

## CONSULTATION QUESTIONS

# OfS Consultation on constructing student outcome and experience indicators for use in OfS regulation

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## General questions regarding this consultation

### QUESTION 1: ARE THERE ASPECTS OF THE PROPOSALS YOU FOUND UNCLEAR?

n/a

### 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?

n/a

## 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?

Strongly Disagree

1. MillionPlus agrees with the proposed approach to constructing binary measures for the measurement of continuation and completion. As we have outlined in our submissions to previous phases of the OfS consultations on quality and standards, there are a wide range of factors that can influence an individual's journey through their studies. The challenges that students face outside campus life are not evenly distributed across the sector. This is why MillionPlus is pleased to see that contextual factors will be incorporated into the regulatory process, both when setting the overall numerical thresholds and when considering the case of individual providers through benchmarking. It therefore seems reasonable to construct a binary measure for continuation and completion.
2. However, MillionPlus thinks that the construction of a binary measure for progression is more problematic. In our answer to question 6 in the consultation on a new approach to regulating student outcomes, we explained some of the reasons we think progression is distinguishable from the other two student outcomes measures, as follows:
  - Progression is perhaps the most complex of all the metrics in terms of drawing a direct causal link between the role of the provider (the quality of the educational experience) and the student outcome being measured.
  - The time lag for the progression metric is the largest for any of the three measures of student outcomes. Progression metrics published in the 2021-22 academic year would relate to students who

have started full-time undergraduate courses at least five years prior to the data collection, and at least seven years prior to the data collection in the case of part time undergraduate students.

- Despite significant improvements in the recruitment practice of many employers over recent years, there is still a considerable level of prejudice towards graduates based on the type of institution they attended (perceived prestige). So in many cases performance on this indicator will often reflect the subjective view of employers with respect to institutions rather than any objective measure of performance of universities or the level or personal development/learning gain of the individual.
- There are structural, socioeconomic factors that influence progression into highly skilled employment such as race, class and disability. The consultation document indicates that some work has been undertaken to mitigate for these factors, which is to be welcomed. Nevertheless, the way in which these socioeconomic factors influence outcomes is arguably more complex than is the case for continuation and completion, because these are now interacting with an even deeper mix of societal factors, mainly those pertaining to the labour market.
- The flip side of this is that by setting too strict a numerical threshold for progression risks ignoring the agency of the individual graduate in the labour market. There is a limit to the impact that the institution can have in the direction of the individual after they have left the university. This is not to suggest that the university does not have a role and responsibility to promote and support strong progression outcomes. But there is a danger universities become punished for something over which they have only partial control.

3. With these factors in mind, it might be prudent to treat the progression metric with a slightly different approach to that of continuation and completion. Bringing this back to the question in hand, constructing a binary measure might not be the best way to approach progression. Assigning students the label of positive or negative after only 15 months is perhaps short-sighted. MillionPlus believes that the Graduate Outcomes survey is a significant improvement on the previous Destination of Leavers from Higher Education (DLHE) survey.
4. There will always be a trade-off between capturing the full impact of university study on graduate careers (i.e. more long term) and time lags in the data and reliability concerns. But creating a binary for the progression measures risks ignoring 1) the range of motivations that students have for entering higher education 2) the broader benefits bestowed upon graduates that are not limited to definitions of highly skilled employment, but nevertheless contribute to their personal development and progression after university. One way to mitigate this might be to incorporate other elements of the Graduate Outcomes survey into the progression metric so that it can account for a broader sense of value and impact with respect to progression after study that is relevant to the student.
5. Drawing a crude binary of positive or negative outcomes after only 15 months ignores the longer term career benefits that are accrued by graduates that often do not show up after such a short amount of time. Furthermore, it also ignores how graduates in certain disciplines develop after university and build their professional credentials in a more accumulative pathway that would not be recognised as highly skilled employment. This is most notable for the creative arts, where students often are developing a portfolio of work in the immediate years after study to build cache in their field. The creative industries are one of the fastest growing sectors of the economy, and are estimated to be valued at £128.4bn in the UK. It would therefore seem a strategic error to overlook this and end up punishing certain institutions largely based on their subject specialisms.
6. MillionPlus believes there might be merit in the OfS exploring a more relative measure of progression. This could be done by introducing some kind of scale of outcomes that is not limited to one single definition of positive or negative. The SOC codes that underpin the measure of highly skilled

employment do have a hierarchy or order that could be utilised here. Similarly, this would open up room for “other activities” to be placed on a scale that gives them a relative position that is distinguishable from unemployment.

**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)?**

Agree

7. If data is to be made publicly available through data dashboards, it follows that it should be available to be downloaded as files to help those in the sector use and interpret the data in a way that suits them. However, this should be done on the condition that there is a clear disclaimer about the level of statistical uncertainty involved in the figures with all publication formats. It is important that this does not just feature on the dashboards but that this is clearly marked in relation to the data folder and that there is some explainer of statistical confidence and how this relates to the data in question. This will act as a deterrent against irresponsible use of the data that is being published and hopefully helps to increase the level of accountability in the use of the data. The danger is that the data will be downloaded and manipulated by those who will not apply the appropriate level of rigour, and then this is shared to spread misinformation, or misleading perspectives on provider performance.

## 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?**

Neither agree or disagree

8. MillionPlus agrees in general with the reporting structure that is outlined here. However, it would have been beneficial to have had the relationship between indicators and split indicators be made more explicit or explained as part of this section. As such it is left unclear as to whether there is any relative emphasis or importance to indicators and split indicators being proposed (or if views are being sought on this).
9. MillionPlus would object to registered students being included within the reporting structure of the TEF. We will be making our arguments for this in more detail in our response to the TEF consultation.

**QUESTION 6: TO WHAT EXTENT DO YOU AGREE WITH OUR PROPOSED APPLICATION OF THESE CONSULTATION OUTCOMES TO THE ACCESS AND PARTICIPATION DATA DASHBOARD?**

Agree

## 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?**

Agree

## 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.**

Neither agree or disagree

10. MillionPlus believes that it would be more appropriate to rely upon a student's substantive mode of study across their whole course. It appears that one of the main reasons offered for not adopting this method is the complexity of application. But complexity should not be a barrier here to finding what is the most accurate method of recording students' mode of study. It is hard to comment on this proposal without having a better sense of the degree of complexity that would be involved in this. But if this complexity essentially refers to the possibility of some arbitrary categorisations in specific cases, this alone does not appear to justify opting for a less accurate approach.
11. One might argue it is also arbitrary to assume a cut off point for mode of study at the beginning of the course. What is perhaps most important here is that there might be students who change their mode of study but still achieve positive outcomes (within the parameters of their new mode of study). In such cases the role played by the university in supporting a student through such a transition is actually likely to be more direct and more active than the average student who continues and completes their course successfully. It therefore seems unreasonable to punish providers who have played an instrumental role in supporting successful outcomes in scenarios where students have changed mode of study mid-way through their course.

**QUESTION 9: TO WHAT EXTENT DO YOU AGREE WITH OUR PROPOSED DEFINITIONS OF TEACHING PROVIDER?**

Agree

**QUESTION 10: TO WHAT EXTENT DO YOU AGREE WITH OUR PROPOSED DEFINITIONS OF ENTRANT AND QUALIFYING POPULATIONS?**

Neither agree or disagree

12. MillionPlus would question the apparent inconsistency in application of logic across different levels of study. It appears that when more than one provider has contributed to the teaching and development of a student at postgraduate levels, the OfS will take steps to recognise this i.e. for collaborative doctoral programmes. But in the case of undergraduate study, if an individual takes credit over from one institution to another, this is only counted by the final institution. We appreciate that this is not a direct comparison and, in the case of doctoral training collaborations, the shared nature of the study across different institutions is intended and built in from the beginning. Nevertheless it seems like an inconsistency in the logic that is being applied here, which arguably favours those providers who have a greater proportion of their provision at postgraduate level.

## 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?**

Agree

**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?**

Agree

**QUESTION 13: TO WHAT EXTENT DO YOU AGREE WITH THE OUTCOMES WE PROPOSE TO TREAT AS POSITIVE OUTCOMES FOR THIS MEASURE?**

Agree

**QUESTION 14: TO WHAT EXTENT DO YOU AGREE WITH THE PROPOSED APPROACH TO STUDENT TRANSFERS IN MEASURES OF CONTINUATION OUTCOMES?**

Agree

13. It appears that the main problem identified here relates to limitations in the data. It would be good therefore, for the OfS to explore what data would be needed and how this could be achieved to support effective monitoring of credit transfer. It is a shame that institutions that have played a successful role in developing students who transfer will not be recognised. Under the current limitations, it seems sensible to treat these as neutral. But it means that the success of a student and their positive outcomes will only be attributed to the finishing institution for student transfers, which only recognises part of the institutional role played in their trajectory.

## 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?**

14. MillionPlus can see the strengths and weaknesses of each option, but there is a slight preference for cohort-tracking. This is because it places the greatest importance on the precision of the measure. It also seems to be an approach that is more in line with the methodology proposed for continuation. Consequently we think there is a greater consistency and overall coherence to the measures. There are benefits to the compound indicator, namely the timeliness.
15. While it is important to minimise the time lag associated with the data used in these measures, we accept that there is an inevitably in having some degree of time lag. Indeed, the compound measure does not eradicate a lag in the data. And since there will always be four years of data that are being considered (and six entry cohorts), the focus on timeliness seems less of a priority. Moreover, because this measure will also sit alongside continuation (which does not have the same time lag), one could argue that timeliness is less of a priority. The cohort-tracking method is also easy to understand for the sector, students, and wider the wider public.

**QUESTION 16: TO WHAT EXTENT DO YOU AGREE WITH THE DEFINITION OF THE COHORT-TRACKING MEASURE DEFINED WITHIN THIS PROPOSAL?**

Agree

**QUESTION 17: TO WHAT EXTENT DO YOU AGREE WITH THE DEFINITION OF THE COMPOUND INDICATOR MEASURE DEFINED WITHIN THIS PROPOSAL?**

Agree

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?**

Agree

16. If it is not practical to collect and interpret data from international students for progression measures, then it is sensible to exclude them from this measure.

**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)?**

Agree

**QUESTION 20: TO WHAT EXTENT DO YOU AGREE WITH OUR PROPOSED APPROACH TO PARTIAL RESPONSES TO THE GO SURVEY?**

Agree

17. This approach is consistent with the HESA approach to response rates and is therefore straightforward for the sector to understand and work with.

**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?**

Strongly Disagree

18. MillionPlus questions whether it is appropriate to count travelling activities as a positive outcome. This is likely to simply reward privilege, as those who go travelling after university will correlate strongly with those from more affluent backgrounds. We do not seek to make any value judgment about the travelling activities here, but it is unclear how this fits in with the guiding principles that have shaped other aspects of the proposals. The consultation clearly outlines that one of the considerations that has been made in developing these proposals is value for money for taxpayers. It is not clear how travelling as an activity, while valuable as a life experience, represents a return on investment for the taxpayer, or contributes directly to British society in a broader sense.
19. This contrasts with other categories mentioned in the question. Carers are making a huge social contribution to society that is often not recognised financially but should be treated as a positive outcome for the inherent value of such a contribution. They are also providing a service that may otherwise be subsidised by the state. Retirees have, in most cases, already made significant contributions

to the public purse, and to wider society, throughout their lives, and it would seem unreasonable to count this as a negative outcome. Treating them as otherwise could also have reverse consequences on mature student recruitment, even if these are caused indirectly through the incentives/regulatory pressures placed on institutions.

**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?**

Disagree

20. As outlined in our response to question 3, MillionPlus believes the construction of a binary metric for progression is problematic. This is because it might be too crude to simply attribute a positive or negative outcome to graduates 15 months after graduating. For these reasons we would advocate for a more relative or scalar measure, as opposed to the zero-sum of positive or negative. This would enable the inclusion of general employment outcomes as well, while still prioritising managerial and professional employment. In addition to this, there could be some distinction made between those that have "doing something else" as graduate's main activity as opposed to unemployment.

**QUESTION 23: DO YOU HAVE ANY COMMENTS ON THE ADVANTAGES AND DISADVANTAGES OF THE PROPOSED DEFINITION OF MANAGERIAL AND PROFESSIONAL EMPLOYMENT?**

21. One of the main disadvantages of the proposed definition of managerial and professional employment is that it is unlikely to be able to capture the value of creative arts degrees. Many graduates in these subject areas follow a specific pattern of career development during the period immediately after graduation in which they build portfolios of work, often operating on a freelance basis and developing content in a way that is not always tied to formal employment. The creative industries are one of the fastest growing sectors of the economy, and are only likely to become more important as we gradually move deeper into a "knowledge-based economy".
22. MillionPlus thinks it might be short-sighted to regulate providers in a way that would categorise these students as constituting a negative outcome, as their contribution to society, both economically and culturally, is only likely to be fully realised further down the line. Indeed, this pattern of career development is not limited to the creative arts, in an economy and society that is becoming progressively more inter-disciplinary. But the issue is particularly acute for creative arts graduates. The danger is that this measure is likely to penalise institutions based on their institutional specialism ahead of their capacity to influence and foster positive outcomes for students.

**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?**

n/a

**QUESTION 25: DO YOU HAVE ANY COMMENTS OR SUGGESTIONS ON THE POTENTIAL FUTURE USE OF GRADUATE REFLECTIVE QUESTIONS?**

23. MillionPlus believes that the graduate reflective questions should be incorporated into the progression measure in some way. The Graduate Outcomes survey is a rich data source that is the envy of many other

nations in terms of tracking graduate activities and opinion. The current proposals risk leaving this valuable resource underutilised in the regulation of student outcomes. It is important to remember that the OfS was founded on the principle of responding to the needs and interests of students. This principle is reiterated numerous times in the current consultations on quality and standards. It is logical, therefore, to include the student voice in the measure into the process of regulating student outcomes.

24. MillionPlus understands the limitations of using the reflective questions to judge and monitor institutions. These questions are open to the subjective opinion and interpretation of students, which can make them less robust than other measures. However, there is equally a risk in developing an approach which takes no account of the student voice. The risk in the proposed approach is that the OfS is only responding to a narrow set of student interests with respect to life after study and the impact of the university experience. MillionPlus believes the employability of graduates is of great importance, and that there should be some incentives within the system for institutions to support high levels of progression into highly skilled employment. But employability (and by extension, progression to highly skilled employment) is not the only reason that students enter higher education. It is important not to define the value of education purely in economic terms through this exercise. The risk is that the OfS arrives at a point where it is effectively telling students what is in their best interests to be doing 15 months after graduating, without having any regard for how impactful or useful students see their university experience themselves.
25. Once again, MillionPlus observes a distinction here between progression and the other two measurements of student outcomes. For continuation and completion measures, it is reasonable to work on the assumption that it is the best interests of student to continue and complete the course they have signed up for. This is because we should expect that all students engage with higher education with the intention of continuing and completing. But for progression, the outcomes that are being measured are slightly more complex and do not always correspond directly to the motivations of students have for entering higher education. People decide to study for a broad set of reasons, and when polled, interest in the subject of study usually emerges as the top response for students. Of course, most students also intend to progress to highly skilled employment. But it is wise not to be too reductive here in terms of ascribing value or positive outcomes to graduates.
26. MillionPlus is encouraged to see that Graduate Outcomes responses are offered as one example of evidence that might be considered when applying context (for institutions who are shown to be below the numerical thresholds). But MillionPlus believes that the OfS can go further here, by embedding some of the reflective question responses into the progression measure. As noted above, we acknowledge the limitations of using these questions as a measure of institutional performance. This is why we would not advocate for a new measure or metric to added alongside the three that are proposed. This could also increase complexity and burden for providers and the OfS. Instead, we would like the OfS to explore the possibility of combining the reflective questions with highly skilled employment to produce a composite progression measure, as hinted at in the consultation document.

## 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?**

Agree

**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)?**

Agree

### 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?**

Agree

**QUESTION 29: TO WHAT EXTENT DO YOU AGREE WITH OUR PROPOSED DEFINITION OF SPLIT INDICATORS SHOWING SUBJECT STUDIED USING CAH2 SUBJECT GROUPS?**

Agree

**QUESTION 30: TO WHAT EXTENT DO YOU AGREE WITH THE SELECTION AND PROPOSED DEFINITIONS OF SPLIT INDICATORS FOR STUDENT CHARACTERISTICS?**

Agree

**QUESTION 31: TO WHAT EXTENT DO YOU AGREE WITH THE SELECTION AND PROPOSED DEFINITIONS OF SPLIT INDICATORS FOR COURSE TYPES?**

Agree

**QUESTION 32: TO WHAT EXTENT DO YOU AGREE WITH OUR PROPOSED DEFINITION OF SPLIT INDICATORS SHOWING PROVIDER PARTNERSHIP ARRANGEMENTS?**

n/a

### 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?**

Agree

**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?**

Agree

**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?**

Agree

27. MillionPlus understands the practical advantages of using ABCS. It would be useful to have more clarity on when it will be possible to include ABCS for all of the three metrics (the description of timings in paragraph 439 is quite vague). This will help providers in planning for the changes.

**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?**

n/a

**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?**

n/a

### 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?**

28. MillionPlus thinks that the proposed presentation of student outcome indicators and approach to statistical uncertainty is well explained and appears sensible. However, there is always a risk, that when designing a user-focused system that is aimed at experts and the wider public, there will be problems in communication and risks that the information is not interpreted properly. There will always be a trade off in this. It is questionable how many outside of the world of HE will actually be accessing and using this data and inspecting the statistical uncertainty associated with the figures. It should always be remembered that the primary audience for this data will be those working in the HE sector.
29. MillionPlus believes that it would be advantageous for the OfS to establish a better name/descriptor for the shaded bars that are used to demonstrate statistical uncertainty. This name should be simple and clearly indicate the general purpose/use of the table/graphics. This will help in wider communication and should give them a distinctive identity that people can refer to as a clear reference point. As it stands the name is too vague, which does not lend itself well to them being used and known widely within the sector.

**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?**

n/a

### 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?**

n/a