Response to the OfS consultation on constructing indicators

General questions regarding this consultation

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

There are no aspects we have found unclear.

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 support using a range of measures in relation to student lifecycle to understand whether students are receiving quality education across the sector.
- The use of student characteristics to ensure equality of experience is welcomed, as is the inclusion of individually defined indicators of deprivation, for example, Free School Meals.
- While the College understands the need for consistent quality among all subgroups, the current approach results in a large number of indicators to consider which risks increasing the data burden on providers. We would ask that the value of the insight given by additional split indicators is weighed against the resources involved in monitoring and interpreting these.

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.

The College supports using existing data collections, given the breadth of data available and the resources involved in collating these. Binary measures will provide meaningful metrics externally and internally and indicate which areas require investigation and interventions.

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.

The College welcomes the comprehensive provision of data on a regular basis. It may be of further use to have these updated as each data source is available, as Graduate Outcomes, NSS and the HESA Student return are available at different times of the year. In versions published, it is important that any contextual information on the results is also made available.

Regarding the format of the data, the provision of a range of formats is informative and helps speak to the different needs across data users internally. The dashboard format is useful, and it would be helpful to have additional visual clarity between B3 and TEF metrics on which aspects of the data should be the main focus for each, given there are slightly different considerations.

In addition, the individualised Excel workbooks/ data files will be useful to tie in the new metrics with other data sources to get a richer understanding of the data, as will the aggregate data files. We would welcome clear guidance on any metrics included in these, and in interpreting the data points included. Additional information on how metrics are constructed in detail as provided with the consultation also provides a richer understanding of the data as well.

For the information published to inform student choice of institution, a different format may be needed, given the relatively high level of data literacy needed to understand the metrics and concept of statistical uncertainty. A particular concern is that this may serve to further disadvantage those without the data literacy themselves, or without access to an informed and data-literate supportive advisor (parent/ guardian/ teacher etc) as they will make a less-informed choice than their peers from more traditional backgrounds.

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.

The current reporting structure shows a large number of split indicators, some of which will have similarities for our student population, and so could be simplified as detailed in our response to question 8.

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.

The College supports consistency where the same metrics are in place, and for different measures and populations to be used where appropriate.

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.

It would simplify the data to show only the taught and registered population combined, where there is little difference between the three populations suggested (taught, registered, and taught and registered).

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.

The College supports defining mode of study by the entry year as a practical solution and one which will be accurate for the majority of our students who tend to keep the same mode of study for the whole course.

Showing the data by level of study is useful given the different experiences between undergraduate and postgraduate students. However, the split between First Degree and Undergraduate with Postgraduate components as currently defined in the proposals is less useful. The College offers a number of integrated masters programmes that have a three year first degree alternative and allows students to transfer between the masters and the first degree courses meaning the lived experience of these "two groups" is very similar. Combining these groups would reduce the number of metrics included without compromising our understanding of the student population.

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.

The College supports the definition of teaching provider based on majority teaching provision which will be consistent across the lifecycle for most of our students.

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.

The College supports the principle of using headcounts which reduces complexity in processing and interpreting the data. Our undergraduate provision is almost exclusively full-time, so counting by headcount is equivalent to FTE for our undergraduate population.

The College would support extending the period in which students can leave and be excluded from the entrant population beyond the 14 days suggested to 28 days. This would allow students a longer period to engage with university support services in order to make a considered and well-supported decision around leaving.

Including new intercalating students in our entrant population would increase the data burden for the benefit of including a small number of students, as the distinction between intercalating students who were previously studying at the College and those new to the College is not noted in current data submissions.

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.

The College supports measuring continuation for entrant cohorts which provides an earlier indication of student success than completion or progression and is a metric which the sector has familiarity with.

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.

Using a one year and 15 days census date for full-time students is broadly consistent with existing methods and is a useful point within a 3 or 4-year course to understand participation, ahead of completion. A one-year census date for part-time students will give us an earlier read of any issues with withdrawal for a cohort, but they will also have had less time studying on their course than their full-time counterparts. We would expect the census date to move in line with any changes to the length of time students can attend and withdraw before being included in the entrant population (see question 10).

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.

The positive outcomes included are useful indicators of success at the early stages of a course, and the consideration of success later in the life-cycle are covered by the other measures included in the indicators of completion and progression, so the current scope of the continuation measure gives useful distinct information from those.

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.

Given that changing course is defined as a positive outcome, it is not clear why changing provider should be viewed as neutral unless there is evidence that this indicates worse outcomes overall for the student. Transferring to a different course can be positive to students in allowing them to find a provider most suited to their needs, particularly for those students who, through various disadvantages, had less information, advice or guidance when choosing an institution.

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.

Following individual cohorts would be advantageous in providing accuracy, but as it creates a lag in the availability of this data and there would then be a delay in seeing the impact of interventions aimed at improving this measure in the metrics. However, we feel this would be outweighed by the advantage of mitigating against one-off issues which would create volatility in data gathered from a single year as in the compound measure.

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.

Given the number of years tracked in this measure are equal to the length of the course in the case of Undergraduates with postgraduate components, and some First Degree courses, it is appropriate to count continuation as a positive outcome in this measure. A more nuanced approach could consider longer courses, such as Medicine, and track these courses for 6 or 7 years, but that would add complexity to the method, and on balance, given the lag already inherent in this approach, 4 years is a pragmatic solution with continuation treated as a positive outcome as well.

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.

The use of cohorts based on entry years is a reasonable proxy to provide data on the varying rates of withdrawal at different stages of a course without the time lag of the cohort-tracking measure. Given that the data is all based on a single year, using 6 cohorts will give a better understanding of the rate for longer undergraduate courses than the 4 years used in the cohort tracking measure. If this measure is used, it would be assumed to be subject to ongoing monitoring of accuracy as it is an experimental measure, and it would be useful to compare the projections to the actual data when available.

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.

It is accepted that there are limitations when using SOC coding for non-UK based employment, however, it is considered that exclusions should therefore be made based on employment location, not student domicile. As an international institution, the College has many UK-domiciled students who go on to work internationally, and many international students who go on to work in the UK.

Question 19: To what extent do you agree with our proposed approaches to survey nonresponse (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 support the need to ensure the data used from the Graduate Outcomes survey is representative and robust. We understand that the weighting has been examined and not considered necessary to make responses representative, and this is also advantageous in simplifying data processing and understanding.

Given lower engagement with Graduate Outcomes is expected compared with the NSS as students are no longer necessarily studying at the institution, this lower response rate is reasonable, as long as it continues to be representative. We would also note that as data collection of Graduate Outcomes is managed centrally, universities do not directly engage students as they did with the DLHE survey and therefore cannot encourage a higher response rate.

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.

Given the small proportion of partial responses it is unclear that the benefits of some of their data would outweigh the risks where they may make up a large proportion of some of the smaller subgroups being reported on. We would welcome further reassurance and clarity on the methods used to define the skills level of employment for these responses.

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.

It is important that the definition of positive outcomes takes into account the aims of each student when enrolling in higher education.

The definition of skilled employment and further study are consistent with our understanding of positive outcomes for the majority of our students at present, but we would be concerned about whether the SOC codes will stay up to date with the evolving jobs market, as historically they have been updated only every 10 years.

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 would prefer that language should be focussed on positive progression outcomes, and that defining certain outcomes as "negative" is subjective and doesn't allow for the different aims of those coming into higher education, and how they may view their outcomes.

Caring responsibilities may hinder entering managerial or professional employment, so it seems that where this is selected as an activity even if not rated as the "most important", which will be defined differently depending on the respondent, this should not be treated in the same way as someone with no caring responsibilities.

It would be useful to gain a better understanding of what the option 'doing something else' covers in order to understand how it should be categorised. If all other options cover all possible activities, it is queried whether this option could be removed, or if further work could be done to understand what is being categorised here.

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?

For the College, the definition of managerial and professional employment is well aligned with the intended outcomes of our courses.

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?

There is concern that those who participate in a further higher education course that ends before the census week will not be deemed to have achieved a positive progression outcome under this approach.

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

With a large enough sample, the reflective questions could add understanding of the fit of graduate activity with intentions and allow for a broader view of positive outcomes based on students' individual aims. However, we would seek careful consideration if these were used, given the subjectivity of these questions which may lead to different responses depending on the respondent for the same outcome.

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.

This is in line with how the results have been analysed previously and the approach is balanced, drawing from a range of questions allowing for variation in responses.

Question 27: To what extent do you agree with the proposed approach to NSS survey nonresponse (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.

The College supports keeping a minimum response rate to maintain robust data. The current assurance on non-responses not impacting representativeness supports using the proposed approach.

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.

The proposed definition of split indicators showing year of entry and qualification are useful in understanding the metrics proposed.

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.

CAH2 is currently used in other sector-wide data exercises such as league tables and is useful for making comparisons between providers. However, it doesn't always align intuitively with the College's internal structure, and this limits the usefulness of this split both for student information and internal evaluation purposes.

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.

The College supports replacing POLAR4 with updated and more relevant measures; postcode measures can mask disadvantages and the inclusion of more individualised measures such as Free School Meal eligibility will improve the identification of disadvantaged students.

It may be less relevant to categorise postgraduate students using area-based measures of disadvantage; as they are likely to have moved from their "formative" childhood home, at the least it calls into question which address should be used to assess their level of disadvantage.

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.

Please see the comment on question 8 regarding the level of study definitions.

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.

Given we have very few partnership arrangements, this has little impact on the College.

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 support using the full set of providers for a comprehensive set of data for each benchmark and keeping the set consistent between TEF and B3.

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.

The College supports a well-evidenced approach that has prioritised factors with the largest effects on outcomes.

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?

We support the inclusion of an intersectional measure which provides a richer understanding of the student population.

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?

We don't have any comments to make on this at this stage.

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?

We don't have any comments to make on this at this stage.

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?

Displaying the confidence as well as the indicators and benchmarks gives useful context to the data. The dashboards and guidance work well for HE providers in understanding the data, but as detailed in our response to question 4, there is concern about the same format being used as a tool for student choice; the level of data literacy required to interpret the metrics and statistical uncertainty risks advantaging those from more advantaged backgrounds.

With the current guidance, there is some difficulty in understanding the exact point at which a provider would be considered by the OfS as being at risk. However, the inclusion of contextual information in the process is important and useful.

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?

We understand the difficulty in balancing the need to have performance indicators for those who are poorly represented in higher education and the need for data privacy. However, we are unclear on why there would be a need for additional suppression related to Free School Meal indicator data, given the current suppression thresholds are suitable for protected characteristics, and the proposed approach may result in suppressing a meaningful indicator.

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 College supports this proposal, it provides useful contextual information for providers and assessors.