

## Priorities for the Office for Students data strategy

The UK has a world-leading higher education system and the Office for Students (OfS) has a key role to play in its future success for the benefit of students, communities and all UK citizens. The use of information, including data and qualitative intelligence, will underpin how the OfS undertakes all of its regulatory functions. Creating a data strategy which delivers on the risk-based and proportionate approach to monitoring and regulation set out in the regulatory framework will therefore be critically important to the success of the new regulator.

With this in mind, our priorities for the OfS in developing a data strategy are to:

- 1) **Maintain oversight of the sustainability and health of UK higher education**
  - In order to ensure students can continue to benefit from a high-quality education and a rewarding experience under the new regulatory environment, the UK must maintain a sustainable and globally competitive higher education sector with excellent staff, world-class research, links to businesses and local communities, and international partnerships.
  - We therefore welcome the intention for the OfS to undertake a foresight function. This should seek to identify and understand how future challenges and uncertainty on a range of issues, including Brexit, increasing global and domestic competition, the changing policy agenda, and the outcome of the USS reform proposals, may impact on the health and sustainability of the sector.
  - A whole-system approach is needed, recognising the broader purpose that universities serve alongside the provision of teaching and learning, undertaking cutting-edge research, supporting innovation with business and promoting prosperity through leadership in their local and regional communities.
  - Providers should have a role in informing and directing foresight activity based on their experience and the academic expertise within their institutions. We would welcome the opportunity for a range of universities and academic experts to participate on the horizon scanning panel which the regulator is convening. The OfS should also ensure its work does not duplicate that of established research groups but rather draws on existing evidence.
- 2) **Focus on the quality as well as the quantity/timeliness of data**
  - Any data used for regulatory purposes should be clearly sourced, robust and validated, with institutions provided with advance notice and an opportunity to verify and, where appropriate, challenge the data. Academic experts should also be involved in formulating technical and statistical approaches.
  - There is a trade-off between immediacy and quality as data needs to be verified, and numbers will change through academic cycles. Taking frequent snapshots of data on student recruitment throughout the year, for example, is of limited value for foresight purposes given most programmes operate on an annual cycle. There is a risk that such data could be misinterpreted, and the OfS should therefore prioritise seeking data that is fit for purpose over and above the immediacy of data provision.
  - Providers are actively engaging in the development and implementation of the Data Futures programme which aims to modernise and streamline the landscape of data in higher education. It will be important to recognise, however, that data quality will reduce during transition to the new systems being introduced as part of the programme. The resulting

data will therefore be less fit for regulatory purposes at least for a period of time as the new systems bed in. This should be factored into regulatory approaches.

- Any new datasets which the regulator and others may develop should be treated as experimental until they have been sufficiently tested at a national level, and only applied in a regulatory context when they have been verified as robust and reliable.<sup>1</sup> Indeed, providers should have the opportunity to work in partnership in testing and adopting new approaches to reporting and in identifying and developing new data points to report on. Consultation of this kind would help to ensure new data is valuable for the regulator and the sector and would avoid the risk of poorly defined or ill-informed data requests which do not produce useful results.
- We note the recent research conducted on behalf of QAA on the use of social media commentary to predict outcomes from national datasets.<sup>2</sup> QAA recognises that further research is necessary before applying this kind of data in a regulatory context. We would urge the regulator to commission a detailed analysis of the reliability of social media comments at a granular level (for example, at subject/course level and controlling for certain student characteristics). This could be done by an independent body such as the Royal Statistical Society or the Office for National Statistics.

### 3) **Consider provider data in context**

- Focusing simply on performance against lead indicators without understanding the context surrounding a provider's performance would be problematic and could lead to unnecessary regulatory action. Trends in earnings following graduation, for example, can be impacted by regional differences in labour market outcomes but this is not recognised in the Longitudinal Education Outcomes dataset. We would therefore welcome greater clarity concerning how the regulator will balance the use of data with qualitative and contextual information in order to take informed decisions. This will be particularly important with regard to expectations on targets for access and participation, for example, where institutional context including location and demography of the student cohort are important factors.
- There should also be a clear separation between data itself and interpretation of what data shows. For example, in interpreting trends in degree classification over time, the regulator should be careful to distinguish between "grade inflation" and other factors that genuinely affect degree attainment including prior attainment, subject mix, student characteristics, improvements in teaching practice and student engagement, and so on.

### 4) **Provide sufficient lead-time for providers to respond and appropriate transition arrangements where large scale changes are introduced**

- The introduction of the Data Futures programme will require a significant overhaul of existing systems and business process changes for some, if not all, institutions. The amount of time and effort this takes within institutions as large, complex, and decentralised as many universities is consistently underestimated. We would urge the regulator to ensure that these systems are in place before requirements to report more frequently are introduced. Appropriate transition arrangements should apply and these will need to extend beyond 2018/19.

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<sup>1</sup> In this context, we would expect providers to be treated as "eligible recipients" in line with the rules on pre-release covered by the Code of Practice for Statistics: Ensuring Official Statistics Serve the Public", Office for Statistics Regulation (February 2018)

<sup>2</sup> "The Wisdom of Students: Monitoring Quality through Student Reviews" Alex Griffiths, Meghan Leaver and Roger King (June 2018)

- In addition, the regulator should seek to limit the regularity of changes in reporting requirements and always provide sufficient lead-time for providers to respond to new requests.

5) **Take a risk-based approach, delivering a reduction in reporting burden for providers and ensuring value for students**

- Reducing regulatory burden for providers will mean more resource is available for other activities from which students will directly benefit and this should be a core priority for the regulator and the designated data body. The expectation that reporting be “in as near real time as possible” is likely to place considerable demands on institutions, and risks understating the challenges associated with such an approach. The regulator should take a risk-based approach to data reporting recognising the limitations of more frequent data reporting, as above, and committing to stable definitions and simple specifications.
- The data strategy would also benefit from a clear emphasis on the purpose/ benefits of collecting data (both in terms of the specification and frequency of collection). The introduction of new data should be controlled and managed, allowing sufficient time for development and testing, and with a full understanding of the costs and burden including a value for money test from a student perspective.
- In addition, we would support efforts to remove any duplication with other agencies<sup>3</sup> and any redundant reporting. Data reporting should only be required where necessary for regulatory purposes and only where the OfS cannot access the data another way.
- Further clarity is needed on the respective roles of the Higher Education Statistics Agency (HESA) as the designated data body and the regulator itself, with regard to data collection. It should not be necessary for providers to report to both agencies. It would also be useful for the data strategy to establish some principles around the relationship with HESA (for example, where and how changes should be subject to appropriate consultation with providers, and how much licence the designated data body has to interpret or enhance requirements set out by the regulator).
- In articulating the distinction between the roles of the OfS and HESA, it is also important that the responsibility of HESA to the four statutory funding/ regulatory bodies across the four nations is recognised. In some circumstances, the requirements of the four bodies may be entirely aligned and in others, variation in policy and the statutory responsibilities of the bodies may require differentiated data collection, definition or publication frameworks. The relative scale of the bodies must not act as a proxy for primacy in policy development or data requirements.

6) **Support providers to use data being collected to further improve the student experience**

- We would welcome greater transparency on the part of the regulator with regard to data. Providers should have advance sight of the data which will be used to regulate them across the threshold indicators and more widely. This will enable useful dialogue between providers and the OfS and will mean providers are in a better position to address any issues picked up by the regulator.

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<sup>3</sup> Of course, the sharing of any personal information between agencies must be in accordance with data protection legislation, (such as the General Data Protection Regulation) which imposes strict conditions on the processing of personal information.

- Data collected directly by OfS/HESA from students or graduates, in particular, is of primary use to the “owning” institution and should therefore be supplied at a granular level to providers in a timely fashion. This will support providers in the effective use of data to make enhancements to the student learning experience. An objective, qualitative source of data for the “student voice” covering key issues (for example, “value for money”) would be useful for the OfS to explore as well.
- Moving to single data definitions and methodologies would minimise the burden and confusion of different calculations on the same measures (for example, through the UK Performance Indicators vs. the Teaching Excellence and Student Outcomes Framework).

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