

Consultation on constructing student outcome and experience indicators for use in Office for Students regulation

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) represents nearly 22,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes the opportunity to contribute to this consultation. Many of our FE college members lead institutions which include higher education, regulated by the Office for Students, and we have sought their views.
3. We are not fundamentally opposed to the idea of numerical dashboards, and the dashboard using numerical thresholds proposed by the Office for Students in this consultation is clearly well-researched. However, the proposed dashboard is complex and we feel strongly that, unless providers can fully understand how each of the methods are applied to their organisation and students, and how these methods relate to the definitions proposed, they cannot be expected to improve their outcomes.
4. Our concern, as expressed in this consultation response, is that the approach proposed is overly complex and may force organisations to focus more on improving data (for the sake of reputation as reflected in their dashboards) than on improving experiences and outcomes for their individual students.
5. ASCL believes, as set out in our [Blueprint for a Fairer Education System](#), that education providers cannot be expected to solve deep-seated social and economic inequalities in society as a whole, and therefore any attempt to make them accountable for disadvantage in the wider society is unhelpful. In addition, we believe that major changes should only happen if we are confident that the benefits we will achieve are worth the disruption.

B. Key points in answer to questions set out in Annex G

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.

Yes. It is not clear why numerical measures take precedent over qualitative measures in the proposals when the qualitative measures are subjective.

Question 2: In your view, are there ways in which the objectives of this consultation (as set out in paragraph 7) could be delivered more efficiently or effectively than proposed here?

Yes. Some of the measures, such as those for access, completion and achievement, can be and are already measured by the providers of higher education themselves. Others, such as student views and progression, which are more subjective, are often collected by third parties. These issues can be measured or mis-measured in different ways. Providers of higher education do not necessarily have control over numerical measures and therefore to hold them account for something they cannot necessarily control is unfair.

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.

Disagree. The proposed wording will enable the Office for Students to use numerical indicators to judge provider outcomes but this does not necessarily mean that the outcomes and experience indicators being proposed will provide true indicators of quality of provision. Dashboard data may also be inappropriately used to reflect positively or negatively on providers.

To ensure condition B3 wording is met in its entirety, we believe a greater number of indicators, both objective and subjective, should be used.

Questions relating to proposal 2: Constructing indicators to assess student outcomes

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.

Disagree. We agree that any measures ultimately used should inform the TEF, but the measures proposed are too complex to offer a measure of course quality.

An alternative proposal may be to collect a variety of data and stakeholder perceptions on institutions deemed to be delivering high quality over time, and to set thresholds based on the data provided.

Questions relating to proposal 3: Setting numerical thresholds for student outcome 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.

Neither agree nor disagree. The proposed approach is reasonable, but this approach does not necessarily mean the numerical thresholds proposed will measure quality in courses within these groupings. They rather measure a range of characteristics, some of which may relate to quality of the student experience.

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.

Neither agree nor disagree. See our answers to questions 4 and 5 above. We do not agree that setting numerical thresholds for student outcomes is the best measure of quality in the student experience.

Questions relating to Proposal 4: Publishing information about the performance of providers in relation to the Office for Students numerical thresholds

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.

Disagree. The numerical data on each provider's student outcomes and performance could be subject to error and should only be published when the provider agrees the data is accurate.

Questions relating to Proposal 5: Making judgments about compliance with condition B3, including consideration of context

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.

Agree. The definition of modes of study and level of study are well used in the sector and well known by students.

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.

Agree. This definition recognises the complex nature of HE partnerships.

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.

Agree. These definitions reflect the wide-ranging populations in the various cohorts of students.

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.

Agree. We accept that entrant cohorts are the base population from which to analyse student experience, but data on student continuation outcomes is already collected by HESA. Therefore, it is not clear why these outcomes need to be collected again by the Office for Students. It is also not clear whether this approach will effectively capture continuation data for those students who progress on part-time and mixed mode basis.

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.

Agree. The proposed census dates for measuring continuation outcomes seem sensible, but we are concerned about what is being measured at this stage that is not already measured in other ways.

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.

Disagree. The proposal for positive outcomes seems to rely on a student remaining on their original course of entrance whereas, in some cases, it is positive for students to change course and provider altogether.

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.

Neither agree nor disagree. The approach to student transfers works in the example given. It may not work in other examples, such when a student makes a change of course, year of study and provider.

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.

No. We are concerned about all the measures being proposed for completion outcomes.

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.

See the answer to question 15 above. We are concerned that cohort tracking will not take account of the positive completion of students who transfer in and out of institutions and courses.

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.

See the answer to question 15 above. This is a complex approach to measurement and may be subject to misunderstanding by 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.

Disagree. If the progression measure is used with one group of students, then it should be used for all groups, including international students.

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.

Agree. This seems a reasonable approach to collecting students' responses. However, students do not always prioritise such surveys for a number of reasons, and this may be nothing to do with the quality of the course they attended.

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.

Disagree. The approach may skew the overall data set for a provider.

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 (including those caring, retired and travelling, a 'doing something else')? Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.

Agree. This is a method previously used to define progression outcomes, which is helpful, but it widens the definition and does not necessarily help to clarify quality 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.

Disagree. The definition of 'doing something else' is no more a negative outcome than those mentioned when defining positive progression outcomes. The 'doing something else' may be a positive outcome for the student at that time.

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?

Disagree. The proposed definition of managerial and professional employment is too narrow a definition by which to map employment. It is also not helpful if graduates are due to start a job soon and this is not counted. There are many reasons why graduates defer taking up employment in their chosen career immediately on graduation, some of which are to do with job availability.

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?

Disagree. Interim activities may be very important to the future career and experience of someone who has graduated or may return to study to graduate.

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

Yes. While the consultation recognises the limitation of these questions which ask graduates to reflect on their future, this measure is still proposed. This seems unhelpful.

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.

Disagree. Whilst the NSS provides some useful information, it should not be relied on to provide threshold evidence of the student experience. Different people may respond differently to questions in the way they are asked in the NSS.

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.

Disagree. The NSS survey non-response rate and the requirement for a 50% response may not fully reflect course quality when small numbers are involved.

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.

Disagree. The definition of split indicators showing the year of entry or qualification is very broad, and data on some of these split indicators, such as ethnicity or gender, could be collected elsewhere.

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

Agree. The CAH2 subject groupings are known and understood by providers.

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.

Agree. The definition for the split indicator for student characteristics is understood.

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.

Agree. The approach proposed seems a reasonable one as it recognises that course types are complex and do not necessarily lend themselves to comparisons in quality.

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.

Agree. This makes sense and will pick up data where subcontracting some or all of the provision which is validated by one organisation and taught by another.

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.

Agree. It makes sense to treat English and devolved administration providers in the same way.

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.

Agree. The level of study and cohort year should be benchmarked together, although the reasons for variations in cohort numbers at each level of study should be taken into account.

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?

Yes. It seems overly complex and partial.

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?

No.

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?

Yes. Evidence from the Education Policy Institute found that those from disadvantaged areas and those with disabilities have been disproportionately impacted by Covid. This may well have impacted, and continue to impact, on their HE experience, completion levels and outcomes on completion.

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?

Yes. The proposal to use numerical thresholds to reflect quality of student experience and outcomes is not necessarily the only way to capture information about quality. The proposed method seems overly complex.

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 185

Yes. The application of data protection requirements may limit the value of the data collected and its usefulness in benchmarking numerical thresholds.

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.

Neither agree nor disagree. While the construction of data about the size and shape of provision offered by individual institutions is interesting, it does not clarify the quality of student experience and may not give an accurate impression of small providers where provision is specialist but nevertheless of high quality.

C. Conclusion

6. While we understand that the proposed approach will inform the TEF, we feel that this approach is overly complex, may lead to competitive behaviours that are not in the best interests of students, and will make it difficult for providers to clearly see the overall impact of their actions against each of the measures in their quality grading.

7. We accept that some HE providers may find the proposed approach helpful. However, providers with a mixed economy (further and higher education) are likely to find the proposed measures overly complex. This in turn may mean that they feel they have less control over the overall outcome, with less scope to improve quality against the thresholds proposed.
8. We hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that we can.

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