

# **Our response to the Office for Students consultation on Constructing student outcome and experience indicators**

Universities UK (UUK) is the collective voice of 140 universities in England, Scotland, Wales, and Northern Ireland. Its mission is to create the conditions for UK universities to be the best in the world, maximising their positive impact locally, nationally, and globally. Universities UK acts on behalf of universities, represented by their heads of institution.

## **General questions**

### **Question 1: Are there aspects of the proposals you found unclear? If so, please specify which, and tell us why.**

It would be helpful for providers to have documentation that provides the HESA fields that were used in constructing the indicators and the calculations and populations on which they are based. We have received feedback that in some cases institutions are left to assume or create proxies as a full description of the data is not available or it is not clear which HESA data has been used to produce the measures. As institutions will rightly want to ensure that measures are accurate and replicate them in places, this information will be helpful in allowing them to do so. This will be particularly relevant as the sector moves towards changes in data collection (i.e., Data Futures).

**Question 2: In your view, are there ways in which the objectives of this consultation (as set out in paragraphs 8 to 16) could be delivered more efficiently or effectively than proposed here?**

We have concerns with the long-term sustainability of the approach outlined in the consultation given upcoming fundamental changes to collection of data (i.e., Data futures) and wider higher education policy (e.g., implementation of the Lifelong Loan Entitlement (LLE)). The current indicators are based on a narrow view of study as continuous, linear, and linked to a qualification, which may not be the case for a significant proportion of provision in the medium- and long-term following implementation of the LLE. The OfS should continually monitor the relevance of the approach to constructing indicators and whether they are delivering desired aims.

The OfS should not try to apply the approach outlined in this consultation to all future forms of provision without further engagement and consultation with the sector – particularly where the measures may not be appropriate and/or reliable data is lacking.

Given the complexity and considerable technical detail in this consultation, and the substantial shift in approach, it is critical that the OfS monitors and evaluates whether these indicators remain relevant and appropriate. We would welcome ongoing engagement with the OfS to monitor where changes might be needed to the design and construction of the indicators.

There is a risk that the short timescales of this consultation, substantial technical detail, and high volume of material institutions have had to respond to as part of this and parallel OfS consultations on regulating quality and standards and TEF, may result in negative implications of the proposals not being picked up in responses, particularly those regarding equality and diversity.

The OfS should conduct and publish an equality impact assessment on the proposals. Indicators needs to be designed in a way that does not include definitions that might be affected by unconscious biases that do not support the diversity of the sector and student population. The sector then needs an opportunity to comment on this and suggest mitigating actions where concerns and potential unintended consequences are raised.

The OfS should give regard to additional burden that the proposed approach to development of indicators will place on universities and the OfS itself. Although the burden of production and dissemination of data will not fall on universities, they will

need to allocate substantial staff resource and skills to managing, monitoring, and understanding the implications of this complex data.

We would also reiterate points made by UUK previously that the OfS must give greater thought to the timing and presentation of its consultations to ensure the sector can meaningfully engage without such a burden that it has the potential to impact on the amount of time available to work with students.

## **Questions relating to proposal 1: Common approaches to the construction of student outcome and experience measures**

**Question 3: To what extent do you agree with our proposed approach to constructing binary measures using existing data collections? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We approve of the proposals for greater consistency, coherency, and transparency in construction of indicators, provided they account for and reflect the diversity of university provision.

Continuation, completion, and progression are useful measures of student outcomes, and we recognise the relationship between quality and outcomes. We know that they matter to graduates and there is a history of measuring performance against these indicators. However, we also know they are not the only measures of quality with graduates having different views based on individual interests and ambitions.

We have concerns with the long-term sustainability of these measures given upcoming fundamental changes to collection of data (i.e., Data Futures) and higher education policy (e.g., implementation of the LLE). The current indicators are based on a view of study as continuous, linear, and linked to a qualification, which might not be the case for LLE, depending on how it develops.

The desire for a more flexible skills system is likely to mean learners reskilling throughout their lives. We have concerns about the appropriateness of these measures for students studying on a flexible modular basis. For example, at what point would it be appropriate to assess continuation and completion, and which

provider over the course of a student's 'step on step off' education would be judged on this?

Given the lack of clarity on the medium-term approach to measuring outcomes for modular provision, availability of data to do so, and the impact this may have on incentivising providers to scale up provision in this area in advance of the LLE, we propose that the OfS places a moratorium on inclusion of modular provision in regulation of quality and standards until robust data and meaningful measures can be developed. We would like to work with the regulator to achieve this.

We have concerns with proposals, in some cases, to link data to external sources, which is likely to result in institutions being unable to reproduce or access granular data used in B3 judgements for their provision. For example, there are limitations to consider in linking data with the National Pupil Database. Access to this database is not guaranteed for providers, meaning universities would be more likely to gather their own data, which reduces the likelihood of reducing burden on providers and comparability.

The general focus on a binary approach to 'positive outcomes' can often be limited. While understanding that this can be simpler than using more complex measures, we think that this must remain under review. We have concerns with the continued relevance of these definitions over time, and question how they will reflect changing evidence and literature on the link of outcomes to success for students and taxpayers.

We ask that the OfS sets out a clear and transparent process for engaging with the sector and students to review definitions of 'positive' outcomes over time and in an evidence-based manner.

**Question 4: To what extent do you agree with the proposed annual publication of separate but consistently defined and presented resources that inform TEF and condition B3 assessments, using the formats that we have indicated (interactive data dashboards, Excel workbooks, data files)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We welcome the transparency, and the regular data updates. However, we would question how this works in practice given the need to provide substantial contextual

information to indicate how judgements related to B3 and TEF have been made and which may not be updated on as regular a basis.

This is particularly the case for data where performance under a B3 threshold has been satisfactorily explained through contextual information. The OfS should consider how to flag and address this in the data they publish.

In publishing this data the OfS has a key role in ensuring that third parties do not misreport or misrepresent information and correctly reflect the statistical uncertainty surrounding this and the need to consider context. The OfS should engage with third parties and produce guidance on the accurate presentation and contextualisation of the data, including accessible guidance for non-specialist users on concepts such as statistical uncertainty and implications for use of data.

## **Questions relating to proposal 2: A common reporting structure for student outcome and experience indicators**

**Question 5: To what extent do you agree with our proposed reporting structure for student outcome and experience measures? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We broadly agree with the proposed approach and breakdowns through the reporting structure.

The OfS should monitor any implications of their proposed approach to present information in a hierarchal structure, particularly for providers that are present in all views or to varying degrees, and those involving partnerships, and where data may not have caught up with changes in provider arrangements with their partner institutions.

**Question 6: To what extent do you agree with our proposed application of these consultation outcomes to the access and participation data dashboard? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We welcome the consistency of definition and outcomes across regulation, whilst maintaining access and participation plan (APP) specific metrics.

We note the OfS's recognition that there may be some marginal impact on the evidence base on which APP targets and milestones have been historically established and monitored. We ask that OfS consider this in future engagement with institutions in respect to their performance against plans.

### **Question relating to proposal 3: Common approaches to the populations of students included in student outcome and experience measures**

**Question 7: To what extent do you agree with the proposed coverage of student outcome and experience measures? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We support the proposals, which will bring coverage of student outcome and experience indicators into close alignment with the definitions and coverage used within the OfS's calculation of student numbers for regulatory purposes. It also provides greater coherence and consistency in approaches, providing there are no issues or negative impacts across the diversity of provision.

Given the lack of clarity on the medium-term approach to measuring outcomes for modular provision, the need for more robust data, and the impact this may have on incentivising providers to scale up provision in this area in advance of implementation of the LLE, we propose that the OfS places a moratorium on inclusion of modular provision in regulation of quality and standards until robust data and meaningful measures can be developed and would like to work with the regulator to achieve this.

We welcome the recognition that transnational education (TNE) provision is an important part of the sector's work but that current data limitations mean it would not be possible to regulate in the same way as traditional mainstream provision.

As such we support the decision to exclude TNE courses from mandatory inclusion. We have convened a group through UUKi to look at monitoring and evaluation tools for TNE provision and look forward to working with the OfS to develop an appropriate model that meets quality standards while recognising the special characteristics of this provision.

## **Questions relating to proposal 4: Common approaches to defining and reporting student populations**

**Question 8: To what extent do you agree with our proposed definitions of mode and level of study? Please provide an explanation for your answer. If you believe our approach should differ, for example to rely on a student's substantive mode of study across their whole course, please explain how and the reasons for your view.**

Different course types often bring distinct characteristics whether that is their learning aims or the students typically studying them. Future extensions to the levels of study or course type needs to be mindful of the burden associated with generating multiple data points and metrics.

We welcome the desire to distinguish between courses at Level 4 and Level 5 and want to underline that students studying at these levels might not have any intention to progress to a Level 6 qualification or managerial or professional employment immediately.

We agree with proposals to identify levels and modes of study in recognition of distinctive characteristics of students and provision, including degree apprenticeships, and the alignment with HESA definitions such as part-time.

We believe that further work is needed to understand how outcome indicators work in relation to these groups, particularly where there is very little or no historical experience of this including postgraduate research, postgraduate taught, higher technical qualifications, and degree apprenticeships. We have set out proposals in respect to specific indicators in our responses to proposals 5, 6 and 7.

**Question 9: To what extent do you agree with our proposed definitions of teaching provider? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We broadly agree with the proposed approach and assignment of teaching provider for each metric which depends on the year the metric is being calculated for.

**Question 10: To what extent do you agree with our proposed definitions of entrant and qualifying populations? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We agree with proposal to report on headcount terms and only once where multiple engagements with institution has taken place in a year. We also agree with the proposed definition of an entrant which is broadly in line with the OfS definitions for new entrant seen in other sector guidance such as the HESES.

## **Questions relating to proposal 5: Construction of continuation measures**

**Question 11: To what extent do you agree with our proposal that continuation outcomes are measured for entrant cohorts? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**



We broadly agree with the proposal to construct indicators in respect to entrant cohorts, rather than later stage of course which would duplicate completion measures. However, we note that some institutions have identified issues with this approach where it does not reflect the mode for the majority of student engagement with the institution. Further evidence on the scale of this issue would be beneficial in deciding whether to support it as a final approach.

Institutions have also reported that as the proposed approach does not match established frameworks across the sector, both within providers and HESA outputs, there is potential for increased burden to providers to replicate and integrate this measure. If they take this approach, the OfS should ensure providers receive necessary technical details and to support them in integrating these measures.

**Question 12: To what extent do you agree with the proposed census dates for measuring continuation outcomes for full-time, part-time and apprenticeship students? In particular, do you have any comments on the advantages and disadvantages of using a one-year census date for part-time measures? Please provide an explanation for your answer, and the reasons for your view.**

In principle, we agree with the proposed census points which are broadly in line with those previously used in measures of completion in the UK Performance Indicators but note that further feedback from institutions may identify areas where the amended approach may cause issues.

Some institutions have expressed concerns around the move to 1 year and 15 days as the census point for non-continuation. They report a lack of time to fully understand how well or not this can reflect the different points of flexibility in re-registration that providers may offer, for example in late registrations.

We strongly encourage the OfS to conduct ongoing evaluation of the approach and allow mechanisms for institutions to feedback issues to the OfS for consideration, particularly given the challenging time scales and substantial level of technical detail included in this consultation which did not allow adequate time to fully consider how the wide range of proposals will impact on provision.

Although the OfS have indicated propensity for non-completion is broadly consistent across modes and levels, we strongly believe that applying these measures to some of the proposed groups under level and mode of study, and breakdowns by split indicators often for the first time, may result in unanticipated issues with distinctive student groups or types of provision

As above, we strongly encourage the OfS to conduct ongoing evaluation of the approach and allow mechanisms for institutions to feedback issues to the OfS for consideration, given we do not think this consultation has been conducted in a way that has allowed the sector to properly consider all potential outcomes.

We do not consider the use of one year census for part-time provision as appropriate and prefer the more tested approach that aligns with that used in the UK Performance Indicators, which are more likely to align with internal university processes for monitoring continuation of part-time students.

**Question 13: To what extent do you agree with the outcomes we propose to treat as positive outcomes for this measure? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We agree with approach for identifying positive outcomes – including the treatment of students who have received a different higher education qualification to the one they commenced as a ‘positive’ outcome– and disagree with alternative approaches to limit positive outcomes to students on the same course, or in same mode or level, as when they started. This will help to incentivise institutions to support students who might want to change their course; and is essential to offering more flexibility to students to adapt study to their personal circumstances.

We also approve of the benefit of the doubt approach taken, given recognised limitations in data.

We note the proposal to exclude students on modules of higher education provision or aiming for awards of higher education credit only from a positive outcome. As noted elsewhere we are asking for a moratorium on regulation of modular provision until we can develop more robust data and meaningful measures for this provision.

However, the OfS should consider the impact of their proposal on those institutions with substantial amounts of part-time provision based on modular study and should consider a tailored approach if needed to avoid unintended negative impacts from use of indicators in these cases.

**Question 14: To what extent do you agree with the proposed approach to student transfers in measures of continuation outcomes? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We agree with the proposal to treat student transfers as neutral at this stage given the lack of robust data, however we recognise the potential disincentive this may present to universities in offering credit transfer, particularly where this may be in the best interests of the student. As elsewhere, the OfS should continue to monitor the impact of their proposed approach and provide ongoing mechanisms for universities to feedback and consider negative implications of definitions.

## **Questions relating to proposal 6: Construction of completion measures**

**Question 15: Do you have any preference for one of the proposed approaches to measuring completion outcomes over the other? Please provide an explanation for your answer. In particular, please describe any strengths and weaknesses of the two methods that inform your preference.**

With changing external impacts on students resulting from the post pandemic period and economic recovery, and potentially significant changes to the student funding system following the government's proposals for post-18 education, we question the assumption that projected measures of completion will continue to correlate with actual outcomes.

We support the use of the more precise cohort tracking measure of completion which better reflects the outcomes of students at providers, and the results of actions that providers may put in place to address this. This also aligns better with the

proposed method for measuring continuation, is simpler for stakeholders to understand and is relatively straightforward for providers to replicate.

Although this measure is less timely, we believe it is important that measures relate to the actual outcomes of performance at providers. We do however note that this measure presents issues in relation to a lag in data, for example where improvement in teaching may take time to show up in data. In recognition of the less timely nature of this measure the OfS should consider applying greater weight to real time contextual information in its use across their regulatory functions.

We note the OfS recognition of data challenges in producing completion measures for credit-based learning and 'step-on, step-off' programme structures likely to result from the governments LLE proposals. As such we propose the OfS should place a moratorium on implementing regulation of outcomes for this provision until robust data is available and there is better understanding of outcomes for this provision.

**Question 16: To what extent do you agree with the definition of the cohort-tracking measure defined within this proposal? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We have concerns with the proposed use of two census points across all levels, particularly for those areas where use of these types of completion measures is untested across providers, such as postgraduate research provision, degree apprenticeships and higher technical qualifications.

It is unclear what the unintended consequences may be of forcing these untested census points on certain types of provision. There is a risk that the short timescales, substantial technical detail, and high volume of material institutions have had to respond to as part of this and other OfS consultations on regulating quality and standards, may result in negative implications not being picked up in responses, particularly those regarding equality and diversity.

The OfS should consider census points and timeframes for the cohort tracking measure in which it is reasonable to expect that students will have completed their course including undergraduate degrees in medicine and dentistry, some architecture courses, and PhDs.

**Question 17: To what extent do you agree with the definition of the compound indicator measure defined within this proposal? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

While providing more timely information, this measure seems overly complicated and may be more difficult to understand in the wider community including non-specialist stakeholders.

## **Questions relating to proposal 7: Construction of progression measures**

**Question 18: To what extent do you agree with the proposal to exclude international students from the calculation of progression measures? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We support the recommendation to exclude international graduates from the calculation of progression measures, based on the very low response rate in comparison to UK domiciled graduates. We encourage the OfS to engage with the sector in any further work to increase the international graduate response rate and incorporate these students into measures in the future.

**Question 19: To what extent do you agree with our proposed approaches to survey non-response (including the requirement for a 30 per cent response rate, and not weighting the GO responses)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We note the OfS assertion that based on previous analysis the overall response rate of the Graduate Outcomes (GO) survey of 50 per cent has reflected wider population characteristics. However, the potentially significant impact of the pandemic and economic recovery on the labour market and graduate employment may change this and risks regulatory intervention taking place because of data that is potentially skewed by a low response rate.

The OfS should keep the use of the GO survey to construct progression measure under close review and work with the sector to evaluate the robustness and accuracy of this measure on a regular basis.

We strongly encourage the OfS to consider greater use of expert independent evaluation of decisions in relation to choices around response rates for inclusion of data in indicators.

**Question 20: To what extent do you agree with our proposed approach to partial responses to the GO survey? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We broadly agree with the proposed approach as it recognises that where a graduate may have attempted to complete the survey, but wasn't able to do so fully, their most important activity would be considered. This also aligns with the approach taken by HESA.

**Question 21: To what extent do you agree with our proposed definition of positive progression outcomes and the graduates we propose to count as progressing to managerial and professional employment or further study? In particular, do you have any comments about the approach to caring, retired and travelling activities, or to employed graduates without a SOC code? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

The GO survey provides valuable information on where students go upon graduation. However, it is not a perfect measure and has a number of limitations:

- It does not capture all the employment outcomes graduates might pursue, and the census date used does not align with non-standard career paths (e.g., in the creative industries).
- There is a risk that the categorisation of jobs may become outdated and miss emerging industries where it is reliant on SOC codes that only update every ten years.
- It does not effectively capture undergraduate students who immediately progress onto postgraduate (taught) study.
- Low response rates mean it only provides a partial picture of student outcomes.

For these reasons, we support its use only alongside relevant contextual information. Given these methodological challenges we also believe weighting of this measure in final judgments should be considered and reduced in favour of other indicators and contextual information.

We approve of the inclusion of any level of further study, caring and retirement in definition of positive outcome, consideration of all graduate activities at the census date and the benefit of doubt approach to defining positive outcomes.

**Question 22: To what extent do you agree with our proposed definition of negative progression outcomes? In particular, do you have any comments on the definition of ‘doing something else’ as a negative outcome when it is reported as a graduate’s main activity? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We disagree with the definition of ‘doing something else’ as a negative outcome which seems inconsistent with the benefit of the doubt approach taken throughout other definitions within the proposed approaches in this consultation.

As it is unclear what activity graduates selecting this response might be engaged in, and in particular whether any of those activities might represent a positive outcome, we feel that a benefit of doubt approach should see this outcome categorised as

positive or neutral for the purpose of consistency with other definitions and approaches used within this consultation.

Failing to do so, without a clear understanding of what activities these responses cover, would for example risk treating those who are about to start work or study as having the same outcomes as graduates that are unemployed.

**Question 23: Do you have any comments on the advantages and disadvantages of the proposed definition of managerial and professional employment? And the alternatives, including using skill levels?**

While the proposed definition of managerial and professional employment offers consistency with those used by institutions and others, we note that previous updates to SOC codes have resulted in 7% of graduates classified as ‘medium-skill workers’ in earlier definitions being reclassified as high-skilled in updated categorisation. As such we propose that the OfS should explore the creation of an additional list of graduate-level jobs to reflect where SOC codes have yet to catch up with changes in the labour market.

We note OfS concerns that bespoke approaches may lead to complex and burdensome definitions but feel that it is important this measure is based on an accurate and robust reflection of graduate outcomes, particularly given the public nature of this information and risks to providers of misrepresenting positive outcomes.

**Question 24: Do you have any comments on our proposed approach to interim activities, and the costs associated with extending the GO survey infrastructure to collect and code more information about interim employment occupations, if we were to pursue an alternative approach?**

We have concerns with the exclusion of interim activity from positive outcomes, particularly where the OfS recognises these may be positive for students.



The timing of the GO survey data collection period in early September, which is a transition point for many graduates, and the 15-month interval between graduation and census means a first 'positive' instance of work and/or study may be completed, indicative of the institution having fulfilled their duty to the individual in their transition from university, but not be recorded as this.

For example, graduates who have just completed a one-year postgraduate qualification and who are about to start a new role or a master's degree, or those working in a Civil Service fast track post since graduation, would count as negative.

Depending on the start date of employment, the proposed approach would classify a graduate as unemployed due to a short gap between completing studies and starting work. There is a risk that this may bias results against certain demographics and professional pathways as they would be perceived to have negative destinations from taking the opportunity to gain further, high-level, qualifications.

To ensure sector confidence in this measure, interim outcomes should be treated as positive or neutral, subject to further work to address the above concerns. We note that extending the survey to include information on graduate's previous employment would incur significant additional cost for the sector and additional burden for graduates completing the survey and therefore, would not be a desirable option.

### **Question 25: Do you have any comments or suggestions on the potential future use of graduate reflective questions?**

We believe that graduate views on their own outcomes are a rich source of information that the OfS must consider. Students must have the agency to decide what is of value to them in relation to their own goals and motivations. It is important that the OfS is interested in the views of prospective, current, and past students. We think the use of graduate views would be particularly useful in the assessment of subjects – where ambitions to progression into employment often vary.

We think the best way to consistently capture this would be through the Graduates' reflections dataset, and support HESAs work in developing robust measures of job quality which more accurately reflect the quality of work achieved based on the work of the Measuring Job Quality Working Group formed following the Taylor Review. The OfS should consider future inclusion of wider measures of job quality within the set of indicators.

We note the concerns that the OfS have raised with use of these measures at this time but ask that this should be formally explored with an aim of contributing to measurement of outcomes in the future. At this time, the OfS should encourage use of graduate reflections as part of the context universities are providing in the B3 assessments and allocate sufficient weight to this.

## **Questions relating to proposal 8: Construction of student experience measures based on the National Student Survey**

**Question 26: To what extent do you agree with the proposed calculation of NSS scale-based student experience measures? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We think the proposed National Student Survey (NSS) scales for use in constructing the student experience indicators provide a good range of the elements we would expect to be included. However, while the NSS remains under review – including piloting alternative question wording and response options – there needs to be further thought given to the longevity of the current proposals.

**Question 27: To what extent do you agree with the proposed approach to NSS survey non-response (including the requirement for a 50 per cent response rate)? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We agree with the proposed approach, based on this being the same methodology as previously used and therefore already partially known by the intended audience of potential students, relevant stakeholders, and universities.

## **Questions relating to proposal 9: Definition and coverage of split indicator categories**

**Question 28: To what extent do you agree with our proposed definition of split indicators showing year of entry or qualification? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

Generally, we support the outlined measures, indicators, and split indicators. In the short-term, the large number of splits will inevitably create a burden for providers as they work through the changes. However, we recognise the future benefit of split indicators which allow for more focused and transparent analysis.

We ask that the OfS monitors and evaluate the burden for providers in managing and dealing with large number of data sets produced by the proposed approach to splitting measures, particularly for smaller providers where this may have implications on staff resources.

**Question 29: To what extent do you agree with our proposed definition of split indicators showing subject studied using CAH2 subject groups? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We agree with the proposed use of CAH2 level subject groups which strikes a balance between not providing too broad a summary, and not increasing complexity with more granular information. The OfS should ensure that there is consistency in use of subject-level data across its functions and that transparent linkages are available alongside published data to allow institutions and other stakeholders to reconstruct data as needed.

**Question 30: To what extent do you agree with the selection and proposed definitions of split indicators for student characteristics? Please provide an explanation for your answer.**

**If you believe our approach should differ, please explain how and the reasons for your view.**

We agree with the principle of including split indicators for student characteristics which mostly fit with what is already in use by institutions. We question the need to include such a wide range of different measures of disadvantage, particularly within published data where this increases the complexity of information to non-technical users, and the burden on institutions to ensure they can monitor and understand the data. For example, complex compound measures covering a wide range of components such as the IMD are used, which will be difficult for non-specialist users to understand.

**Question 31: To what extent do you agree with the selection and proposed definitions of split indicators for course types? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We agree with the proposed course type indicators and welcome the identification of undergraduate with postgraduate features as being a separate means of identification. Further clarity on the approach the OfS may take in identifying foundation years would be helpful.

**Question 32: To what extent do you agree with our proposed definition of split indicators showing provider partnership arrangements? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We broadly support the proposed definition of split indicators showing provider partnership arrangements and disagree with alternative approaches to reflect wider range of provider views such as named pairs of providers which would lead to increased complexity and introduce issues in timely representation of outcomes alongside relevant partner arrangements.

## **Questions relating to proposal 10: Definition and coverage of benchmarking factors**

**Question 33: To what extent do you agree with the proposed definitions of the sector against which English and devolved administration providers will be benchmarked? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We broadly agree with the proposed approach, given the different regulatory powers across the nations. The OfS should clearly set out the details of the approach taken and ensure they make the groups visible.

**Question 34: To what extent do you agree with the benchmarking factors and groups we have proposed for each of the student outcome and experience measures? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

We welcome the use of the geography of employment dataset as part of the benchmark for progression. It is critical that use of indicators accounts for regional differences which will support the efforts universities are making in contributing to local growth and social mobility. For example, the region in which the provider and its students are located, and whether it is a deprived area or an area with high skills needs. If progression data were not benchmarked, it would be likely to penalise providers located in relatively economically disadvantaged regions.

Given that vacancies and salaries vary across the country there is a risk that providers are faced with incentives to work with employers outside of a region if the potential salary return is greater elsewhere. Many providers will have historically built their portfolio of subjects in strategically important areas linked to local employer needs. Given this a provider's context must consider how providers contribute to the local skills system.

We believe it is important to recognise the different starting points of students when considering their outcomes. We strongly support the use of entry qualifications as a factor within the benchmark. Given that the OfS is committed to measuring outcomes, we believe educational gain value added to the individual is important context for explaining outcomes through measures such as learning gain would be beneficial. We recommend that the OfS monitors how this measure is featured in providers' TEF submissions to understand the different approaches and how this can best be captured. We are in our response to the TEF consultation seeking more guidance on this.

Although we agree with the OfS comment in the consultation that they should consult before deciding on an approach for postgraduate benchmarking, it does appear to be a gap in their indicators, particularly when it comes to implementing thresholds for postgraduate programmes.

**Question 35: Do you have any comments on the methodology we use to calculate the ABCS quintiles we propose to use in the benchmarking of student outcome measures?**

No comment

**Question 36: Do you have any comments on the methodology we use to calculate the geography of employment quintiles we propose to use in the benchmarking of progression measures?**

While geographies of employment provide valuable insight into differences faced by various regions in the UK, the methodology that the OfS are looking to use for this is based on 2011 commuter patterns so may not be relevant and reflective of current student patterns, particularly considering the Covid pandemic. We encourage the OfS to undertake further analysis to ensure this measure remains relevant and meaningful in supporting our understanding of student outcomes in the medium term.

**Question 37: Do you wish to make any well-evidenced arguments regarding effects of the COVID-19 pandemic on continuation and completion outcomes, yet to be borne out in the data?**

No comment

## **Questions relating to proposal 11: Presentation of student outcome and experience data indicators and approach to statistical uncertainty**

### **Question 38: Do you have any comments about the opportunities and challenges that result from our presentation of the student outcomes and experiences indicators, and on the effectiveness of the guidance we have provided for users of our data dashboards?**

We support the commitment to transparency in the publication of data, and the data dashboard examples appear helpful in indicating performance against benchmarks and statistical uncertainty (for survey-based indicators). The challenge the OfS will face is that these dashboards cannot account for context, particularly where this may have informed judgments in relation to published data on institutional performance against B3 thresholds and TEF awards.

We support the OfS's proposal to publish information about an individual provider's student outcomes. This data is already available across different data sources and bringing it together through a dashboard helps to ensure providers and the OfS are engaging with the same information. We also believe that publishing this information will help smaller providers who may have fewer resources.

However, as it stands there is not sufficient information about how this data will be contextualised for us to support this proposal

We hope that in publishing this data it would deter third parties from constructing the data which may lead to errors and misreporting. The OfS should engage with third parties and produce guidance on the accurate presentation and contextualisation of the data, including accessible guidance for non-specialist users on concepts such as statistical uncertainty and implications for use of data.

We question the OfS assertion that as they have consulted on presentation of data, there is no need to run dedicated annual processes within which providers are invited to make representations on their data and would encourage them to implement a method for institutions to do so if desired.

We welcome the use and presentation of statistical measures to address statistical uncertainty, and the proposed approach which reflects the underlying ambiguity of true outcomes.

**Question 39: Do you have any comments about the challenges that might result from application of the data protection requirements, suppressing indicators when the denominator contains fewer than 23 students, and when the numerator and denominator differ by fewer than three students?**

It is reassuring that the OfS will implement suppression to address potential data protection breaches due to small populations, and that this will be acknowledged in the use of split indicators and publication of data.

We encourage the OfS to consider greater use of expert independent evaluation of decisions, both in relation to choices for thresholds for data suppression and response rates, and decisions around defining positive outcomes in an evidence-based manner.

**Questions relating to proposal 12: Definition and coverage of data about the size and shape of provision**

**Question 40: To what extent do you agree with the proposed construction of data about the size and shape of provision? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.**

The presentation of further information on the size and shape of the provider and their courses will be provided as additional context to support the analysis of both



indicators and provider and student submissions. This will help to demonstrate the relative weight that the panel might wish to attach to data available via split indicators.