

British Academy response to the Office for Students' consultation on constructing student outcome and experience indicators for use in Office for Students regulation

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 focuses on the construction of student outcome and experience indicators that will inform the OfS's regulatory approaches to the TEF, student outcomes, and access and participation. There are areas of overlap between all three consultations and, where appropriate, these responses reference each other.

The British Academy previously responded to the OfS' consultation on regulating quality and standards in higher education, conducted in early 2021.¹ The response to this consultation draws on and repeats points from this previous response, the Academy's responses to the concurrent consultations on regulating student outcomes and the TEF, as well as the Academy's previous consultation responses on matters pertaining to the TEF and the regulation of higher education in England, including our response to the Independent Review of the TEF.²

¹ British Academy (2021), *Office for Students consultation on regulating quality and standards in higher education*.

² British Academy (2019), *Response to the Independent Review of the TEF*.

Given the Academy's role as the national academy for the humanities and social sciences, we are responding to the questions in the consultation that have a direct impact on the ongoing health and vibrancy of the disciplines within our remit.

Response

Questions relating to proposal 1: Common approaches to the construction of student outcome and experience indicators

[Note: this proposal focuses on how the OfS is proposing to use consistent definitions across the data that supports its functions for access and participation and quality and standards, to ensure coherence across different aspects of the student outcome and experience indicators it intends on constructing.]

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.

Our previous responses to the OfS consultation on regulating quality and standards in higher education³ and the independent review of the TEF⁴ highlight the importance of the use of contextual information alongside specific measures to fully understand provider and student behaviour, and the risks associated with setting numerical-level baselines for the sector.

While we understand the OfS's approach to constructing binary measures is aligned with its general duties under Section 2 of the Higher Education and Research Act, the use of contextual information alongside these measures will help instil confidence in their use. We recognise that the OfS will consider evidence from providers to understand "why outcomes achieved by particular students, which do not satisfy the OfS's definition of a positive outcome [but] may nonetheless constitute a positive outcome for those students" (paragraph 43 of the consultation document), which is welcomed.

Setting baselines based on binary measures without additional consideration for the context in which providers and students operate could lead to unintended consequences that would disadvantage underrepresented groups, or impact providers' ability to offer students a diversity of provision that meets the needs of the UK's knowledge economy.

Questions relating to proposal 5: Construction of continuation measures

[Note: this proposal focuses on how the OfS will define and construct the continuation measure that will be used in its regulatory and TEF assessments, and in its access and participation data dashboard. It is proposing that continuation be measured based on the percentage of students continuing to study for a higher education qualification one year and 15 days (full-time/apprenticeship) or two years and 15 days (part-time) after commencing their studies.]

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.

³ British Academy (2021), *Office for Students consultation on regulating quality and standards in higher education*.

⁴ British Academy (2019), *Response to the Independent Review of the TEF*.

We understand the approach outlined in the consultation document to track outcomes based on entrant cohorts, as it will provide data on student activity in the early stages of their studies. However, a continuation measure does not tell the complete story of a student's journey through higher education.

Several factors, including prior skills and knowledge of students, their socio-economic background, and other activities students undertake during their course, as well as the wider motivations of students studying in higher education, such as passion for a particular discipline, ambition to make a positive difference, solving difficult challenges and learning constantly, may impact the way in which students continue to study to obtain a higher education qualification.⁵

Given that institutions and courses will attract different students who may bring these factors to bear on their studies, contextual information should be considered alongside the calculation of continuation outcomes to fully understand possible student trajectories.

Questions relating to proposal 7: Construction of progression measures

[Note: this proposal focuses on how the OfS will define and construct the progression measure that will be used in its regulatory and TEF assessments, and in its access and participation data dashboard. It is proposing that "the proportion of [UK-domiciled] students progressing to managerial or professional employment", based on responses to the Graduate Outcomes survey, be the main reference point for this measure – though the consultation document and questions blow elaborate on other outcomes that may be deemed positive, neutral, or negative.]

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 recognise the useful information provided by the Graduate Outcomes (GO) dataset on the contribution of higher education graduates to society and the economy following the completion of their studies.⁶ However, the statistics made available through the GO survey continue to be identified as experimental, and the census point at which the GO survey is conducted - 15 months after graduation – may not capture the diverse career pathways of graduates who do not enter what is classified as 'managerial and professional employment' immediately following graduation, if ever.

While we recognise that the census point is later than that used in the Destination of Leavers from Higher Education (DLHE) survey - which the GO survey replaced in 2018 – it is still a snapshot of graduate outcomes. British Academy research has shown that ten-years post-graduation the gap in earnings between broad subject groups narrows. While starting salaries are lower, over the longer-term graduates of SHAPE disciplines (Social Sciences, Humanities and the Arts for People and the Economy) make strong progress up the career ladder into roles attracting higher salaries.⁷ As such, additional contextual information, such as the evidence submitted by providers as part of their TEF submissions, needs to be considered to fully understand the progression of graduates following their higher education studies. This context will continue to be valuable when the statistics from the GO survey are no longer identified as experimental.

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

⁵ British Academy (2019), *Response to the Independent Review of the TEF* and British Academy (2022), *SHAPE Skills at Work: Case studies from SHAPE graduates* (forthcoming).

⁶ British Academy (2021), *Office for Students consultation on regulating quality and standards in higher education*, response to question 2b.

⁷ British Academy (2020), *Qualified for the Future: Quantifying demand for arts, humanities and social science skills*.

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 Academy disagrees with the approach taken by the OfS to define positive progression outcomes.

This consultation sets out assumptions about what constitutes 'positive outcomes' that we believe cannot be substantiated. Destinations upon completion of study are not the sole positive outcomes available to graduates. For example, the broad underlying set of skills SHAPE graduates acquire through their studies can create value in multiple work roles and environments, and higher levels of education can lead to greater civic engagement, better wellbeing and quality of life, as well as increased productivity.⁸ The motivations to attend higher education are also more expansive than financial gain or landing a specific type of job role. While students are motivated to obtain a degree to pursue career opportunities that will provide them with stability, they are also driven their interest and passion in a specific subject, the ability to become more independent through the experience provided by higher education, the ambition to make a positive difference, and an intellectual curiosity about different societies and perspectives.⁹

The Academy continues to consider quantitative measures of student outcomes in relation to graduate destinations to be problematic, as they are dependent to a large part of factors unrelated to the quality of an individual's higher education course.¹⁰ In addition, student outcomes are the product of several factors, including institutional reputation and location; the sex, ethnicity, and socio-economic background of the student; and government policy and the performance of the economy at the time of study and graduation.¹¹ Destinations are therefore of limited value in assessing the quality of a course from which an individual graduated. While we acknowledge the consultation's references to the complexities associated with linking to the Longitudinal Education Outcomes (LEO) dataset for the purposes of constructing progression measures, allowing for the incorporation of additional context available through this data, including regional outcomes, will provide a more comprehensive and accurate assessment of progression outcomes, even if this requires a delay to the calculation of progression outcomes.

We welcome with the consultation's proposed approach to broaden the category of positive outcomes to include further study. In addition, the recognition that activities such as travelling or caring duties are used to expand the definition of a positive outcomes reflects a wider range of possible motivations that students have for study, as well as the diverse circumstances graduates may face after the completion graduates of their studies.

Our response to question 23 further elaborates on the challenges associated with the definition of managerial and professional employment the OfS is proposing to use as part of the measurement of progression outcomes, which may not fully reflect the types of roles graduates are likely to hold at the GO survey census date 15 months after they were awarded a higher education qualification.

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?

⁸ 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*.

⁹ Unite Students, in partnership with the Higher Education Policy Institute (2019), *The New Realists* and British Academy (2022), *SHAPE Skills at Work: Case studies from SHAPE graduates* (forthcoming).

¹⁰ British Academy (2021), *Office for Students consultation on regulating quality and standards in higher education*, response to question 2a.

¹¹ Belfield et al (2018) *The relative labour market returns to different degrees* Institute for Fiscal Studies.

Please provide an explanation for your answer. If you believe our approach should differ, please explain how and the reasons for your view.

The Academy disagrees with elements of the approach taken by the OfS to define negative progression outcomes. Our main objection to this approach pertains to the classification of 'doing something else' as a negative outcome. While we understand the considerations outlined in the consultation document regarding the challenges in interpreting the outcomes of graduates reporting 'doing something else', the proposed approach may result in some activities where graduates are making valuable contributions to society and the economy counting as negative outcomes.

As indicated in our response to question 21, destinations are of limited value in assessing the quality of a course from which an individual graduated, as student outcomes are the products of several factors. Our response to question 23 further elaborates on the challenges associated with the definition of managerial and professional employment the OfS is proposing to use as part of the measurement of progression outcomes, which may not fully reflect the complexity of the labour market and the types of roles graduates are likely to hold at the GO survey census date 15 months after they were awarded a higher education qualification.

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?

The Academy disagrees with elements of the definition of managerial and professional employment the OfS proposed to use for this outcome.

The use of the Standard Occupational Classification (SOC) 2020 major groups 1 (managers, directors and senior officials), 2 (professional occupations) and 3 (associate professional occupations) to determine whether a graduate is in managerial and professional employment, appears to capture many of the types of role graduates – including those of SHAPE subjects– may hold 15 months after being awarded a higher education qualification. However, while SOC2020 has corrected some abnormalities regarding occupational classification, many will remain given the complexity and diversity of the job market.¹²

We acknowledge the considerations outlined in the consultation document regarding the limits of a standard classification in reflecting the nuances of individual occupations (paragraph 264), as well as the challenges of using alternative methods, such as Elias and Purcell's classification of graduate occupations and Green and Henseke's analysis (paragraph 266), which we referred to in our response to the consultation on quality and standards (question 2a). However, the proposed definition of managerial and professional employment should also reflect employment in roles and sectors that may not necessarily fit within SOC 2020 major groups 1-3, as well as the ways in which graduates of higher education are contributing to society and the economy. For example, roles in unit group 4112 (national government administrative occupations), may not require a higher education qualification upon entry, although, as indicated in the ONS SOC hierarchy, "many entrants are graduates".¹³ The current definition of managerial and professional employment would not capture the contributions a graduate holding a post in this group may be making as part of their work, or how their current post may lead to progression opportunities.

SHAPE graduates are employed in roles across a diverse range of sectors, including from financial services to the creative industries, education, health, manufacturing and construction. Although there are exceptions for discipline-specific routes, most SHAPE education and training is also not

¹² British Academy (2021), *Office for Students consultation on regulating quality and standards in higher education*, response to question 2a.

¹³ Office for National Statistics (2021), ONS SOC Hierarchy, [Unit Group 4112](#).

designed to prepare students for one specific career direction.¹⁴ SHAPE graduates are just as likely as graduates of other disciplines to be resilient to economic shocks and are more likely to be flexible and adaptable in moving between roles and sectors.¹⁵ This resilience will serve SHAPE graduates well in a society and economy that continues to evolve as we recover from the COVID-19 pandemic. While starting salaries are lower, over the longer-term graduates of SHAPE disciplines also make strong progress up the career ladder into roles attracting higher salaries, and the differences in pay between SHAPE graduates and graduates of other disciplines decrease in scale over time.¹⁶

While we understand the OfS's concerns regarding the potential complexity and burden in accounting for the diversity of graduate employment outcomes, the variety of graduate pathways requires the consideration of relevant contextual information, alongside relevant data points, to fully understand progression outcomes. Such an approach will help ensure provision in the full range of disciplines which the UK needs to create a thriving knowledge economy, maintain a vibrant creative industry, and protect the strong services sector, is encouraged and maintained, and in doing so offer choice to students from all backgrounds.

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

We acknowledge the considerations outlined in the consultation document regarding the challenges in incorporating data related to graduate reflections on their activities, based on the reflective questions in the GO survey. However, given the wider motivations of graduates in pursuing study and career pathways, such as passion for a particular discipline, ambition to make a positive difference, solving difficult challenges and learning constantly,¹⁷ data on graduate reflections may be useful in further understanding progression outcomes.

As the survey matures, we would encourage further exploration of the use of this data as part of any progression outcome measure, as indicated in our response to the OfS's previous consultation on regulating quality and standards in higher education¹⁸, in consultation with providers, who would be impacted by the potential burden of such a change. The use of this data could incorporate useful information about other aspects of the contribution higher education makes to the roles graduate take in society and the economy, such as job satisfaction and the use of skills learned, within progression measures.

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

[Note: this proposal focuses on how the National Student Survey (NSS) will be used to construct student experience measures linked to the TEF.]

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 remain sceptical of the value or reliability of the NSS for the purpose of assessing teaching quality. The NSS questions are a measure of student satisfaction, which often does not provide relevant or reliable information to measure the quality of programmes, as it represents nothing more than a snapshot of student feedback at a single point at the end of a degree. A degree of

¹⁴ British Academy (2020), *Qualified for the Future: Quantifying demand for arts, humanities and social science skills*.

¹⁵ Ibid.

¹⁶ Ibid.

¹⁷ British Academy (2022), *SHAPE Skills at Work: Case studies from SHAPE graduates* (forthcoming).

¹⁸ British Academy (2021), *Office for Students consultation on regulating quality and standards in higher education*, response to question 2b.

flexibility in any metrics used to assess teaching quality must be present, and the contextual information made available alongside the calculation of these measures must be considered in order to fully understand.¹⁹

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

[Note: this proposal focuses on how split indicators, which will be used to provide further breakdowns within each combination of student outcome or experience, mode, and level of study, will be defined and constructed. The consultation questions pertaining to this proposal are more focused on definitions of aspects of the split indicators and coverage.]

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 definition of split indicators showing subjects studied using CAH2 subject groups, as these are used consistently across the sector, and as indicated in the consultation document, would provide an appropriate level of information while addressing challenges related to utility of information.

With specific consideration to disciplines within our remit, we understand the OfS's proposed approach described at paragraph 338 of the consultation document, on the aggregation of CAH19-02 (Celtic studies) with CAH19-04 (Languages and area studies).

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 selection and proposed definitions of split indicators for student characteristics. The availability of data across the characteristics that will be used to construct the split indicators is well established within the higher education datasets, and the Academy has previously supported this position.²⁰

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

[Note: this proposal focuses on the definitions and methodology related to the benchmarking that will be used on regulation of student outcomes and the TEF, which builds on how the OfS has used benchmarking in its activities to date. Benchmarking of provision at undergraduate levels of study will continue.]

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?

¹⁹ British Academy (2019), *Response to the Independent Review of the TEF*.

²⁰ British Academy (2021), *Office for Students consultation on regulating quality and standards in higher education*, response to question 2e.

The British Academy was asked by the Government Office for Science to produce an independent review on the long-term societal impacts of COVID-19.²¹ Reporting in March 2021, the evidence report outlines the ways in which the pandemic has – and will continue to have – social, economic and cultural impacts over the long-term. It also provides evidence on the effects, risks, challenges and opportunities to consider as these impacts are addressed. This review is accompanied by a separate policy report which considers how policymakers may respond to the societal impact of the pandemic.²²

Section 4 of the evidence review, which focuses on knowledge, employment and skills, may be of particular interest in relation to this consultation, as it provides evidence on how the pandemic has impacted – and will continue to impact – continuation and completion outcomes. On continuation outcomes, Ofqual's approach to grading exams and assessments for 2022 is continuing to reflect the disruptions students have experienced in their education over the course of the pandemic, by providing measures such as a grading safety net.²³ Linked to this, the Academy's evidence review notes the ongoing impact of the pandemic on student recruitment, given the impact of student attainment on grade requirements, pathways and institution choice. Higher overall grades could have an impact on university continuation rates, as a student's risk of being 'overmatched' to a university may increase.²⁴

The ongoing health and economic consequences of the pandemic could also continue to impact the completion outcomes for vulnerable and underrepresented groups who were found to have experienced greater disruption in academic activity.²⁵

As the pandemic's changing effects on employment and the economy continue to be understood, the current and ongoing challenges graduates may face upon entering the labour market must also be considered in relation to progression measures. While the UK's GDP "was estimated to have equalled its pre-coronavirus pandemic level" in December 2021, sectoral contributions to GDP growth continue to vary, with "services [being] the main contributor to the GDP's 0.2% fall in December 2021."²⁶ The pandemic had resulted in a large decrease in the number of young people aged 16-24 in employment, and for those in employment, entering the labour market during a recession depresses an individual's earnings and employment for up to 10 years.²⁷ The unequal economic consequences of the pandemic across places and sectors may continue to impact the number and type of employment opportunities graduates are able to access upon completion of their studies.

This evidence highlights the importance of the use of contextual information by the OfS alongside continuation, completion and progression measures, to better understand the long-term impacts of the pandemic on education and to ensure these impacts are reflected in its approaches and activities.

²¹ British Academy (2021), *The COVID decade: Understanding the long-term societal impacts of COVID-19*.

²² British Academy (2021), *Shaping the COVID decade: Addressing the long-term societal impacts of COVID-19*.

²³ Ofqual (2021), *Ofqual's approach to grading exams and assessments in summer 2022 and autumn 2021*.

²⁴ Campbell, S., Macmillan, L., and Wyness, G. (December, 2019), Mismatch in higher education: prevalence, drivers and outcomes, Nuffield Foundation.

²⁵ Day, T., Chang, I. C. C., Chung, C. K. L., Doolittle, W. E., Housel, J. and McDaniel, P. N. (2020), 'The immediate impact of COVID-19 on postsecondary teaching and learning', *The Professional Geographer*, 73 (1), pp.1-13.

²⁶ Office for National Statistics (2022), *GDP monthly estimate, UK: December 2021*.

²⁷ Oreopoulos, P., von Wachter, T. and Heisz, A. (2012), 'The Short- and Long- Term Career Effects of Graduating in a Recession', *American Economic Journal: Applied Economics*, 4(1), pp. 19-29; and Altonji, J., Kahn, L. and Speer, J. (2016), 'Cashier or Consultant? Entry Labour Market Conditions, Field of Study, and Career Success', *Journal of Labor Economics*, 34(1), pp. 361-401.