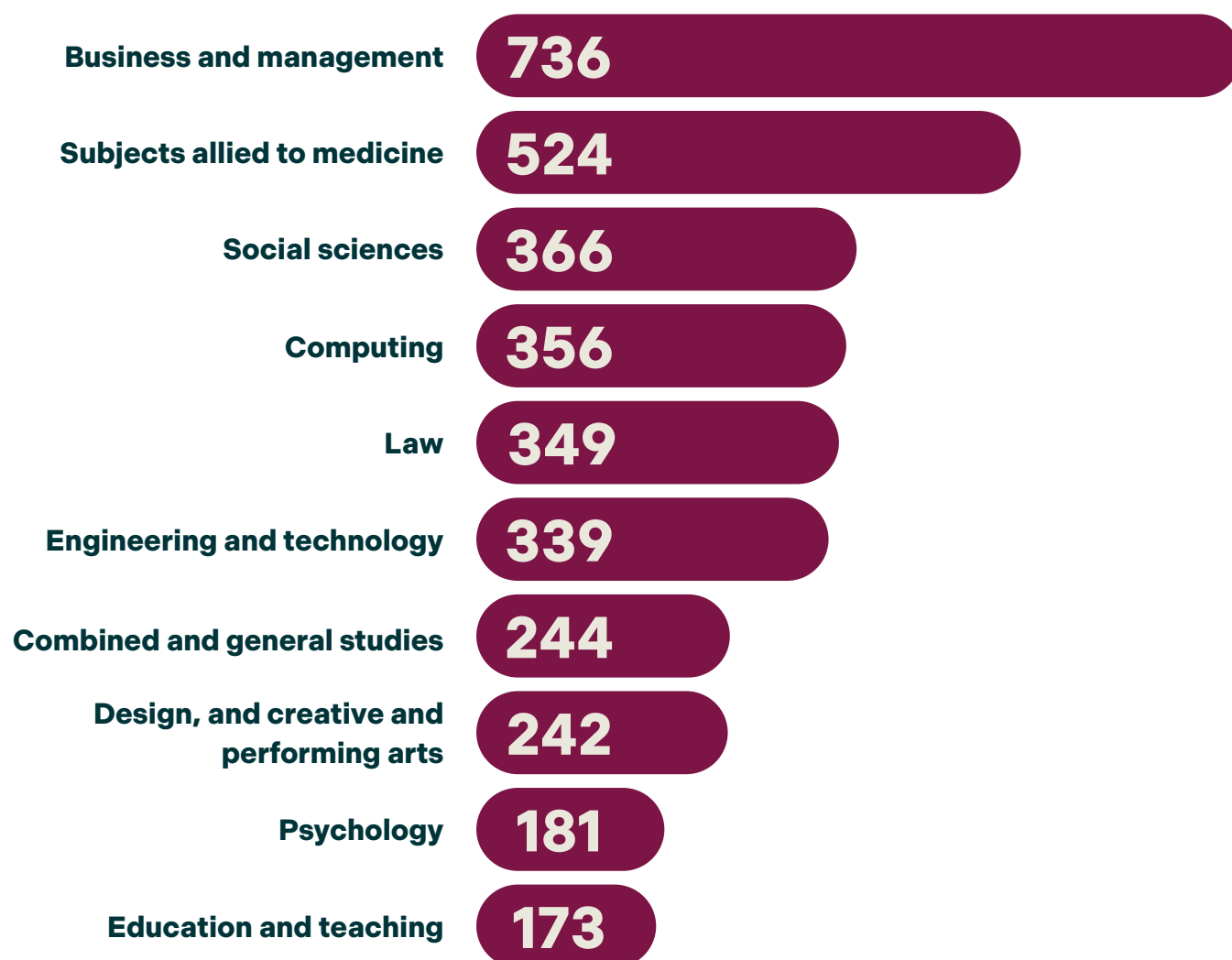
The first half of 2025 saw a small rise in receipts compared to 2024, followed by a sharp increase from July 2025 to the end of the year. October 2025 alone saw 516 complaints brought to us, the highest number in a single month in our history.

There was no clear variation in the pattern of what students were complaining about across the year to explain the significant growth in receipts from July 2025 onwards. But there was a change in how quickly students were bringing their complaint to us.

In the latter half of the year, on average students were bringing their complaint to us around three months after receiving a Completion of Procedures Letter from their provider. This was closer to four months at the start of 2025. We welcome this. When students pursue their complaint promptly it can mean that more options are open to resolve it.

The proportion of complaints received about providers in England and about providers in Wales remains consistent with previous years.

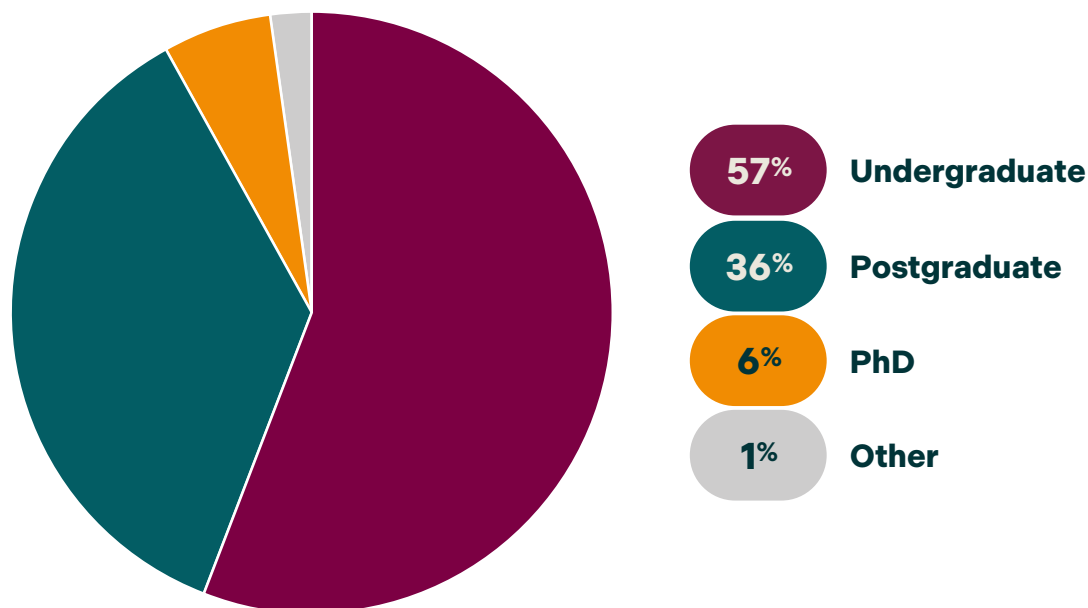
Complaints received by area of study – Top 10



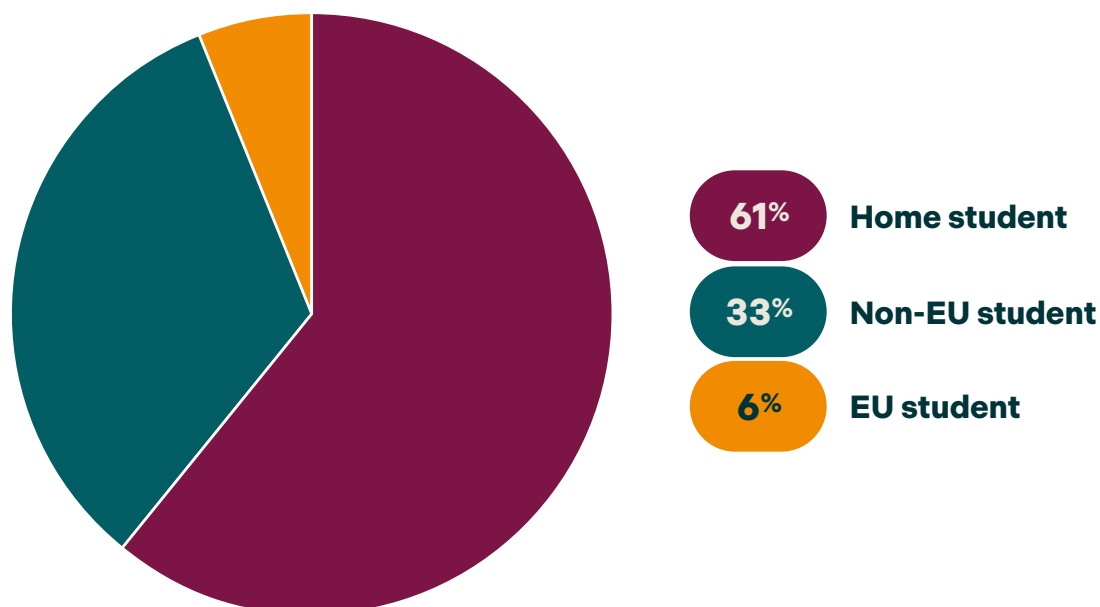
The distribution of complaints we have received from students within different fields of study is broadly in proportion to the number of students studying within those fields. Complaints from students on Business and Management courses have risen slightly, reflecting a steady growth in overall student numbers over recent years. Subjects allied to medicine saw a small decrease, which also remains broadly in line with sector numbers. Biological and Sport sciences was the most underrepresented subject area, and Law continues to be the most overrepresented subject area. This could reflect higher levels of confidence from students of Law to engage with formal processes to make complaints or appeals.

Subject-specific provision such as placements, specialist resources or the requirements for students to meet specific professional standards, can influence the type of issues students raise within complaints. For example, we saw Service issues were more common in subjects allied to Engineering and technology, and Design, creative and performing arts. Financial issues were more common in Business and Management, and Law courses.

Complaints received by level of study



Complaints received by student domicile



The breakdown of complaints by level of study and student domicile remains consistent with previous years. There has been no significant change in which students bring complaints to us. This suggests that the main causes of complaint are embedded in the ongoing operation of systems and processes, rather than reflecting the characteristics of a particular intake of students.

International students continue to be overrepresented in complaints to us. Study abroad is a significant investment, financially and personally. As well as complaints about visa issues which can only affect international students, we see more complaints from international students than home students about tuition fees, refunds and deposits. These trends cut across different course types, and are not confined to one level of study. Complaints from international students provide clear signals about where processes can break down, particularly at key transition points such as enrolment and withdrawal. Clear information, accurate advice and careful handling of fees and visas remain essential to reducing complaints in these areas.

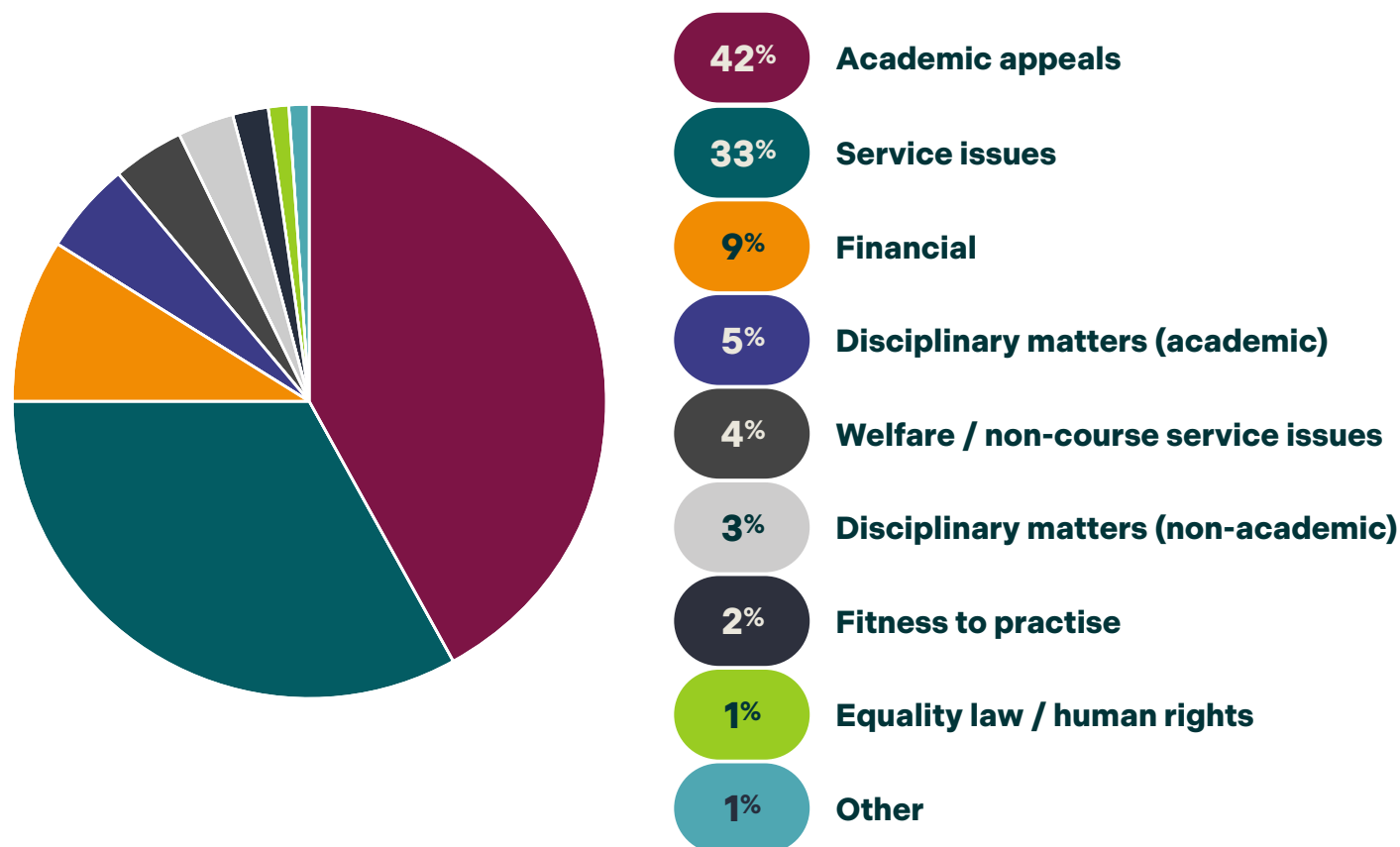
There was a small increase in complaints about Financial matters in 2025. Over half of these complaints were from international students, and many were from post-graduate students. Around a third were from students studying on Business and management courses. These patterns are likely to be driven by the high volume of international students undertaking taught Masters in these subject areas, and reflect the high fees that they pay.

We saw complaints from students who were withdrawn from their studies because they did not pay their fees. Where providers have published clear information about what fees must be paid and the deadlines for payments, it is usually reasonable for them to suspend or terminate a student's enrolment when these conditions are not met. Providers have a responsibility to manage their own financial sustainability and tuition fee income is critical to this. However, it is good practice to signpost students to sources of advice and support if they are having difficulty making payments. Our complaints show that providers will often show some flexibility for students who have engaged with them proactively when difficulties have arisen. Unfortunately, sometimes students can ignore important communications about help that is available until it is too late to benefit from it.

We continued to see evidence that providers are taking their obligations as sponsors of international students' visas seriously. We reviewed complaints from international students whose studies were terminated because of low attendance at taught sessions. Some students dispute the accuracy of attendance records; others were not sure how to tell their provider about personal circumstances that were impacting on their attendance. Even though providers' discretion may be limited by their obligations as visa sponsors, providers must still provide a route for students to challenge decisions relating to their attendance or fee payments. Providers should complete this process promptly so that any errors in the information a provider has relied upon are identified before a student's visa is curtailed.

We reviewed a small number of complaints from international students who were pursuing asylum claims and who were seeking the return of their tuition fees. A common response from providers was to invite the student to continue their studies while their claim was being processed, or to suspend their studies and hold the fees that had already been paid against a future enrolment. In the cases we reviewed, we considered these responses were reasonable.

Complaints received by category



We categorise the types of complaint we received under the nine broad headings above. Academic appeals can cover individual assessment results, resit opportunities, progression decisions, and degree classification calculations and it remains the largest category of complaints we receive. A minority of academic appeals are challenges to the academic judgment of the examiners. We cannot determine whether the mark awarded to a piece of assessed work is appropriate, but we can consider whether a fair marking process was followed and we can consider whether any feedback the student received was consistent with the published information about the learning outcomes or mark scheme. As in previous years, the majority of academic appeals relate to personal circumstances students have been affected by, which they believe have impacted on their learning and performance in assessments.

There has been a small rise in the overall proportion of complaints that relate to Service issues, from 30% in 2024 to 33% in 2025. The significant financial challenges facing the higher education sector have led to many providers making changes to their staffing levels, the structure of their teaching and assessments, or the courses that they offer. The data does not unequivocally demonstrate that such changes are responsible for the rise in complaints about Service issues. We have not seen a significant rise in the number of complaints about inadequate access to academic staff or academic expertise, about delays in feedback, or about insufficient resources for large cohorts. Students do complain about these issues, but we do not expect students themselves to identify the reasons causing any failure to deliver a service as promised. We will continue to monitor complaints for indicators of the impact of providers' financial situations.

As public awareness of the long-term impact of student loan debt grows, students and their families are more concerned about getting the maximum benefit from their time in higher education. Our conversations with students and student representative bodies tell us that students find it difficult to know what they should reasonably expect. Students can also find it hard to identify the appropriate moment to raise a concern, often giving providers the benefit of the doubt and hope that an issue will resolve itself positively without the need for formal action. Sometimes this means that providers are unaware that a problem exists. Therefore, it is essential that providers ensure accessible routes for students to raise concerns before they escalate into big problems.

Most complaints are raised by individual students but where students share a common cause for concern they can complain as a group. In 2025, we received 17 group complaints, from a total of just over 200 students. None of the groups were large enough to trigger the use of our large group complaints process. Almost every group complaint fell within the Service issues category.



Case Summary 1

Group complaint

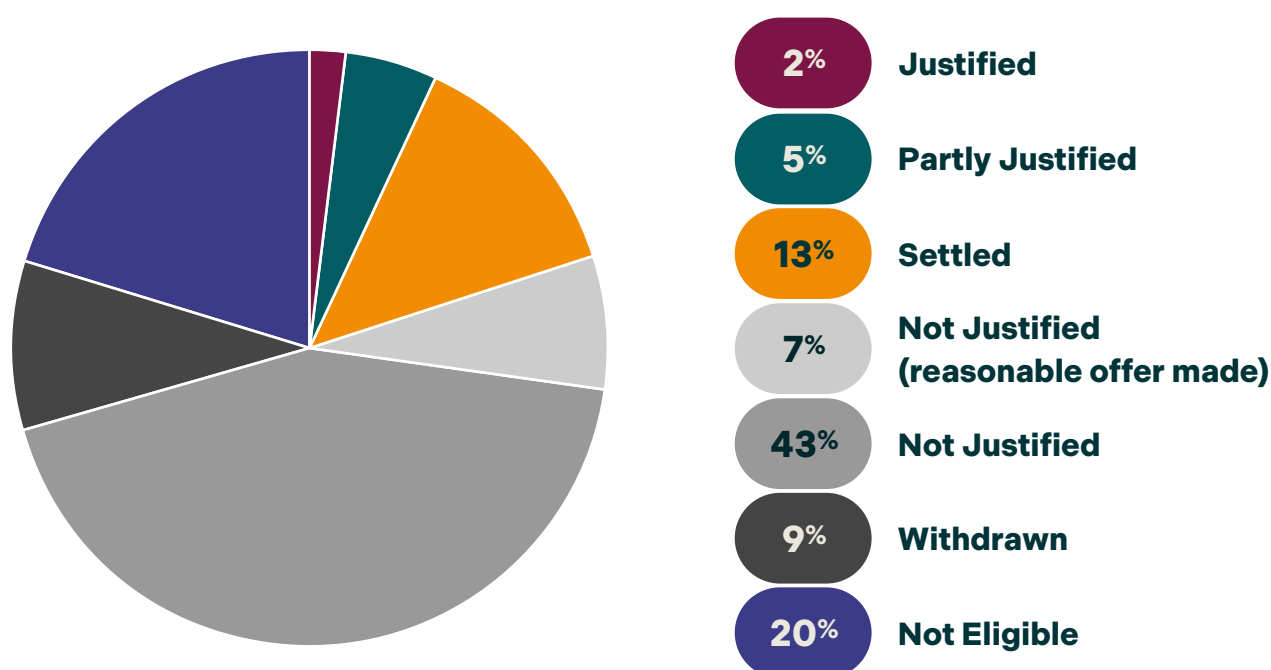
A group of 20 postgraduate students on a professional healthcare course complained that they had missed out on learning opportunities promised in the course prospectus. They had expected 10% of the course to include practical dissection. This part of the course was suspended because potentially dangerous levels of a chemical had been detected in the laboratory, above the safe workplace limit. The group was also concerned that they may have been exposed to potentially harmful levels of the chemical prior to the laboratory being closed. They said there had been inadequate health and safety management. The provider initially upheld the complaint in part and offered £1,000 for distress and inconvenience and £150 for the delay in resolving the matter.

The students brought the complaint to us, as a group. It became clear in the early stages of our process that some relevant evidence had not been considered as part of the complaint. The provider re-ran its review of the complaint and upheld it. It accepted that there had been a procedural irregularity, that there was new evidence which cast doubt on the original decision, and that its previous decision had been unreasonable. The provider apologised and offered £5,000 in compensation for distress and inconvenience, later increased to £6,000. It also outlined a number of opportunities for improvements it had identified as a result of the complaint.

18 of the students remained dissatisfied and returned to complain to us. We reviewed the complaint and partly upheld it (we decided it was **Partly Justified**). We were satisfied that the offer provided an adequate remedy for the parts of the complaint that the provider had upheld. But the provider did not have sufficient risk monitoring and mitigation in place. Although there was no evidence to prove that the group had been exposed to unsafe levels of the chemical, we accepted that the students were very concerned about this. We recommended that the provider increase its offer to £8,000 to recognise the distress and inconvenience caused by the uncertainty regarding the level of risk exposure experienced by the group members.

Complaints closed

Complaints closed by outcome



In terms of outcomes the overall picture is broadly similar to 2024. 20% of students received a favourable outcome, either because their complaint was upheld in full or in part or Settled.

In a further 7% of cases, the provider made an offer to the student, which we record as “Not Justified (Reasonable Offer Made)”. This outcome reflects our view that the student had raised a complaint that had some merit, and the provider had offered a remedy, either before the complaint came to us or during our review, that we considered to be a fair outcome. In these cases, the provider’s offer has remained open until the end of our review. Some involved remaking offers of financial compensation amounts to students ranging from £100 to £8,250 as well as partial tuition fee refunds. In other cases, the offer included practical actions, including remarking work or reconsidering a student’s academic profile.

Settlements have fallen slightly from 15% in 2024 to 13% in 2025. We have also seen a reduction in the value of financial settlements offered by providers to settle complaints in comparison to 2024. This may in part reflect financial constraints and a more cautious approach to making offers, or it is also possible that the issues that have occurred may have had less impact on the student. Not all resolutions are financial. In many cases practical steps to correct an error, or giving a more detailed explanation can successfully resolve a complaint.

The reduction in settlements has not been accompanied by an increase in Justified or Partly Justified outcomes. The proportion of complaints we uphold, in full or in part, remains stable. Taken together, this suggests that whilst providers may be more restrained in offering financial settlements, there is no evidence of a decline in the overall quality of decision-making during a providers' internal procedures.

Early resolution remains an important focus for us. Continuing through a full review places resource demands on both providers and students. We try to identify opportunities for resolution as soon as a complaint is received, including being clear to students when their complaint is not well founded or the outcome they are seeking is unrealistic.

The proportion of complaints that were Not Eligible for review has increased from 16% in 2024 to 20% in 2025. Of these, 70% were brought to us too early, because the student had not completed the provider's internal procedures. Although some students approach us before engaging with their provider's internal procedures, most of the complaints raised with us prematurely are brought by students who have begun the process but feel that they have waited too long for a decision. Delays are a symptom of a system under strain and may be one impact of the financial challenges facing providers. The level of Not Eligible complaints is now comparable to the levels we saw between 2020 and 2022, when providers were most impacted by the Covid 19 pandemic.

The distribution of complaint outcomes varies by complaint categories. Not Justified decisions remain more common in academic appeals (68%) and academic disciplinary (61%) complaints, consistent with previous years. Although individual students' circumstances differ, providers often have well established principles and processes to follow that result in decisions that are fair.

We hear from our engagement with the sector that grappling with generative AI challenges remains a focus for many providers, but it has not been an area of rapid growth within our casework.

Complaints relating to service issues continues to present a different profile. Where academic appeals often follow a common pattern, the breadth of issues that a student may raise as a complaint means there is wide variety in the kind of evidence a provider may need to gather and evaluate. This can lead to delay in responding to a student's concerns at the formal stage. Even where a provider has a well-resourced centralised complaints team, delays can arise when gathering information from the department where the issue first arose.

When making difficult decisions about allocation of resources, it is important that providers continue to take account of the capacity that is needed at a local level to respond to complaints. A failure to respond to complaints promptly at the earliest opportunity will result in increased demand for formal processes and in the need to compensate students for delay.



"This is the best news ever! Thank you for this update and for your work on my case, as well as your detailed explanation. Yes, I am willing to accept the offer. Thanks again and I really appreciate your help."

From a student following settlement offer

Themes in complaints

Last year, we highlighted three main themes: complaints from students at the end of an academic appeal process, complaints from disabled students, and complaints about bullying, harassment and sexual misconduct.

These themes remained prominent in our casework across 2025. Academic appeals continue to make up most of the cases we review. A significant proportion of complaints across all complaint categories are brought to us by disabled students. We also continue to uphold a high proportion of the complaints we review involving harassment and sexual misconduct. We explore these areas in more depth in the rest of this section.

Complaints about academic appeals

Academic appeals continue to form a significant proportion of our complaints. As in previous years, these complaints are about decisions about assessment outcomes, final awards, or whether a student can continue on their course.

In more than two-thirds of the academic appeal complaints in 2025, students raised a personal circumstance which they said had impacted on their ability to engage with their learning or perform well in assessments.

It is also common for students to raise other concerns alongside their personal circumstances, for example, raising complaints about the quality of their teaching, supervision or feedback or broader concerns about pastoral support. Providers often exclude these matters from academic appeals processes and direct students to separate complaints processes. This is usually appropriate when the complaint is complex or wide ranging. Sometimes providers will consider a student's concerns within an appeals process. This can be a pragmatic and proportionate way to respond.



Case Summary 2

Academic appeals

A student appealed their final award outcome on the basis that the supervision they received when undertaking their dissertation was inadequate. The student said the supervision didn't provide clear guidance and this meant they couldn't work on the dissertation as quickly as they had wanted to, so the final work was rushed. They also said that the final dissertation project was unfairly marked, didn't include enough feedback or recognition of strengths.

The provider noted that the student could have raised their concerns at the time they were being supervised. It still looked into the supervision and found no evidence that it was unsatisfactory. It decided that the student's appeal was essentially a disagreement with the supervisor's input and with the academic judgment of the examiners. It rejected the student's appeal.

The student then complained to us. We did not uphold the student's complaint (we decided it was **Not Justified**). We agreed that if the student had concerns about their supervision, they could have raised them at the time. The student said to us that they were worried about making a complaint given the power imbalance between themselves and their supervisor. We did not consider this to be a good reason to delay raising concerns in this case. By not raising their concerns before submitting their work, the student did not give the provider the chance to investigate and if necessary, put things right.

In our review we saw that the provider had clearly set out what supervisors were expected to do. It was not the role of the supervisor to comment on every aspect of the student's work designed to assess individual learning and understanding. From what we saw, the feedback provided was consistent with the mechanisms in place. The supervisor's emails were framed in a constructive way and had been timely. Some of the delays in the email exchanges had been caused by the student.

We also saw evidence to show that the dissertation was marked in accordance with the provider's marking and moderation processes, with sufficient reasoning given by markers to explain why the dissertation achieved the mark it did.

This year's casework shows continuing pressure on systems for considering personal circumstances. In the last five years we have seen many providers operate processes that are more flexible than previously. Typically, this includes a certain amount of latitude on deadlines for submitting assessed work and allowing a certain amount of absence or late submission without the need for independent supporting evidence. Providers tell us that this is intended to be more inclusive by design, and more reflective of practice in employment where an element of self-certification for minor illness is common.

Despite this, providers tell us they continue to see very high volumes of claims for additional consideration of personal circumstances and this feeds through into the complaints we see. Providers have frameworks that are designed to ensure fairness and consistency for all students, but these operate most effectively when issues are raised in advance rather than retrospectively. A consistent pattern is that students do not engage with processes to notify their provider that they are experiencing some difficulty at the point when they are intended to operate. When students do not engage with the relevant processes at the appropriate time, providers are limited in how they can take the student's circumstances into account. The consequences for individual students can be significant particularly where late engagement results in missed opportunity for support or adjustment.

This creates a recurring tension. Providers need to apply their regulations consistently, particularly where decisions affect progression or award outcomes. Students, however, may experience these decisions as lacking compassion. Students who complain to us are often confused about why the provider has focused on their reasons for not seeking help at the relevant time, because they expected the provider to focus on the severity of the impact of their circumstances.



"I took my case to the Office of the Independent Adjudicator. They listened. They asked [the University] to re-mark my dissertation. Today, I received a corrected transcript. The 57 has become a 72: First Class."

A student on LinkedIn talks about what happened after we looked at their complaint, following the marking and assessment boycott

Case Summary 3

Academic appeals

A final-year student was attempting a module for the second time. They were struggling to complete coursework for the module, so they applied for a one-week extension. The extension was given but the student's work did not subsequently achieve a pass. The student had to complete an additional assessment before they received their final award. This meant that they would not be able to graduate immediately.

The student appealed on the basis that they had circumstances affecting their performance which they couldn't have raised earlier. They said that at the time of the coursework they were in such a mentally stressed state that they couldn't properly assess or understand their situation. As evidence, they submitted emails with the provider's Disability Service which told them how to submit a request for additional consideration or request an extension. The student also shared the results of an ADHD self-evaluation test. It said the scores were consistent with ADHD in adults. The student explained that they had not shared this earlier because they didn't think it was strong enough evidence. They were trying to get a formal assessment, which could take several months.

The provider rejected the appeal because the student had not given a good enough reason to explain why they had not asked for a longer extension or for additional consideration at the right time. The provider pointed out that it had issued specific guidance for students about what to do if they are awaiting a diagnosis. For example, they could submit a request for additional consideration claim with correspondence from their support services or submit a claim and explain they needed longer to provide the evidence.

The student complained to us. They said again that they didn't think they could apply for a request for additional consideration or a longer extension because they didn't have any official supporting documents. They did not realise until much later that they needed more time to complete their extension work and they wanted to graduate with their friends. The student also told us that they had since received a formal ADHD diagnosis.

We did not uphold the student's complaint (we decided it was **Not Justified**). We could see that the student had circumstances that were affecting them at the time they were completing the coursework. But the student did not have evidence to support their claim that their mental health was such that they were unable to submit a request for additional consideration circumstances claim or longer extension at the time. The provider had given the student clear information about making a claim which explained what to do.

The complaint was brought to us one year after the provider's final decision. Because of this delay, even if we upheld the complaint, we could not have recommended anything that would have enabled the student to graduate with their peers.

The complaints we receive reveal a system that is resource intensive for providers and not always well understood by students. While providers are making efforts to increase accessibility and flexibility, the volume of cases and the nature of the complaints suggest that the current approach is not working as effectively as intended. Overall, this points to a process under strain: one that is fair on paper, and appropriately publicised in provider's student-facing materials, but does not consistently resolve issues at the point they arise, leading instead to challenges through the academic appeal stages.

We continue to encourage providers, working with their Student Representative Body where possible, to ensure that all students understand how and when to seek support if they do not feel able to perform at their best in an assessment. It is particularly important to ensure that international students understand this process, which may be different to processes that have operated in their previous study elsewhere.

International students are slightly over-represented in the academic appeal complaints we review. Almost two-thirds of the academic appeals that were about a student not meeting attendance or engagement requirements came from international students. We cannot comment on whether international students were less likely to attend teaching than home students. Our interpretation is that these cases demonstrate providers are quick to act to ensure compliance with their responsibilities as international visa sponsors.

Our casework often highlights the importance of providing clear, accurate and timely information to students.



"... I want to extend my heartfelt thanks to you and the entire OIA team for taking up my complaint and resolving it so swiftly. After waiting for three years, I am overjoyed that my issue was resolved in just a few weeks with your involvement. Your dedication and efficiency are truly commendable."

Student feedback following early resolution

Case Summary 4

Academic appeals

A student enrolled to study on a Graduate Diploma in Law with a pre-sessional module attached. The student submitted their pre-sessional assessment after the standard deadline, but within the permitted late submission window. This resulted in the mark being capped at pass.

The student appealed the decision to cap the mark. They said that they were not made aware of the pre-sessional module until shortly before it began and only through finding information about it on the provider's virtual learning environment (accessible to enrolled students). Other communications, including the letter offering the student a place, indicated that the course would start at a later date. The student said that their existing study and work commitments meant that they could not engage from the start and they had struggled to meet the deadline. They said if they had known about the pre-sessional module sooner, they would have amended their schedule so they could work towards it or apply for a course elsewhere. The student had also believed that the assessment would not receive an actual mark but would just be recorded as either a pass or a fail, and on that basis did not submit a request for additional consideration.

The provider rejected the appeal. Although it accepted there was a miscommunication with the start date of the module, it was satisfied that the student was still able to meet the learning outcomes. It also decided that there was insufficient evidence to show the student had been told the module was a pass/fail module, rather than numerically graded. The cap remained in place.

The student complained to us. We upheld the complaint (we decided it was **Justified**). The provider was unable to demonstrate that it had given clear, accurate and timely information about the requirement to attend the pre-sessional module, the start date or how the assessment would be marked. We thought it was reasonable for the student to think that the start date was later than it was. The lack of clarity around whether the assessment was a pass or fail affected the student's ability to make informed decisions including whether to submit a request for an extension or additional consideration. This amounted to a procedural irregularity and contributed to the student's late submission. We did not consider it was reasonable for the provider to apply the late penalty or reject the academic appeal in these circumstances.

We recommended that the provider remove the cap applied to the late submission, so the original mark would stand. We also recommended that the provider review the information it gives to prospective students on its website, within its offer letters and other pre-enrolment materials.

Complaints from disabled students

The proportion of complaints brought to us by disabled students continues to rise, although the rise between 2024 and 2025 was less significant than in the two previous years. In 2025, 42% of students disclosed a disability. It is possible that some of the students who identify themselves as disabled when complaining to us may not meet the strict legal definition that would be necessary to establish a claim for support via the Disabled Students Allowance (DSA). However, it is also possible that some students may choose not to identify themselves as disabled or share that information with us if they do not see its relevance to our processes.

Providers tell us that the proportion of students identifying themselves as disabled is rising, and this is reflected in our casework. Some describe a significant increase in students seeking support, particularly in relation to neurodivergence, anxiety and other mental health conditions as well as individual needs becoming more complex, placing pressure on provider processes and resources that were put in place when demand was lower. Greater numbers of students seeking support may reflect better awareness among students about the options that may be available, or increased confidence that sharing this information will not result in any form of discrimination. In some circumstances, it may also reflect the profile of particular courses, provider or recruitment practices. Even so, the figure of 42% still suggests that disabled students are overrepresented in the complaints we receive and that disabled students continue to face barriers that make complaints more likely.

The distribution of complaints from disabled students in 2025 denotes some areas of concern. In particular, 65% of the complaints we reviewed from students who had experienced a procedure to assess whether they would be fit to practise in a particular regulated profession upon completion of their course were from disabled students. Placements within a professional setting can be challenging for all students. Providers must be clear with disabled students in advance about the support and reasonable adjustments that can be put in place, and give accurate information about whether there are adjustments that will not be reasonable because they will interfere with the student demonstrating a specific professional competence. There should be clear processes setting out who will share information about the support a student may need, and when. Some of the complaints we have seen have shown the impact of poor communication. In other cases, a placement provider decided they were unable to provide the appropriate level of support and supervision.

From our data, we can say that higher education providers typically do not have effective mechanisms in place to ensure the provision of a level of support within a placement setting, that has been agreed upon in advance, meets the needs of all students needing it.

It is also important that providers consider making reasonable adjustments to the processes used to explore whether a student will be able to meet the competence standards of a particular profession.

Case Summary 5

Disabled students

A student on a professionally regulated healthcare course needed to undergo a background check before beginning any placements. The Disclosure and Barring Service (DBS) check revealed that the student had a criminal conviction. The student had not previously told the provider about it when they had been asked to share information about any convictions.

After an initial conversation with the student, the provider held a Fitness to Practise hearing. The student explained that they were affected by memory loss connected to an ongoing health condition. The panel decided that the student's written statements and statements in person were not consistent and it terminated the student's studies.

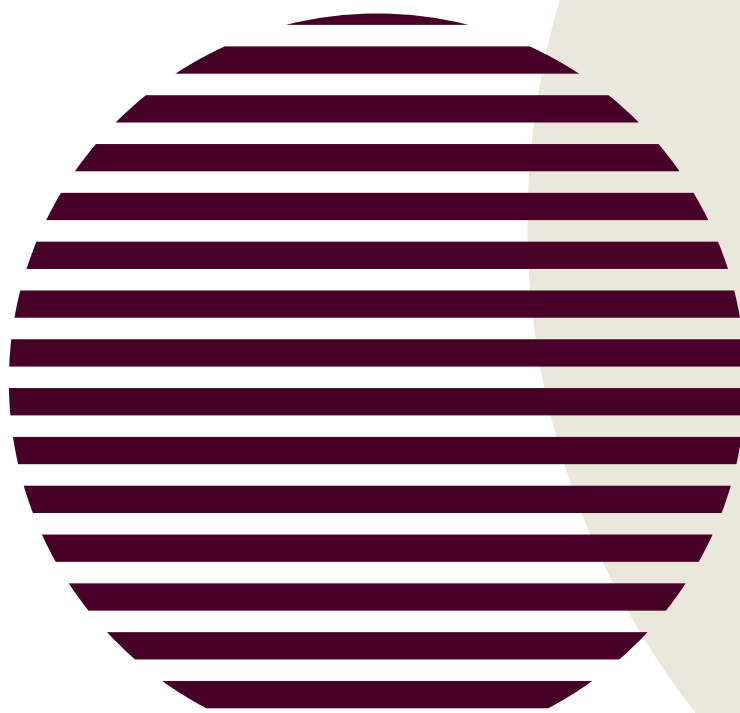
The student appealed and the provider rejected the appeal. The student complained to us.

We expressed concerns that the provider had not adequately taken account of the student's known disabilities in making the decision to terminate. The student's support plan set out that they had difficulties with concentration, retaining and processing information, anxiety, communication and social interactions. There was no record of how the panel had considered these factors when thinking about the consistency of the student's statements and how they had behaved at the panel. We were also concerned that the panel had not documented its reasons for rejecting other options available to it under the Fitness to Practise procedures.

The provider acknowledged these concerns and offered to reconsider the matter at a new Fitness to Practise Panel and pay the student some compensation for the distress and inconvenience caused. The student rejected this offer because they wanted to return to the course without another panel hearing.

We decided that the provider's offer was reasonable, and so recorded the outcome of this complaint as **Not Justified (Reasonable offer made)**. Given the professional standards requirements that apply to the course, the provider could not ignore the information that was now known about the student's previous conviction, but it needed to consider it in a way that was fair.

In 2025, there was a small but noticeable difference in outcomes for disabled students. Complaints from disabled students were slightly more likely to be upheld by us. We rarely come across a complete absence of appropriate policies or processes. Issues arise in the practical operation of the processes, whether staff understood what was required, and whether the provider could show that it had properly considered the student's individual circumstances. We continue to see cases where support that has been agreed is not implemented properly, where communication is unclear, or where responsibility for putting support in place is not sufficiently well understood. Small failures in process can have a significant impact where a student is relying on agreed adjustments in order to participate on an equal footing. Although it is usually reasonable to expect students to raise concerns if something is not working, some proactive monitoring by the provider about whether adjustments and support mechanisms are being delivered can remove some of the additional burden placed on disabled students.



Case Summary 6

Disabled students

Students had to submit two pieces of assessed work for a particular module. The first piece did not contribute to the overall grade students would achieve for the module. Students would receive feedback on it and the data within it could be used as the basis for the second piece of work.

A disabled student had a support plan in place that permitted extra time to submit all their coursework. But eight days before the extended deadline expired, the module tutor said to all students that the opportunity to submit the work was now closed. Although the student submitted their work within the extended deadline as planned, it was not marked and was recorded as a fail/non-submission.

The student complained about the change to the submission date. They also raised concerns about the module tutor's communication with them more broadly.

The provider upheld the complaint about the change of submission date. It confirmed to the student that this had not affected their overall module mark. It rejected the other aspects of the student's complaint. The student was dissatisfied and complained to us.

We upheld some parts of the complaint (we decided that it was **Partly Justified**). We criticised the provider's response to the complaint. Its records of its investigations were limited, and the initial response to the student was limited to a few lines that did not explain how it had reached its conclusions. By changing the submission deadline at short notice the provider had placed the disabled student at a disadvantage. The student had been deprived of the opportunity for feedback. It was distressing for the student to have a "fail/non-submission" recorded when they had completed the work. The provider had not offered any remedy for this, nor apologised for other comments made by the module tutor about the student needing to better manage their time.

We decided that it was reasonable for the provider to reject other aspects of the student's complaint. The evidence showed that usually the module leader's interactions with the student had been timely, courteous and supportive.

We recommended that the provider offer the student an apology and £500 compensation for the distress they had experienced. We also recommended that the provider contact all staff who set submission deadlines to remind them of the importance of proactively mitigating the impact on disabled students if making changes at short notice is unavoidable.

Failure to provide reasonable adjustments remains a prominent issue within the cases we see, featuring in 20% of Justified cases and 23% of Partly Justified cases we reviewed from disabled students. Where reasonable adjustments were raised, complaints were almost three times as likely to be upheld or settled overall. Delays are also a common feature in complaints about reasonable adjustments, being referenced in around a third of these cases compared to around a fifth of all complaints. This suggests that the difficulty is not simply whether support is available in principle, but whether it is delivered clearly, consistently and at the right time.

Case Summary 7

Disabled students

A student shared with the provider that they have autism, ADHD and generalised anxiety disorder. A support plan was put in place to ensure that the student was not placed at a disadvantage by the provider. This included a requirement for instructions to be clear and unambiguous.

After an assessment, the student received a copy of their work including the marker's written comments. The student was concerned because the marker had said that their answer for question 2 drew on the same example as they had used in response to question 1. There were no marks recorded next to questions 2a and 2b, only against question 2c. The student believed that the marker had unfairly refused to mark questions 2a and 2b because they had used the same example when answering different questions. The student raised their concerns with the provider. The provider confirmed that the mark awarded was appropriate. It acknowledged that in future versions of the assessment it should explicitly state that students should use different examples in their answers to the questions.

The student complained to us. We upheld some parts of the complaint (we decided that it was **Partly Justified**). We were not able to comment on whether the mark awarded for question 2 was appropriate. We could infer that the mark awarded for question 2 did include sections 2a and 2b as well as 2c, because the mark written at the end of question 2 was higher than the marks available just for section 2c. But we did not think that the provider had given feedback to the student that was clear and unambiguous.

We recommended that the provider should apologise to the student for the lack of clarity in the assessment instructions and in the feedback it had given. We also recommended that the provider should offer the student additional feedback about how the mark for question 2 had been reached.

Our casework shows that disabled students raise concerns across the full range of complaint categories. Around 11% of the academic appeals we see refer to disability support. Disabled students raise more concerns relating to welfare and non-course service issues than non-disabled students do. Most of our casework relating to equality law and human rights comes from students who disclose a disability. Disabled students' experiences of disadvantage are often shaped by the wider student experience and by how effectively different parts of a provider work together.

Providers have told us that resourcing pressures are affecting disability support in several ways including reduced capacity in specialist teams, difficulties securing note-takers and other support, and inconsistency in the quality and continuity of provision funded via the DSA. Some are responding by centralising elements of support planning or introducing more standardised approaches, which may improve consistency but can risk being less responsive to individual circumstances. Providers also tell us that some students arrive in higher education with expectations shaped by their experience in school or further education, where support may have been more intensive or more closely coordinated. This makes it all the more important that policies and processes are clear, accessible and easy to use. We continue to hear concerns that some policies are too complex, outdated or difficult to navigate, and that internal ownership of procedures is not always clear.

Alongside these concerns, many providers describe continuing to work towards more inclusive approaches, including recording lectures, using more flexible assessment formats and moving away from traditional examination modes in some areas. But our casework suggests that inclusive practice is not yet sufficiently embedded to prevent a higher volume of complaints from disabled students, particularly where staff are uncertain about more complex adjustments or unsure if flexibility is possible within academic or professional standards.



"I wanted to say how much I appreciate the time and care you've taken with my case. Your communication has been so clear and considerate throughout, and I'm really grateful for the way you've handled everything."

A student during our review process

Harassment and Sexual Misconduct

Although the number of complaints about harassment and sexual misconduct we have reviewed has risen, as a proportion of our overall caseload the level is relatively consistent with recent years and remains just above 5%.

We review complaints from students who are dissatisfied with how a provider has responded when they have told the provider about experiencing harassment or sexual misconduct. Most commonly students have complained about the conduct of another student, but some complaints relate to staff behaviour. In 2025 the complaints we reviewed about staff behaviour rarely involved physical contact and were more likely to relate to how staff in academic and residential settings spoke to students or provided feedback on their work. We occasionally also hear from students who have been disappointed when seeking support from their provider because of the behaviour of individuals from outside the provider's community.

The complaints we have reviewed from reporting students highlight the importance of prompt action by providers to ensure that students feel safe. It is important to provide students with accurate information about what is taking place – even when that may not be what the reporting student would prefer.



Case Summary 8

Harassment and sexual misconduct

A student (student A) made an online report about bullying and sexual harassment by another student (student B). Student A and student B were living in the same student flat. At student A's request, the provider arranged for student A to move to alternative accommodation.

Student A was supported by a designated liaison officer. A separate investigator was appointed under the provider's disciplinary process and they met with both students. The provider told student A that it was using an informal process to resolve the complaint. It put in place an agreement with student B not to contact student A.

Student A contacted the liaison officer to express dissatisfaction with this outcome. Student A still felt unsafe and wanted the provider to take a more formal approach. The student liaison officer wrote to student A explaining why they believed the informal approach was appropriate. Student A requested a review of this decision. Student A also complained that the liaison officer had told them that student B would be away from the campus until after student A's studies were complete, but this was not correct. In its response the provider explained that it thought student A had been content to proceed to an informal resolution and suggested that student A's communications had not been clear. It concluded that it had followed its processes appropriately. It said that it had no knowledge of student B's return to campus.

Student A complained to us and we upheld some parts of the complaint (we decided it was **Partly Justified**). The provider had acted quickly to manage contact between the students and it had been proactive in considering the impact on student A's academic performance. But it was inconsistent in the information it made available to students about informal resolution. One document said that informal resolution would only be attempted with the agreement of the students involved, but another document said that the investigator would decide which route was appropriate. It was not necessary or helpful to suggest that student A had not been clear in expressing their preferred outcome; in fact there had been a failure of communication between the liaison officer and the investigator about student A's perspectives. We also considered that the provider should have taken more care to confirm student B's whereabouts before sharing information which turned out to be inaccurate.

Student A had waited 11 months before submitting their complaint to us. In the meantime, they had raised further complaints about student B, and had also successfully completed their studies. It was therefore not appropriate for us to recommend that the provider now take a more formal approach to their initial concerns. We recommended that the provider offer the student an apology and compensation of £2,000. And that it should review its policies to remove inconsistencies, provide additional clarity about the role of the liaison officer and train staff in providing suitably detailed reasons for the decisions made under its policies.

Case Summary 9

Harassment and sexual misconduct

A student (student A) made an online report to the provider describing a sexual assault by another student (student B). Three months later student A saw a caseworker to discuss the report in more detail and confirmed that they wanted the provider to take action to investigate the report. The caseworker told student A it was likely that student B's conduct would be considered by a disciplinary panel. After another four months student A asked about progress. The caseworker had taken a leave of absence and no action had been taken.

The provider began an investigation, and a second caseworker met with student A several times to gather information. Student A was informed that the casework team were finding it difficult to decide if there had been a breach of its disciplinary rules, and so the casework team had decided there was not enough evidence to put the case before a disciplinary panel. It informed student A of this decision by email.

Student A made a complaint about how the provider had responded to their report, drawing attention to the delays and the lack of care displayed in sending an important decision on a sensitive topic by email. Student A also complained that the caseworkers who had taken their statements lacked the skills to provide support as they recounted traumatic events. Student A was concerned that they had not been given any opportunity to understand what student B's response had been, or to respond to any questions the caseworkers might have had for student A as a result of student B's statement.

The provider upheld some elements of the complaint. It apologised for the delays and for the way it had communicated about what would happen. It also offered some financial compensation for the distress this had caused. But it concluded that the mistakes in its handling would not have affected its decision not to proceed with a disciplinary hearing.

Student A complained to us. The focus of our review was how the provider had treated student A after they had made the report. We explored whether the provider was willing to settle the complaint; it declined.

We upheld the complaint (we decided it was **Justified**). The provider had not given a coherent and consistent explanation to student A as to why the evidence they had provided, in the form of personal testimony, messages from student B and photographs of injuries, was not sufficient to continue with the processes under its disciplinary regulations. It had required the student to repeat their testimony and had made comments about the student's memory and the consistency of their report. This was not an approach that was trauma-informed, nor centred on the welfare of the reporting student.

We recommended that the provider should apologise again to student A and pay compensation of £3,750 in recognition of the distress caused by the way it had responded to their report. We also recommended it should review its procedures. The provider had confirmed that it had already undertaken a significant programme of training and had created new posts with specific expertise in supporting people who have experienced sexual violence.

We also review complaints from students who have been subject to a disciplinary process intended to establish whether the student had breached the provider's expected standards of behaviour. These students often feel that actions that have been taken to manage risks of further harm before the full disciplinary investigation process has taken place are disproportionate or unfair. Providers can find it challenging to balance the management of risk with being supportive to all parties involved. Students can be concerned about why a particular action was taken in response to one incident, but not in another. We think if providers consistently apply the principles that guide a fair process, it can still be reasonable for similar incidents to result in differing outcomes. This reflects the significant variety in the individual circumstances that might lead to a report of misconduct. Providers should consider a range of precautionary measures, beginning with those that are least disruptive to a reported student's studies, and evaluate how effective the measure is likely to be in managing risk and protecting the wellbeing of all parties. It is essential to document the reasons for the decision and the factors that have been taken into account. It is also important to keep the measures under regular review.



Case Summary 10

Harassment and sexual misconduct

A student reported receiving a number of hostile messages via social media and directly to their mobile phone, which they felt was bullying and harassment. It was clear from the content of the messages that they were written by someone with knowledge of the interactions between students and staff on a particular module. The messages expressed views supporting the physical harm of certain groups of people and caused the recipient significant distress.

The provider carried out a disciplinary investigation. It invited a number of students to attend individual investigation meetings on the basis that they might have knowledge of or be involved in sending the messages. The students were able to send additional information to the investigator after the meeting and they were provided with a copy of the note of the meeting and were able to make comments on this record.

The provider concluded that bullying and harassment had occurred, but it was not able to establish, on the balance of probabilities, that any specific student was responsible for sending the messages. It confirmed that no disciplinary findings had been made. It put in place non-contact arrangements between the reporting student and other students.

The students submitted individual and collective responses to this outcome, on the basis that the non-contact arrangement implied that the students were guilty of an offence; that it was not reasonable for the provider to conclude that bullying had occurred if it could not prove who was responsible; and that the process had been unfair and caused distress.

The provider considered these submissions as an appeal against a disciplinary outcome. It reiterated that it had not concluded that any individual student had breached its disciplinary rules. It said that the non-contact arrangement was not punitive and was protective and preventative, intended to minimise future distress for all parties.

Several of the students made individual complaints to us. We did not uphold the complaints (we decided they were **Not Justified**). The messages that were reported to the provider were such that it was appropriate for the provider to consider them under its disciplinary processes. We were satisfied that the provider carried out a fair process and offered support to the students it was investigating as well as to the recipient of the messages. It was reasonable for it to conclude that it could not establish the source of the messages. It was a reasonable and proportionate response to try to manage contact between the students moving forward. We were not persuaded that the arrangements were either punitive or had a negative impact on the students' ongoing experience.

In our casework we have seen a number of examples of providers that have carried out careful investigations and reached sound decisions. Sometimes unfairness can happen when someone acting in the investigatory process goes beyond the role that they have been assigned, for example by appearing to give assurances about the outcome to one party, by offering an opinion as to what the outcome should be when this is prohibited by the provider's own regulations, or applying sanctions that are not permitted without an additional layer of scrutiny.

When we identify procedural errors in the way any disciplinary investigation has been carried out, it is not usually appropriate for us to speculate about what the outcome might have been had those errors not occurred. Our usual approach is to recommend that the outcome be set aside and the process be repeated from the point at which the error or unfairness took place.

Case Summary 11

Harassment and sexual misconduct

Student A made a report to the provider about the conduct of student B. The two students engaged in sexual activity which both agreed was initially consensual. Student A reported that they had withdrawn consent, but that student B had not stopped the activity. The provider conducted an investigation under its student disciplinary procedures and decided that student B was "culpable of the allegation of rape". It decided to terminate student B's studies. Student B submitted an appeal, which was rejected, and they then complained to us.

We expressed concerns to the provider about the conclusion it had reached, which inappropriately referred to the criminal offence of rape rather than referring explicitly to the provider's own rules about student behaviour. We were also concerned that there had been no opportunity for student B to attend a panel hearing to present their version of events.

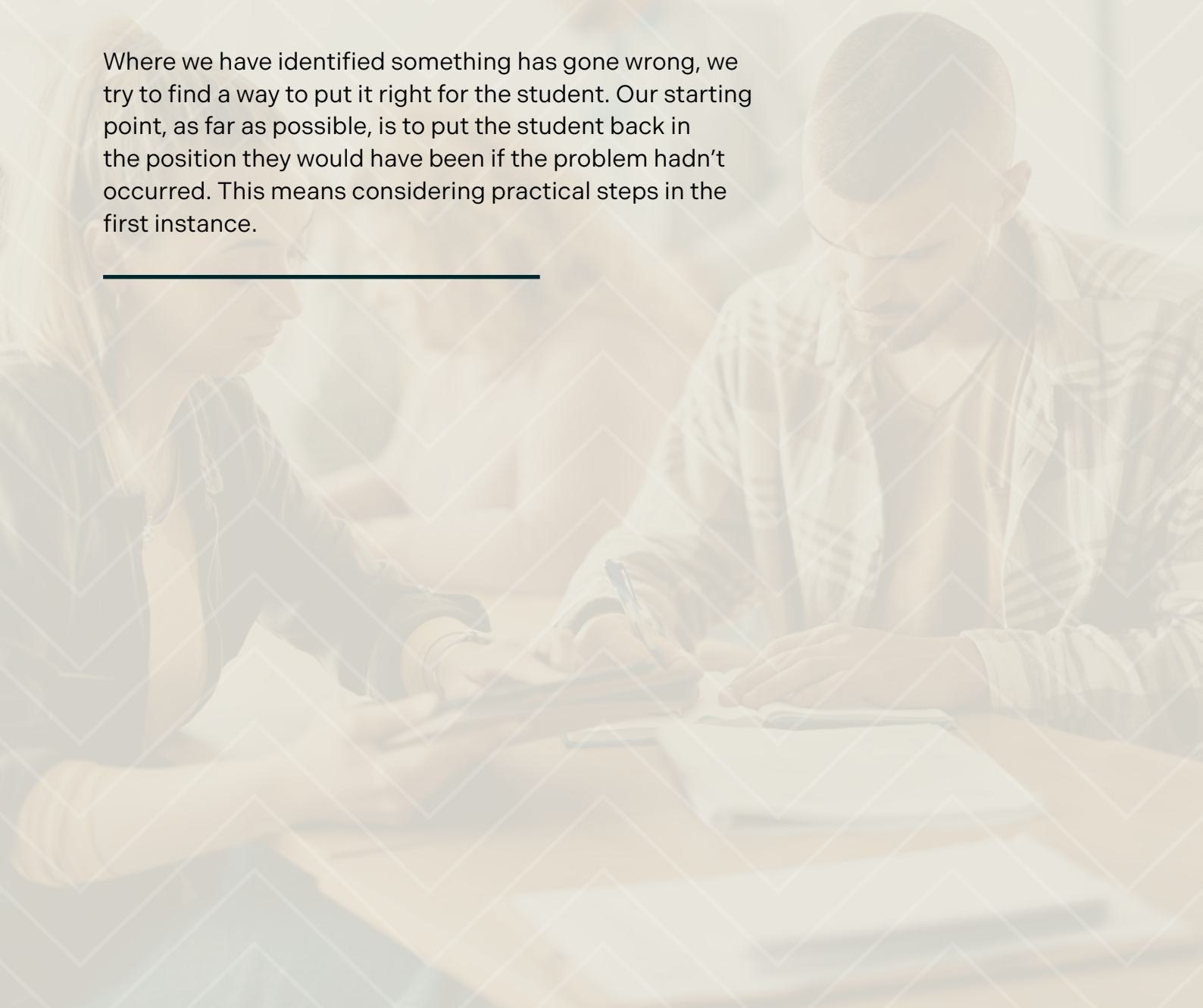
The provider offered to set aside the disciplinary findings and to repeat the disciplinary process afresh. The student accepted this offer.

When we recommend that a provider carries out a fresh investigation or hearing, this should not be understood as a direction that the new process must always result in a different outcome for the student.

In 2025 we saw that many providers are engaging proactively to improve how they can support all students affected by harassment and sexual misconduct. There is widespread agreement about the importance of providing accessible routes for students to make providers aware of what they have experienced, and of directing reporting and reported students to expert support. There is also agreement about the importance of explaining clearly what a provider can or cannot do when a student shares information about their experience, and the need to explore alternative options. The steps a provider will take to investigate a report are not wholly consistent across the sector. We hope that from 2026, the principles we describe in the Good Practice Framework will enable providers to design and operate fair processes that are appropriate to their specific communities.

Putting things right

Where we have identified something has gone wrong, we try to find a way to put it right for the student. Our starting point, as far as possible, is to put the student back in the position they would have been if the problem hadn't occurred. This means considering practical steps in the first instance.



Settlements

When students complain to us, we ask them to let us know what outcome they are seeking. In many cases, the outcome the student is looking for and what the provider has offered is not far apart, or what went wrong and the appropriate remedy is clear. In these situations, we try to help the student and provider reach an agreed resolution. We record these as settlements. They bring the complaint to an end without the need for a formal decision. This can happen at any stage of our process, provided both the student and provider agree.

Settlements can be an effective way to resolve complaints, leading to quicker outcomes and enabling creative solutions which address the heart of the student's concerns. In some cases, it means students can quickly return to studies without the need for further formal processes or delay.



"I would like to express my deepest gratitude for your help since day 1 with my complaint to the University. I really appreciate it. I didn't ask and expect for this to happen and it has affected my studies. It has not been an easy journey for me but thanks to you and the OIA. I have made it through. I wish you well in the future."

From a student following a settlement offer

Case Summary 12

Settlement

A provider withdrew a student because of low attendance. The student appealed the decision to withdraw them, saying that their record of attendance had been affected by a faulty access card. The provider reinstated the student on the condition that, by a certain deadline, they would attend all sessions with all attendance swipes recorded and that the student would meet with the student support team.

Following reinstatement, the student's tutor approved two absences due to a bereavement but the student was withdrawn a second time. The second withdrawal was actioned before the deadline had passed for the student to show improvement with engagement and meet with the student support team. The student was not offered a right of appeal against this decision.

The student complained to us and wanted to return to their studies immediately. They made it clear that the complaint was time sensitive as they were in danger of missing upcoming examinations, which would delay their progress into the next academic year. They also had concerns about their access to future student funding if the withdrawal decision remained.

We contacted the provider and asked it to consider settling the complaint. We explained our concerns that the student had not had the full opportunity to demonstrate improved attendance by the deadline given. It was not fair that the student did not have a right of appeal against the final withdrawal decision. The provider acknowledged that it would not be able to consider an appeal from the student before the exam period which was about to begin. Instead, it offered a pragmatic outcome. It agreed to take the student back on the course immediately. This allowed the student to sit the imminent examinations in the same academic session and progress to the next stage of the course.

The settlement was agreed within five working days of our initial assessment of the student's complaint. The student said,



“Thank you for your support and assistance throughout the process relating to my complaint. I am pleased to confirm that I have accepted the University's offer and will be reinstated to complete my studies. I am extremely grateful for the speed, clarity, and fairness with which the OIA handled my case during what has been a difficult and uncertain time for me. Your guidance and involvement have made a real difference, and I am now looking forward to re-engaging fully with my studies and completing my degree. Thank you once again for your time and support.”

In 2025, we resolved 506 cases through mutually agreed settlement. Just under three-quarters of settlements were initiated by us, but in the other cases the providers or students proactively suggested a way to reach an agreed outcome. When we have suggested that there is an opportunity to settle a complaint, we have been able to reach an agreed outcome about 60% of the time. When an offer of settlement has been made during our process but is not accepted by the student, we take this into account when we review the complaint. In 2025, around 30% of settlements which were not successful (because the provider had made an offer during our process which the student did not wish to accept) resulted in Not Justified (Reasonable Offer Made) decisions.

Some settlement outcomes were the result of a provider acknowledging that the information available to prospective and current students had not been clear and accurate. There is an onus on providers to supply information that is timely, unambiguous and not misleading. Some complaints we have received included reference to study abroad trips that didn't materialise, course title changes, and limited information about particular modules which led to dissatisfaction for students when their experience did not meet their expectations. In complaints of this nature we usually consider what was promised by a provider and what could reasonably be expected by a student against what was then delivered.

Other settlement outcomes included:

- Removing a penalty for academic misconduct. A student had uploaded their own work against the wrong module and had immediately sought help to fix the mistake. The provider accepted that its response had not been clear. The student was able to continue their studies.
- Making a fresh offer to a student about resubmitting their dissertation. The student's appeal had been upheld but the student was not sure about the outcome. The provider clarified the support that would be available, extended the deadline to account for some time when the provider was closed, and confirmed that the student could keep their original mark if their new submission received a lower mark.
- Funding a one-year personal subscription to Microsoft 365. There were good reasons why the provider could no longer give the student a standard IT account, but the student was finding it difficult to engage in their studies because of this limitation. The provider offered this solution while developing a longer-term solution for students with similar restrictions.
- Refunding costs incurred by a student when their course was cancelled at short notice. An international student had already incurred costs associated with travelling to the UK to study. In settlement the provider accepted the course was no longer available and refunded the student's first-year tuition fee, and paid for their additional healthcare surcharges, visa and flight costs totalling £14,948.

Recommendations

It is not always possible to reach a settlement. In these cases, we will carry out a detailed review to understand what happened, what the issues were, and how to put things right. If we decide a complaint is Partly Justified or Justified, we will make Recommendations. Sometimes we make more than one Recommendation for a student. In 2025, we made 635 Recommendations.

In 2025 practical remedies included asking providers to re-mark work, provide clearer academic feedback, more information in the breakdown of marking, uncapped reassessment opportunities, and referral back to examination boards where there is an issue relating to an assessment.

We also recommended that providers give students more information about why decisions had been taken, to help them understand what had happened. In some cases, we recommended the provider reconsider its decisions or offer practical steps to allow a student to rejoin a course. We also recommended reviewing Fitness to Practise decisions, or quashing disciplinary findings. In these cases, our role is not to substitute our judgment for that of an expert panel. Rather, where the process used to reach a decision was not fair, we may recommend that it is undertaken afresh to ensure that the student's circumstances are properly considered and that fair procedure is followed.

Financial outcomes

Where practical steps cannot fully address the impact on the student, we will usually consider financial remedies. Financial outcomes may be appropriate where a provider has failed to deliver the service the student could reasonably expect. For example, where there has been serious disruption to teaching, supervision or course delivery and the provider is unable to deliver it again in a way that meets students' needs. Financial outcomes may also reflect the distress and inconvenience caused by problems such as poor communication, significant delay or failures in handling the complaint including repeated missed opportunities to put things right. We list other examples of where we consider financial outcomes and what we take into account when doing so in our [putting things right](#) guidance.

In 2025, the total amount of financial compensation offered to students following a Recommendation was £875,933. In addition, £962,979 was offered as part of a settlement. The highest single amount of financial compensation was £38,000 as part of a settlement and £15,600 in a Recommendation. 165 students received £5,000 or more, of whom 26 received £10,000 or more.

Many of these higher amounts included partial tuition fee refunds as well as some financial payments for disappointment and/or distress and inconvenience. When we recommend that tuition fees should be refunded, our position is that the refund should normally be paid to the original funding source, for example Student Finance England or the student's sponsor. Legally, a refund is returned to a payer. Refunding the money to the funding source can also benefit the student in the longer term because it reduces the balance of their student loan and the interest that would otherwise accrue on it. This is why we make Recommendations this way, but we acknowledge in settlement negotiations it is ultimately up to a provider how it frames the offer.

Good Practice Recommendations

If our review identifies issues with the design or operation of a provider's processes, we make good practice Recommendations. These Recommendations are intended to help improve practice and reduce the likelihood of similar problems affecting other students in the future. We made 107 good practice Recommendations in 2025. Over half referred providers to the guidance available in our Good Practice Framework and recommended changes to their procedures. Common themes included ensuring clarity for students about timeframes, about setting out the respective responsibilities of delivery and awarding partners and ensuring that processes clearly set out how decisions will be communicated to students.

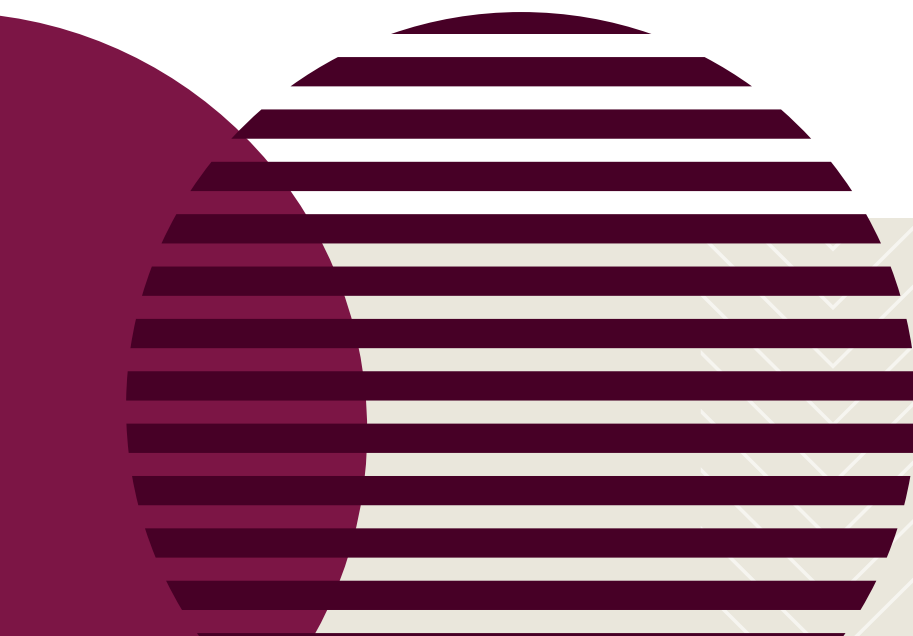
In some cases relating to sexual harassment and misconduct, our Recommendations focused on ensuring that processes are well understood and fair to all parties. This included making clear to students who will investigate allegations, including when an external investigator may be appointed. We also recommended that providers ensure risk assessments are clearly documented and that it is clear how those assessments inform decisions about any precautionary measures.

We also recommended that providers build-in steps to ensure that the potential impact of a student's disability on how they can engage with a process is actively considered, and to ensure that processes have sufficient flexibility to make adjustments where needed so that students are not disadvantaged.

Around a fifth of our good practice Recommendations referred to training staff who carry out processes and procedures. For example, we recommended that providers ensure staff receive training on principles of procedural fairness including how to gather and test evidence, apply standards of proof and provide clear reasons for decisions. Some Recommendations also focused on ensuring staff understand when different procedures should be used, when they need to consider specific duties under relevant legislation and how to communicate effectively and compassionately with students when concerns arise.

Other Recommendations included that providers should:

- Ensure that information provided to students during pre-enrolment and within handbooks is clear and accurate, for example about assessment requirements, pass rates, course start dates, and the respective responsibilities of delivery and awarding providers.
- Improve record-keeping during investigations and meetings with students (including, in some cases meetings to address supervisory relationships at risk of breaking down), to ensure that evidence considered and decisions reached are transparent and clearly documented. In some cases that has involved ensuring that transcripts of important meetings which have been auto-generated are checked for edits or corrections to ensure legibility.
- Amend regulations and procedures, so that students are clearly informed about the next steps available to them at the end of a process, including their right to bring a complaint to us.
- Ensuring staff consult appropriately with other services a student may be engaging with, for example disability support or other support services, before initiating support for study procedures.
- Review fitness to practise procedures to ensure temporary suspensions are reviewed regularly and that providers consider whether risks can be managed through alternative measures where appropriate.
- Review how unauthorised absence is recorded to ensure data is captured accurately.



Learning from complaints that are not upheld

In total, 1,992 of the complaints we completed in 2025 were Not Justified, but these still provide important learning for providers about how students experience their processes. In some cases, we made good practice suggestions based on observations from our review. For example, in one case the serious consequences of non-attendance on a student's visa were not mentioned in direct warning emails until the final stages. Although it did not affect the outcome for the individual student, we suggested that the provider review its communications about attendance to ensure that international students understand from an early stage that non-attendance may result in the withdrawal of visa sponsorship. In our experience, clear and unequivocal communication can help students understand the consequences of their actions and help prevent future complaints arising.

Compliance

Providers were expected to comply with the 676 Recommendations made during 2025 (some Recommendations made in late 2025 will become due for compliance during 2026).

A single provider was responsible for non-compliance with 58 Recommendations which we made at the end of our reviews of complaints brought to us by 28 students.

All of our other Recommendations were completed by providers, although sometimes these were subject to delay. 500 of the remaining 618 Recommendations were student-centred and 90% of these were completed on time. 85% of the 118 good practice Recommendations were completed on time. This is down from 2024 where it was 94% and 82% respectively. Complying with our Recommendations in a timely way is important to enable students to move forward and to ensure that other students benefit from improved processes as soon as possible.

On average late compliance was completed within five working days of the deadline, suggesting short-term issues with capacity at providers rather than an overall unwillingness to carry out the Recommendations.

BRIT College

We upheld complaints from 28 students studying at Brit College for the Level 5 Diploma in Education and Training (DET) awarded by City & Guilds.

The College had told the students that they had successfully completed the award but did not issue their certificates. Several months later, City & Guilds confirmed that the work that students had submitted and the placements some students had undertaken were not of the required quality. The College had accepted in correspondence with the students that there had been systemic failings in quality assurance. These failings meant that the students could not gain the qualification that they had registered for without significant further investment of time and effort. In each case we made student-centred Recommendations that the College should refund the tuition fees the students had paid (£6,165 each). We also recommended that the College offer each individual student between £6,000 and £8,000 for the disappointment, distress, and inconvenience caused by the systemic failures in quality assurance, and delay in offering a meaningful resolution to the students. The College said it could not comply with our Recommendations due to financial constraints.

We followed our Compliance Protocol and explained to the College that, under our Rules, we report non-compliance with our Recommendations to our Board and in our Annual Report. The College did not respond to us at any stage of this process.

We reported the College's non-compliance with our Recommendations to our Board in September 2025, and shared information about the complaints with the Office for Students, Department for Education, and Ofqual.

In November 2025 we also published the College's non-compliance in a **public interest case summary**. These cases highlight the impact on individual students where there is a gap in protections for students who study for HE qualifications awarded by organisations that are not OIA members.

Working with others

Working independently but interdependently with the wider higher education regulatory framework remains one of our key objectives. We have continued to meet and engage with key sector stakeholders. We worked with a wide range of organisations, including the Department for Education (DfE), the Welsh Government, the Office for Students (OfS), Medr, Universities UK (UUK), the National Union of Students (NUS), Colegau Cymru and the Quality Assurance Agency (QAA), among others.

We contributed to cross-sector forums and discussions, responded to consultations and provided evidence to the Higher Education Select Committee, ensuring that learning from complaints informs wider policy thinking. When relevant to their areas of responsibility, we shared information from student complaints with other professional statutory and regulatory bodies, including the General Medical Council, the Nursing and Midwifery Council, the Solicitors' Regulation Agency, and the Health and Care Professions Council.

Financial stability was a dominant concern for the higher education sector in 2025. This concern shaped much of our collaborative work; we brought our knowledge of student complaints into sector-wide discussions about how financial pressures can affect students' experiences and outcomes. We also continued to engage with providers where there was heightened risk, to support the aim of resolving concerns early, and minimising potential disruption for students.

The wider financial context has meant building on our longstanding aim that there should be appropriate protection in place for all students in the event of a provider closure. In July 2025 we published, with SUMS Consulting, [**Putting students first: Managing the impact of higher education provider closure**](#). The study drew on cross-sector perspectives and was well received. It has strengthened the evidence base for this potentially far-reaching area of work, and it has given us much to consider in terms of early intervention, funding, and the partnerships needed to improve outcomes for students when providers face market exit.

We also published a public interest case summary about the [**Applied Business Academy**](#). Similarly to Brit College, students were significantly affected by failures in quality assurance and could not achieve their qualification. The Applied Business Academy entered liquidation, and the liquidators informed us that it would be unable to comply if we were to make any Recommendations. These cases show the real-life impact on students of an insolvency regime that can only consider students as unsecured creditors once a provider goes into liquidation.

The example of Brit College and Applied Business Academy brought into sharper focus a continuing gap in protection for some students studying for higher education qualifications awarded by bodies such as City & Guilds and Pearson, where the delivering provider is not a member of the OIA. In these cases, students experienced harm arising from provider failure and quality assurance weaknesses; the routes to redress and accountability are limited once the provider is unable, or unwilling to, comply with our Recommendations.

We used our engagement with partners and regulators to raise the profile of this issue and to highlight the practical consequences for students when responsibility is fragmented across awarding bodies, delivery partners, and regulatory frameworks. This remains an important area for further cross-sector attention if students are to be properly protected when these arrangements fail.

We also continued to engage with the Higher Education (Freedom of Speech) Act 2023 and the related regulatory arrangements. Following the pause announced in 2024, the Government set out its approach during 2025, including bringing some provisions into force while proposing changes to elements it considers burdensome. We will continue to work with the OfS to support clarity for students and providers where there is potential for overlap, including taking account of relevant regulation and guidance when reviewing complaints, and sharing learning on systemic issues where appropriate.

In Wales, we continued to work with the Welsh Government and Medr. One of our large-scale projects was the implementation of the expansion of our remit into further education in Wales, alongside the development of the wider regulatory framework.

The timetable remains closely tied to the development of the regulatory framework, and we have stayed focused on supporting readiness across the system, with the intention that we will begin work in Welsh Further Education in September 2026, with necessary changes to allow full onboarding in place for September 2027.

We also remained engaged on consumer and dispute resolution policy. The Digital Markets, Competition and Consumers Act 2024 has implications for the regulation of Alternative Dispute Resolution (ADR) bodies, and we have continued to monitor developments, engaging where helpful to ensure our statutory scheme remains well understood within this landscape.

Meanwhile we continue to work towards our goal that all students should have access to independent redress by engaging with providers and awarding organisations who wish to join the Scheme voluntarily, alongside our work with qualifying institutions. In 2025, we welcomed Royal Academy Schools to the Scheme. RA Schools was established in 1769 and provides a postgraduate education in contemporary art practice. [**RA Schools formally became a member**](#) from January 2026.

A key part of our work with others is bringing our expertise to areas where it can benefit students, student organisations and providers. In 2025 we continued to contribute to cross-sector work on student mental health, including the Mental Health Taskforce, and we continued to embed the principles that support more compassionate communications and effective complaints handling in practice.

As well as our work within the HE sector, we are also part of a wider community of complaints and ombuds organisations. We remain active within the Ombudsman Association and the European Network of Ombuds in Higher Education, which facilitate valuable discussion about good practice in complaints handling.

Sharing learning from complaints

We use the insights from our data, external interactions with students, providers and student representative bodies (SRBs) and casework reflections to learn from complaints. This helps us understand emerging issues and trends in what matters most to students. It also helps us develop and share good practice across the sector and improve the student experience.

Casework notes and case summaries

We publish case summaries of complaints we have reviewed to help draw out themes and show patterns in where issues might arise and how we consider such issues. All summaries are carefully anonymised so that individual students and providers cannot be identified. Alongside these summaries, we also publish casework notes to share learning from groups of related complaints and highlight emerging themes in our casework. Together, these resources are intended to support reflection across the sector by making our reasoning transparent and illustrate how principles of fairness apply in practice. They sit alongside our Good Practice Framework, contributing to our wider work to promote effective complaint handling.

In 2025 in addition to the public interest case summaries, we also published case summaries and casework notes on two areas where the complaints we've seen have indicated evolving challenges for providers and students.

The first was on the theme of complaints relating to **harassment and sexual misconduct**. This draws together learning from cases involving how providers respond to reports of harassment and sexual misconduct and the processes used to investigate and determine those complaints. We emphasised the importance of fair procedures for all, clear communications about expectations and processes, and sensitive handling of complex and highly personal situations.

The second was on the theme of complaints relating to **AI and academic misconduct**, drawing on a small but growing number of cases where use of AI has been challenged through internal academic misconduct processes. We reflected on the importance of clarity and transparency in how providers define acceptable use of AI, and in how they explain and evidence allegations to students.



Good Practice Framework

In 2025 we developed and consulted on a new section of the Good Practice Framework about responding to complaints about harassment and sexual misconduct.

To inform the draft we sought views from a wide range of providers and SRBs, including both large and small or specialist institutions. We also engaged with sector organisations and independent experts in this area and were advised by a Steering Group with specific expertise in harassment and sexual misconduct cases.

We are grateful for the time individuals and organisations have taken to share their expertise and work collaboratively with us in producing this guidance. In 2026 we will consider the responses to our formal consultation and additional feedback before we finalise the section for publication.

Outreach activities

Our outreach activities in 2025 included webinars, workshops, discussion groups, contributions to external events, visits to providers and SRBs, as well as individual conversations with providers and SRBs. Listening to perspectives beyond the issues directly arising in the cases we review is central to these engagements. It helps us to understand barriers students face in using formal processes as well as better understand the challenges providers are experiencing. We also share good practice and learn from providers' and SRBs' examples of good practice and innovation, feeding these insights back into our casework and wider guidance.

Workshops, webinars and external events

In 2025, we delivered webinars aimed at staff within providers and staff and student officers within SRBs, covering a range of topics including more information about us, accommodation complaints, service issues and academic disciplinary matters. Attendance with our webinars increased significantly with 1,009 participants joining us in 2025, compared with 589 joining us in 2024.

We held two online workshops for SRBs, attended by 111 participants. These sessions included updates on our casework and guidance, and exploration of case studies about complaints from disabled students, harassment and sexual misconduct and complaints related to student activities. Taking account of feedback from 2024, we built in more time for discussion during these sessions, as participants often say they value the opportunity to hear how colleagues at other institutions approach similar issues and to share experiences and good practice.

We participated in a range of external events to share good practice, extend our own knowledge and keep in touch with sector development. We spoke at 21 events hosted by different organisations including the Academic Registrar's Council (ARC), Universities UK (UUK), UK Council for International Student Affairs (UKCISA), National Union of Students (NUS), Independent HE, Guild HE and the Association of Colleges. We contributed to discussions on issues such as complaints and appeals practice, the international student experience, disabled students' experiences, financial sustainability and harassment and sexual misconduct.



Discussion groups

We held 18 themed discussion groups with providers, students and student advisors. Some discussion groups also supported specific work, including the development of the new Good Practice Framework section about harassment and sexual misconduct.

Students shared a range of experiences with us, including positive examples of support and representation. Students also told us about challenges navigating additional consideration processes, particularly around evidential requirements and delays in receiving outcomes. Some students described the pressure of balancing study (including remedial assessments) with paid work commitments, the latter being essential to support themselves financially. For some international students in particular, missing paid working hours was not a realistic option. This added to their stress when decisions affecting their assessments were communicated close to deadlines.

Discussion groups with disabled students highlighted some progress towards more inclusive teaching and assessment practices. But students flagged ongoing concerns about the complexity of obtaining diagnoses and reasonable adjustments, as well as physical access barriers on campus.

Our discussion groups with providers and student advisors explored operational challenges such as assessing evidence submitted in support of additional consideration requests and responding to suspected fraudulent evidence. Participants also discussed the impact of wider sector pressures, including staffing changes and resource constraints on student-facing processes and services, whilst sharing different approaches and examples of practice across institutions.

Visits

In 2025 we continued to visit providers and SRBs, usually meeting with case-handling teams as well as staff supporting disabled students. We visited a number of Welsh FE providers in preparation for our expanding remit. We also targeted some providers with lower than anticipated numbers of complaints to the OIA, to identify any areas of good practice. We also wanted to identify barriers to engagement with the OIA and gather feedback to improve our guidance, outreach and support.

We explored a number of areas and emerging issues with those we met on our visits. Some of the visits highlighted challenges providers face in balancing growing demand for individualised support from an increasing number of disabled students against limited resources. The ongoing implementation of the Equality and Human Rights Commission guidance continues to be a significant challenge for many. We heard how staff are often stretched across multiple roles, with recruitment freezes adding pressure on services. We also explored how providers are responding to the rise of AI, both in how students use it in academic work and in preparation of complaints and appeals, as well as how providers are utilising it themselves to improve efficiency.



“Thank you so much for the very comprehensive feedback on our policies and systems. We will 100% factor these in (along with reviewing your guidance) when we start our annual review of our policies from March 2026. This feedback is really helpful... I found the meetings with you both really valuable, and that your approach was so positive, constructive and informative - really helpful. Thank you to both of you for your time with us. We welcome further visits.”



“We extend our thanks to you for a very engaging day. I have had very positive feedback from some of my colleagues who attended, and I believe everyone found the sessions very useful and informative, with many colleagues staying for the whole afternoon, rather than the sessions that they were originally allocated to attend.”

If you have any questions about good practice, the Scheme or would like to have a conversation with us about emerging issues you are welcome to get in touch. You can contact our dedicated outreach team on: outreach@oiahe.org.uk.

Advisory Panels

We have two advisory panels which meet twice a year. Our case-handling staff can also put questions to Panel members outside of these meetings for their expert input.

The Panels do not see or make decisions on individual complaints. They are designed to act as a general sounding board to guide us about common sector practice and as a thermometer to help us gauge current concerns and identify emerging issues.

Higher Education Advisory Panel

This year our Higher Education Advisory Panel (HEAP) explored issues and patterns in complaints as well as exploring the impact of financial and other pressures in the sector and the effect of cuts or changes to staff, services and course offerings, and how they're affecting students and complaints. We also sought their views on the development of our new section of the Good Practice Framework: Handling reports of harassment and sexual misconduct.

Panel members come from a range of providers and SRBs that reflect the diverse membership of our Scheme in terms of type, size, location, student population and course offering.

HEAP Panel members during 2025:

- **Adrian Spence**, Head of Advice, Wellbeing and Accommodation Support, Aston Students' Union, Birmingham
- **Carmen Neagoe**, Head of Educational and Teaching Support, Judge Business School, University of Cambridge
- **Cat Turhan**, Director of Membership Services, Imperial College Union
- **Charlotte Levy**, Assistant Registrar in Examinations, Conferment & Award, University of West London
- **Claire Blanchard**, Partnership Lead, University of Wales Trinity Saint David
- **Dr Mark Hollingsworth**, Deputy Chief Operating Officer, City St Georges, University of London
- **Dr Nathan Morris**, Senior Assistant Registrar (Student Complaints), University of Warwick
- **Melissa Reilly**, Head of Student Support, University Academy 92 (UA92)
- **Nicholas Whitehouse**, Coordinator, Mixed Economy Group of Colleges
- **Zoë Allman**, Associate Dean (Education), De Montfort University

Disability Experts Panel

Our Disability Experts Panel (DEP) is made up of disability practitioners and experts in disability matters from specialist organisations and higher education providers. In 2025, we recruited to the Panel to replace members whose term expired. In doing so, we sought to strengthen subject areas related to small and specialist (including medical) providers, expertise in neurodiversity, mental health or fluctuating long term conditions and safeguarding. We welcome the expertise of our new members.

This year the DEP reported that delays with the process of applying for Disabled Student Allowance (DSA) funding persist, and panel members expressed concerns about the quality and consistency of needs assessment processes. The DEP also discussed how resourcing reasonable adjustments that are not fully funded by the DSA is becoming an ever-increasing challenge for providers. The Panel helped us to keep up to date on ongoing work in the sector to support providers to understand the difference between competence standards and assessment methods, so that reasonable adjustments are made in line with law whilst maintaining academic integrity.

DEP panel members during 2025 were:

- **Alice Speller**, Chief Executive, National Association of Disability Practitioners
- **Professor Carol Evans**, Pro-Vice-Chancellor, Education and Student Experience, University of Salford
- **Donnie McCormick**, Founder & Managing Director, Safeguarding HE
- **Harriet Cannon**, Assistant Head of Disability Support, University of Leeds
- **Helen Childs**, Head of Disability, Specific Learning Difficulties and Neurodiversity, Student Services, University of Kent
- **Laura Nettell**, Head of Student Wellbeing, University of Gloucestershire
- **Lucy Merritt**, Education Policy Manager, Thomas Pocklington Trust
- **Nicola Mason**, Influencing and Advocacy Lead, Student Minds
- **Phil Scarffe**, Head of Student Experience and Wellbeing, University of Birmingham Dubai
- **Rebecca Bouckley**, Student Support and Engagement Manager, The Tavistock and Portman NHS Foundation Trust

Improving what we do

In 2025 we continued to focus on making sure that service users are at the centre of our casework process.

A core aim of our Strategic Review was that processes are efficient and centred on effective resolution and remedy. Throughout 2025, and in the context of an increasing number of complaints, we continued this essential work, helping to shape an increasingly accessible and easy to navigate service for our users, whilst also ensuring that we remain agile and responsive in how we process complaints.

We made further progress in the timeliness of our casework, with more than 90% of complaints closed within six months and average case handling time reduced to 81 days, while also handling record volumes of complaints.

Alongside this, we continued to strengthen the support available to students navigating our Scheme, with a focus on making our processes clearer and easier to engage with in practice. We also used learning from complaints more deliberately, sharing insight with providers, SRBS and wider sector partners so that individual cases could contribute to broader improvement across the sector.

We also undertook an accessibility and inclusion review to inform the development of our work. The review provided internally focused, evidence-based insight into how students experience our processes, communications, and digital services, and identified a number of themes to help shape our next phase of improvement.

These themes include strengthening the clarity and accessibility of our information, further developing the student-facing experience of our digital channels, and undertaking an update to our website and social media content so that our external communications are clearer, more accessible and more inclusive for the people who use them.

This work will form part of a broader programme of service improvement as we continue to embed accessibility more consistently across the organisation including as part of our refreshed Communications Strategy.



“I understand the outcome is not what I wanted but am moving forward with a peace of mind. I wanted to say thank you for your efforts.”

From a student following a not justified decision

Student Feedback

Feedback from students is very valuable to us and informs so many of the developments we continue to make in what we do. We continued to invite feedback from students in 2025, along with gathering helpful insights from the students who took part in our student discussion groups and our more general engagement with students during our process.

Some students are very satisfied with our service, with a high proportion of those who respond to our surveys saying that we have treated them with respect and politeness. Others express concerns, most commonly around understanding our processes and decisions, the extent and nature of our remit, and perception of a lack of impartiality. We are continuing to improve how we explain what we can and cannot do, both in the general information for students and within individual cases. We have also considered what students have said to us about their perceptions of what independence and impartiality mean and fed this into our strategic review work.

Students who are unhappy with the service we have provided while we are handling their complaint can make a complaint. The complaints we receive about our service, as well as being an opportunity to put things right if they have gone wrong, can also help us to deepen our understanding of how students might experience our process and how we can further improve our service. This is an important part of our ongoing strategic work to put service users at the heart of what we do. In 2025, we received 63 service complaints, compared to 45 in 2024. While this is a significant increase on 2024, this sits within a broader increase in overall case numbers.

We are reviewing the way in which we communicate with students, particularly when we may be delivering a disappointing decision and/or communicating with a vulnerable student. We also feed in learning to make sure that students can engage more easily with our process.

Some of the complaints we received raised issues about the merits of the student's complaint about their provider, but we cannot consider those issues under our service complaints procedure. Where appropriate, we will sometimes explain our approach and signpost the student to the appropriate route for raising these types of concerns about their case or a decision.

Legal challenges to our decisions

Our case decisions can be challenged by judicial review. Judicial review cases often provide useful learning and insights for us, we value reflections from judges on our decisions and processes. Even when permission for a judicial review is not granted by a judge, we sometimes identify ways we can improve our processes and service.

During 2025 we received a total of 14 new judicial review claims, compared with 13 in 2024 and 10 in 2023. The number of pre-action protocol letters received in 2025 was 36. In 2024 we received 27 pre-action protocol letters, and in 2023 we received 12. The court has refused to grant permission for a judicial review in respect of three of the claims received in 2025, two claims were discontinued by the Claimant whilst awaiting a court decision, one is awaiting the court's approval following settlement agreed with the student to discontinue the claim, and we are waiting for the court to reach a decision in respect of the other eight claims.

We continue to see a trend of increased numbers of students who engage in the judicial review processes without legal representation. These matters can present additional challenges for us when responding. We recognise that the costs involved in litigation can be significant. We make every effort to keep our costs low, but we also have a responsibility to recover the costs we incur when successfully defending claims that are made against us.



“Thank you very much for calling me today. Speaking to you has put my mind at ease to a considerable degree. Thank you also for being so prompt in emailing me regarding the next steps in the process.”

From a student during our triage process

Our people

As a casework organisation, our people have shared professional values, a wide range of skills and life experiences, and a commitment to the work we do. We work together in a positive and collaborative way to deliver the best service we can across all areas of our work as an ombuds service.

In 2025 we continued to grow our organisation. For the first time, we increased to consistently over 100 (headcount) employees. With continuing increases in our staffing, as well as in the number of complaints coming to us, we have managed key aspects of our work effectively.

In our recruitment, we maintained a strong focus on skills and continued to use our Applied recruitment system, which uses anonymised applications and structured, skill-based assessments to identify the best candidates for a role.



“This has genuinely been the most enjoyable application process I’ve experienced and I mean that sincerely. It was refreshingly pain-free, (no endless notifications or rigid portals), and easy to engage with. I’m currently applying regularly, and this process stood out as exceptionally pleasant and thoughtfully designed... I only wish more organisations approached hiring like this, it would make the process far less daunting and much more human.”



“As well as feeling that you are engaging in a fair and balanced process, it also gives a sense of what the hiring manager is looking for in a candidate and the community and ethos of the company.”



“Thank you so much for getting back to me and for providing such thoughtful and detailed feedback. I truly appreciate the time the team took to review my application. As a point of feedback, this is by far one of the most comprehensive and constructive responses I’ve received. It means a lot.”

Learning and development

We continued to work towards a culture of continuous and intentional learning; focusing on how we embed our learning and prioritise what is most important; aligning learning with our strategic priorities, reviewing future skill requirements, and continuing to listen to feedback from our people.

Our work in 2025 focused on prioritisation of our learning and development activity, setting out our approach to embed competency frameworks across our organisation and introducing personal development planning.

We introduced new learning pillars that the majority of our learning and development activity will fall under, to support intentional prioritisation and, most importantly, ensure what we learn and skills we develop can be practised and embedded in our day-to-day work, enabling delivery of our strategy.

We continue to progress with planning and delivery of learning programmes under our pillars in 2026; most notably leadership development, equality, diversity and inclusion, and change management, as well as continuing to hone and develop skills and capabilities connected to our Scheme development, such as under-18 safeguarding.

We initiated workshops with our colleagues on what is important to them when embedding competency frameworks and discussed the value we want to derive from such frameworks, ahead of implementation across the organisation in 2026.



Employee voice

We continued to strengthen how we listen to and act on feedback from our people. Our Staff Liaison Committee met regularly through the year, providing a consistent forum for dialogue with team representatives. This year we widened team representatives to include a GMB representative to support open and constructive engagement.

We held various workshops with our people throughout 2025 as part of our wider strategic planning cycle: we have sought to better understand what matters most to colleagues in their work.

We will continue to underpin employee voice with data, using a mix of regular, light-touch feedback mechanisms, and targeted short pulse surveys to help us gather insight, understand impact and inform to continually develop our organisation.



“My role is Governance Officer, working in the Leadership, Governance and Communications team. I really enjoy being in a role where I get to support the Board and help shape big decisions. I support the Board and senior leaders, keep meetings running smoothly, and help make sure our decisions are clear, accountable and in line with best practice. I’ve picked up a mix of skills from being a paralegal, working in the civil service and then moving into an education trust... I wanted to do something that actually feels meaningful, and this role feels like the right fit for my experience and the kind of work I enjoy. It’s the kind of place where I know I can genuinely add value and make a positive difference. I’m also fortunate to work with a great team, and I genuinely enjoy the way we collaborate and support one another.”

Shazia
Governance Officer



“Working within higher education is really important to me. I believe very strongly in the transformative power of higher education, particularly for students from disadvantaged, or under-represented groups. The OIA plays a critical role in protecting the interests of students and so it is a way for me to do work that I am passionate about, and proud of... My role at the OIA is to make well-reasoned and informed decisions, so I genuinely enjoy the whole thing.”

Daniel
Assistant Adjudicator

The Rebecca Marsland Award

The Rebecca Marsland Award was created in 2019 in memory of our former colleague who passed away.

Each year, it is awarded as a celebration of an outstanding contribution to our work, an exceptional personal achievement, or an act of kindness. We invite colleagues to make nominations and the Independent Adjudicator, and the Chief Executive, together with a previous year's winner of the award, decide on a winner.

This year, we received over 46 nominations, with the award ultimately given to Jim, who is the Case Coordinator for the case-handling teams. Jim was described by colleagues as both "kind" and "one of a kind", and he received many nominations from colleagues across several teams. Jim was also recognised for his support and guidance to colleagues, drawing on his extensive case-handling expertise, as well as his generosity, humour, and empathy. Congratulations, Jim.



From left to right, Helen Megarry, Ben Elger, Jim, Sim Scavazza

Investing in our infrastructure

Another of our major milestone projects was to relocate our office in the heart of Reading City Centre.

Our relocation marked an important step, providing a modern, accessible workspace designed to support how we work now and into the future. The office offers a welcoming environment for colleagues, visitors, and stakeholders, with spaces designed to enable both focused work and greater collaboration across teams during 'in office' days.

The work was undertaken at pace by the Operations Team, delivering the project on time and within budget, ensuring a long term home for the OIA in Reading.



Organisational structure

Board of Trustees / Directors

Independent Adjudicator Helen Megarry

Chief Executive Ben Elger

Casework Support

Head of Team
Chris Pinnell

Casework Support Managers
Tim Cadd, Nicole Sanderson

Public Policy

Head of Team
Charlotte Corrish

Sub-teams of Casework Administrators

Leadership, Communications & Governance

Head of Team
Adam Waddingham

Communications Manager
Peter Le Riche

Assessment & Resolution

Head of Team
Chris Pinnell

Adjudication Managers
Sally Adams, Craig Howlett, Simon Balmuth, Rachel Thackray

Communications Services

Governance Services

Leadership Office

Sub-teams of Case-handlers

Adjudication

Head of Team
Zoë Babb

Adjudication Managers
Tracey Allen, Sarah Redford, Claire Skelly, John Wolf

Data, Technology & Operations

Head of Team
Dan Saward

Operations Manager
Claire Kurowski-Ford

Sub-teams of Assistant Adjudicators

Data & Technology Team

Operations Team

Outreach & Insight

Head of Team
Jo Nuckley

Outreach Manager
Emma Jackson

Insight Manager
James Hare

People & Culture

Head of Team
Michaela Hanbuerger

Outreach Team Insight Team

People & Culture Team

Our Board of Trustees / Directors

In 2025 we continued to embed the new Articles of Association and governance arrangements that came into effect on 29 October 2024. These arrangements preserve the valued involvement of sector and student perspectives while safeguarding the OIA's independence, and they are designed to remain flexible as the higher education landscape continues to change.

Under the revised arrangements, Trustees are appointed through open recruitment within a framework that sets out the skills, experience and diverse perspectives required, including student perspectives and both English and Welsh sector perspectives, in an appropriately balanced way. During 2025 we completed recruitment to fill a number of vacant sector-perspective and student-perspective positions, and in December 2025 we undertook a governance effectiveness exercise to support continuous improvement.

Board members are not involved in the review of individual complaints. The Board's responsibilities include: preserving the independence of the Scheme and the role of the Independent Adjudicator; oversight of the performance and effectiveness of the Independent Adjudicator, the Chief Executive and the OIA Scheme; setting the budget for the OIA and the level of subscriptions payable by providers each year, and approving the Rules of the Scheme.

In September 2025, we paid thanks to Catherine Mountford as the interim Head of Leadership Office and welcomed Adam Waddingham as Company Secretary & Chief of Staff supporting the work of our Board and leading our Governance Services, Communication Services, Service Complaints, and Leadership Office divisions.

Trustees/Non-Executive Directors

Trustees/Non-Executive Directors are appointed by the Board of Trustees. They are normally appointed for a term of three years and serve up to two terms. The Board may decide to extend a Trustee's period of service up to a maximum of nine consecutive years.

The Trustees of the charity and Directors of the charitable company, who served during 2025 and were members of the Board at the end of the period, were as follows:

Lay Trustees/Non-Executive Directors

- **Sim Scavazza** – Chair
- **Martin Kirke** – Deputy Chair, and Chair of People and Remuneration Committee
- **Andrew Chandler** – Chair of Nominations and Governance Committee
- **Nicola Flint** – Chair of Finance Committee
- **Jonathan Rees** – Chair of Audit and Risk Committee

Trustees/Non-Executive Directors with a sector perspective

- **Professor Wendy Finlay** – English sector
- **Professor Osama Khan** – English sector (appointed May 2025)
- **Professor Shân Wareing** – English sector (appointed May 2025)
- **Professor Rachael Langford** – Welsh sector (appointed May 2025)
- **Dr Gwawr Taylor** – Welsh sector (appointed May 2025)

Trustees/Non-Executive Directors with a student perspective

- **Adesewa Adebisi**
- **Alex Stanley**
- **Sophie Williams**

Our Strategy and Operating Plan

In 2025, the OIA began delivering its new strategy, built around two connected aims: to be trusted and valued for the way we resolve complaints, and to have impact by helping the sector handle complaints better and use learning to improve students' experiences.

These aims are the ways in which our charitable purpose of advancing education for public benefit through the independent review of student complaints in England and Wales and, by using learning from complaints to help improve policies and practices were fulfilled.

Our new strategy gave clearer shape to our work across four priorities: casework, stakeholder engagement, strengthening our evidence base, and organisational and cultural development. Throughout the year, these priorities helped us respond not only to the complaints brought to us, but also to the wider pressures facing us as an ombuds service at a pivotal moment of change.

Against a backdrop of a 17% increase in cases, a major focus of the year was making sure our service remained timely, accessible and fair. The Operating Plan for 2025 committed us to a casework approach with service users at its heart, focused on effective resolution and remedy.

The Operating Report shows strong delivery against that aim: we responded to 98 per cent of enquiries within two working days, made 95 per cent of eligibility decisions or requests for further information within 10 working days, and closed 93 per cent of cases within six months of receipt, exceeding each of the timeliness targets we had set for ourselves.

But 2025 was not only about handling more complaints. It was also about increasing the OIA's impact beyond individual cases. Our new strategy places greater emphasis on influencing improvement across the sector, and during the year we expanded our engagement with students, student representative bodies and providers. We ran 11 webinars attended by more than 1,000 delegates, held discussion groups for providers, SRBs and students, and visited 18 providers and their SRBs.

We also continued to share learning from our casework in more practical and targeted ways, including work on harassment and sexual misconduct, artificial intelligence and academic misconduct, and student protection. This reflects a central aim of the strategy: not simply to review complaints independently and fairly, but to use what we learn to support better complaints handling and fairer practice across higher education.

A further strand of work in 2025 was strengthening the evidence, systems and organisational foundations that support our role. The Operating Plan identified the need to improve the quality of our data and insight, and to strengthen the organisation so that it can respond effectively to growing demand and future change. During the year, we reviewed how our case-handling system and data structures were working in practice, identifying opportunities to improve consistency, reduce duplication and support deeper analysis.

At the same time, we invested in leadership and management development, refreshed communication strategy, renewed employee voice arrangements, and continued to embed our commitment to equality, diversity and inclusion in both our service and our internal development. Alongside recruitment to the Board, under our new governance arrangements, this work helped build the resilience, capability and accountability needed to deliver the strategy over the longer term.

Taken together, 2025 was the first year of putting our new strategy into practice. It showed the OIA responding effectively to record demand while also laying the groundwork for longer-term change: a more user-focused casework process, stronger engagement and influence, a better evidence base, and a service more equipped to deliver for its users.



Subscriptions

We are funded by subscriptions from higher education providers that are members of our Scheme. Our Board sets the level of subscriptions each year. There are two elements to the subscription, a core subscription and a case-related element.

Subscription levels are reviewed annually. In line with an upward trend over several years, we again saw a significant increase in the number of complaints we received in 2025, and we expect this to continue going forward. We continued to focus on handling cases as efficiently as possible.

We are aware of the considerable financial challenges facing the higher education sector. Our Board carefully considered the resource needed to deal with our caseload alongside the financial pressures in the sector and agreed to freeze core subscription rates for 2025 for all providers.

Some providers also pay a case-related element of the subscription. This is payable when the number of points allocated to complaints received about the provider in the previous year exceeds the band's points threshold. The number of points above the threshold determines the case-related element of subscription. The points allocated to a case are based on whether it is not eligible for us to review, is settled or withdrawn before it goes to full review, or is fully reviewed. This maintains the vital principle that there should be no link between the outcome of eligible cases and the amount of the case-related element paid.

Our Board is acutely aware of the financial challenges facing providers. To this end, a 1% uplift in core subscription fees and a £5 per point increase in the case element of subscriptions was agreed for 2026.

More details of our [subscriptions arrangements](#) can be found on our website.

Core subscription fee rates for 2025

(pro-rated for providers joining the OIA Scheme part way through the year)

Student numbers	Band	Core Subscription Fee (£)	Core Subscription Fee (£) (HE in FE providers only)
Up to and including 200 students	AA	566	396
201 to 500 students	A	1,168	818
501 to 1,500 students	B	2,358	1,650
1,501 to 6,000 students	C	12,677	8,874
6,001 to 12,000 students	D	25,152	17,607
12,001 to 20,000 students	E	41,807	29,265
20,001 to 30,000 students	F	63,195	44,237
30,001 to 50,000 students	G	75,099	52,570
50,001 to 100,000 students	H	92,415	64,690
More than 100,000 students	I	141,989	99,393

Core subscription fee rates for 2026

(pro-rated for providers joining the OIA Scheme part way through the year)

Student numbers	Band	Core Subscription Fee (£)	Core Subscription Fee (£) (HE in FE providers only)
Up to and including 200 students	AA	572	400
201 to 500 students	A	1,180	826
501 to 1,500 students	B	2,382	1,667
1,501 to 6,000 students	C	12,804	8,963
6,001 to 12,000 students	D	25,404	17,783
12,001 to 20,000 students	E	42,225	29,558
20,001 to 30,000 students	F	63,827	44,679
30,001 to 50,000 students	G	75,850	53,095
50,001 to 100,000 students	H	93,339	65,337
More than 100,000 students	I	143,409	100,386

The core subscription fee for 2025 for the following providers was £330 (£333 in 2026):

- Providers of School-Centred Initial Teacher Training (SCITTs)
- Providers that are brought into membership of our Scheme because their designated HE provision is franchised from another provider, and (if they are based in England) they are not on the OfS Register
- Providers in England that are not on the OfS Register but are providing a course leading to an award of another member of our Scheme that is in England.

Statement of financial activities

For the year ended 31 December 2025

	Total Unrestricted funds 2025 £	Total Unrestricted funds 2024 £
Income		
<i>Income from investments</i>	241,290	187,928
<i>Income from charitable activities</i>		
Subscriptions	8,893,388	8,255,722
<i>Other income</i>	46	328
Total income	<u>9,134,724</u>	<u>8,443,978</u>
Expenditure		
Charitable activities	8,062,317	7,563,029
Total resources expended	<u>8,062,317</u>	<u>7,563,029</u>
Net income	<u>1,072,407</u>	<u>880,949</u>
Net movement in funds for the year	1,072,407	880,949
Total funds at 1 January 2025	<u>3,330,818</u>	<u>2,449,869</u>
Total funds at 31 December 2025	<u><u>4,403,225</u></u>	<u><u>3,330,818</u></u>

The amounts derive from continuing activities. All gains and losses recognised in the year are included in the statement of financial activities.

Balance sheet at 31 December 2025

	2025		2024	
	£	£	£	£
FIXED ASSETS				
Tangible assets		38,962		33,301
Intangible assets		89,713		172,524
		<u>128,675</u>		<u>205,825</u>
CURRENT ASSETS				
Debtors	201,636		233,109	
Cash at bank and in hand	9,774,756		8,541,084	
	<u>9,976,392</u>		<u>8,774,193</u>	
LIABILITIES:				
Amounts falling due within one year	<u>(5,501,842)</u>		<u>(5,449,200)</u>	
NET CURRENT ASSETS		<u>4,474,550</u>		<u>3,324,993</u>
TOTAL ASSETS LESS CURRENT LIABILITIES		<u>4,603,225</u>		<u>3,530,818</u>
NET ASSETS EXCLUDING PENSION PROVISION		4,603,225		3,530,818
Pension provision		<u>(200,000)</u>		<u>(200,000)</u>
TOTAL NET ASSETS/(LIABILITIES)		<u><u>4,403,225</u></u>		<u><u>3,330,818</u></u>
FUNDS				
Unrestricted Funds				
General Reserves		<u>4,403,225</u>		<u>3,330,818</u>
		<u><u>4,403,225</u></u>		<u><u>3,330,818</u></u>

These constitute summarised financial statements and do not include the financial information and disclosures required in a full set of financial statements.

The full set of audited [financial statements](#) can be found on our website.



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Annual Report 2025

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