

# British Academy response to the Office for Students' consultation on a New Approach to Regulating Student Outcomes

17 March 2022

## Background

This consultation is one of three linked consultations the Office for Students (OfS, the regulator of higher education in England) is conducting on its approaches to regulating student outcomes and to the Teaching Excellence Framework (TEF). The Academy has responded to all three consultations. This response is to the consultation on a new approach to regulating student outcomes. There are areas of overlap between all three consultations and, where appropriate, these responses reference each other.

A significant proportion of the consultation on a new approach to regulating student outcomes is concerned with condition B3 for provider registration. While we support efforts to improve access and participation for all groups, we do not consider it the place of the British Academy to respond to questions relating primarily to the regulation of providers. As such, the response set out below is restricted to those parts of the consultation which focus on constructing indicators to assess student outcomes.

The text-based responses are accompanied by a tick-box selection to indicate whether or not respondents agree with the proposals. These options are: Agree, Disagree, Don't Know.

## Response

### Questions relating to Proposal 2: Constructing indicators to assess student outcomes

Question 4. Do you agree or disagree with the proposals for how we will construct student outcome measures? Do you have any alternative suggestions?

- **Disagree**

The British Academy disagrees with the proposals for constructing student outcome measures. Much of the below is captured in our responses to the consultations on 'Constructing student outcome and experience indicators for use in Office for Students regulation' and on 'the Teaching Excellence Framework' but is recorded here for clarity and emphasis.

**The Academy disagrees with the proposed approach to measure progression to managerial or professional jobs at a census point of 15 months after graduation, based on responses to the Graduate Outcomes (GO) Survey.** As stated in paragraph 15 of Annex B, respondents to phase one of the consultation – on use of GO survey responses to construct progression measures – expressed concerns that: 'a census point of 15 months is too soon to measure whether students would progress to managerial or professional jobs. Others suggested that current survey response rates mean that it is not representative of student outcomes'. The Academy shares this view that a census point of 15 months, while a considerable improvement on the six-month census point of the previous Destination of Leavers from Higher Education (DLHE) survey, is still unlikely to produce an accurate representation of graduate outcomes as it may not capture the diverse career pathways and progressions of graduates who do not quickly enter what is classified as 'managerial and professional employment'.

The range of employment destinations and options for graduates from SHAPE (Social Sciences, Humanities and the Arts for People and the Economy) are explored in our publications *The Right Skills* and *Qualified for the Future* whose research concluded that SHAPE graduates are as employable as those from other disciplines and that differences in pay between SHAPE graduates and graduates of other disciplines decrease in scale over time.<sup>1</sup>

**The Academy disagrees with the proposal to not make use of graduate reflection questions in the GO survey.** While we acknowledge the Office for Students' rationale that low-response rates to these questions pose difficulty, we believe that the questions provide important supplementary information which should be considered when considering graduate progression. As stated in paragraph 23 of Annex B, phase one consultation respondents also commented that: 'students' motivation for entering higher education may not be solely about achieving a managerial or professional employment outcome and that progression is something over which providers have insufficient influence'. The Academy agrees with this assessment and encourages the OfS to construct indicators which capture the full and diverse picture of higher education.

**The Academy has reservations concerning the use of the term 'managerial or professional employment'** based on the Office for National Statistics (ONS) Standard Occupational Classification (SOC) 2020 major groupings (groups 1-3), when constructing student outcomes and progression indicators. We are concerned that the proposed description is a narrow one and potentially exclusionary of some areas of employment which many graduates from SHAPE

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<sup>1</sup> British Academy (2020), *Qualified for the Future: Quantifying demand for arts, humanities and social science skills* and British Academy (2017), *The Right Skills: Celebrating skills in the arts, humanities and social sciences*.

subjects may enter into – such as performing arts – and of the many other ways in which these graduates contribute to society and the economy.

**The Academy remains concerned about the level of emphasis placed on teaching quality in delivering positive outcomes.** As noted in the Academy's 2019 response to the Independent Review of the TEF and our response to the current consultation on the TEF, it is not at all clear that employment outcomes measure teaching quality or factors within the control of a provider, so much as factors including the prior skills and knowledge of students, their socio-economic background, sex and ethnicity, the reputation of a provider and its geographical location, networking and other activities which students may engage in during the course of their studies, their subject choice, government macroeconomic policy, and the general performance of the economy.<sup>2</sup> The proposals in paragraphs 82-91 to include some of these aspects as they relate to students' characteristics for use as split indicators for continuation, completion and progression outcomes, goes some way to addressing this, but we feel that there are still more aspects that should be taken into account.

The Academy has further articulated its concerns regarding assumptions about what constitutes 'positive outcomes' and the proposed definition of managerial and professional employment, in our responses to the consultation on constructing student outcome and experience indicators for use in OfS regulation.

**The British Academy does agree with the proposals to consider any form or level of further study as a positive outcome for students.** Our work on the career pathways of postgraduate research students, and the accompanying case studies, set out the range of employment opportunities for postgraduate research students in SHAPE disciplines, as well the higher-level skills that they develop during the course of their further studies.<sup>3</sup>

**The Academy also supports the proposal to consider performance at subject level,** but this must consider the differences that exist across different subjects and should not negatively and unfairly impact those graduates from SHAPE disciplines. We have previously raised concerns about capturing interdisciplinary teaching - which is so critical for addressing global challenges – and the potential for subject-level performance measures to disincentivise providers from adopting creative and innovative programmes.<sup>4</sup>

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<sup>2</sup> The British Academy (2019), *Response to the Independent Review of the Teaching Excellence and Student Outcomes Framework (TEF)*.

<sup>3</sup> The British Academy (2020), *Good Practice in Providing Careers Guidance for Postgraduate Research Students*.

<sup>4</sup> The British Academy (2018), *Teaching Excellence and Student Outcomes Framework: Subject-level. A submission from the British Academy*.