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## **HEFCE/UUK/GuildHE Consultation on Changes to Information Published by Institutions**

1994 Group response to the HEFCE/UUK/GuildHE joint consultation on changes to information published by institutions.

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The following is the 1994 Group's response to HEFCE/UUK/GuildHE consultation on changes to information published by institutions. For more detailed information please refer to the individual responses of our member institutions.

Members of the 1994 Group are: University of Bath, Birkbeck University of London, Durham University, University of East Anglia, University of Essex, University of Exeter, Goldsmiths University of London, Institute of Education University of London, Royal Holloway University of London, Lancaster University, University of Leicester, Loughborough University, Queen Mary University of London, University of Reading, University of St Andrews, School of Oriental and African Studies, University of Surrey, University of Sussex and University of York.

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The 1994 Group welcomes and is entirely supportive of the initiative to improve upon information available publicly to prospective students and stakeholders within the sector. Our institutions are committed to providing students with up-to-date, relevant and easily accessible information, advice and guidance.

### **Consultation Questions**

**Consultation question 1: Are the three key purposes of public information outlined in paragraph 42 still appropriate?**

**(A) To inform people about the quality of higher education and, in particular, to give prospective students information that will help them choose what and where to study.**

**B) As evidence for quality assurance processes in institutions.**

**C) As information that institutions can use to enhance the quality of their higher education provision.**

**If not, what additional or alternative purposes should a public information set seek to address?**

*Agree*

The 1994 Group strongly endorses the principle that relevant, accessible information should be made available to prospective students at the level they require. However, we would caution that 'public information' and 'public information set' seem to be used interchangeably in the question, and the latter should not be seen as an adequate substitute for the former.

The question above, and the consultation document in general, places implicit emphasis on giving 'prospective students information that will help them choose what and where to study'. Therefore, it should be acknowledged that the primary intention is to provide information that is helpful to prospective students in a way which, where possible, can also be used to support quality assurance and enhancement.

We agree that public information on quality and standards should continue to inform prospective students and others about the quality of higher education (HE), provide evidence for quality assurance purposes, and inform quality enhancement within universities. However we are concerned about the inclusion of these purposes in the public information set alongside the purpose to inform prospective students on what and where to study. All three purposes laid out in the question are very worthwhile and relevant; however, the provision of information in a form that is useful and accessible to prospective and current students may not be the most helpful for the purposes of quality assurance and enhancement. The difficulties in providing one set of information that meets all purposes should be recognised. The three purposes are also contradictory as to whether the public information set serves an externally or internally facing function.

The focus in reality on the first purpose listed in the consultation paper does limit the internal utility of the information. The information provided in the KIS will not provide evidence to support quality management processes (either assurance or enhancement) as it is far less detailed and useful than that already utilised by all institutions in their quality management processes. The overwhelming majority of the published information referred to in the consultation document only supports the aim of informing people of the quality of higher education. The only notable exception to this is the NSS, which does provide helpful information for quality assurance and enhancement.

We would express apprehension that changes to quality assurance processes are being proposed under the auspice of a consultation on public information. While we accept that new information produced or published in connection with initiatives seeking to provide better information to students will be of relevance to quality assurance processes, we have reservations with regard to the risk of circularity this presents.

**Consultation question 2: Do you think the KIS fulfils our objective of providing the information students have identified as useful, in a place they look for it, in a standardised and complete manner?**

*Disagree*

We strongly support the principle behind the Key information Set (KIS) that relevant, accessible information should be made available to prospective students. The KIS

has the potential of doing this although some aspects of it are not appropriate to achieve this. We would wish to draw the consultation team's attention to a few suggestions on how the KIS might be approached differently for a more effective end-result. It will be important to make the most out of this opportunity to constructively provide information to prospective students.

It is vital that all information supplied to prospective students is reliable, effectively linked to contextual material. To successfully communicate with prospective students we would suggest that the KIS is seen alongside the wider content of information available within the sector. Thus the format of the KIS must encourage the user to look beyond the initial body of information in an engaging, interactive way. The consultation document does recognise that a body of information such as the proposed KIS can, at best, only represent part of the picture of a full student experience and the information needed to assess this. At worst it could present an oversimplified or highly misleading impression.

This risk is exacerbated by the focus on quantitative indicators. Many of these are not necessarily reliable measures of quality, and there is a risk that they will form the basis of new types of league tables. The KIS contains no information on the content of academic programmes, and therefore risks communicating a 'commodified' impression of higher education. Furthermore, care should be taken to ensure that an overwhelming body of unprioritised information is not provided. The inclusion of a 'free text' section where institutions can provide some information on the distinctive characters of particular programmes might go some way in mitigating these issues.

We believe that one way to improve the clarity and usefulness of the KIS would be to ensure that it takes account of how courses vary over the programme of study (i.e. 3rd year students will receive different levels of support/guidance/contact than 1<sup>st</sup> year students), during different modules. The KIS should be able to account for programmes which are spread over more than one discipline, across institutions such as validated or franchised provision, and which combined Bachelor and Masters programmes.

We have strong concerns over the proposed use of employment and salary data in the KIS. We believe this is an area where the KIS is very weak at the moment and would risk providing prospective students with misleading data. Employment and salary data only 6 months after graduation is not a real indicator of employment and salary prospects. Experience also suggests that the use of averaging, combined with geographical factors will limit the usefulness of this information in practice. The 3.5 year data provided by the Longitudinal Destination of Leavers HE Survey (DLHE) is a much better reflection of what graduates can expect to achieve. However, the DLHE also present some issues for concern. Completion of the DLHE is on a voluntary basis and in the case of small cohort sizes there is a risk data will not be meaningful. One possible solution would be to aggregate the DHLE data at subject level instead of course level, where appropriate. We would urge that separate response rates should be published for graduate destinations and salary data along with a clear description of the cohort in question (e.g. "Data in respect of all UK domiciled, full-time first degree graduates graduating in 2010"). Furthermore, we have concerns about what an explicit definition of 'graduate job' would be. We do not consider that the proposed categories of employment are suitable for the KIS. We would encourage HEFCE to consider using instead the standard HESA publication categories featured in the HESA performance indicators. It is also not clear how the proposed methodology would apply to modular or joint degree programmes and those for which variations such as short or long placements or year abroad are offered.

We recommend that simplistic terminology like 'contact hours' is not used in the KIS. We believe that if this type of terminology is used, a range of criteria available for inclusion, such as independent guided learning, online contact, email, and directive work, should be emphasised. This will paint a more accurate picture of student teacher contact to prospective students. Related to this, we would also urge that the category of 'formal teaching' should be broken down further into sub-categories, such as lectures, small group events, practical/laboratory sessions, and/or one to one events.

We urge the consultation team to consider that purporting to present data at course level may be misleading in cases where the data are initially collated at the level of JACS codes (e.g. NSS). In practice the extent to which individual KISs can relate to programme level will vary considerably. This inconsistency is seriously problematic for the ease of understanding by a wide audience. On a larger scale, we would recommend the consultation team to bear in mind that the proposed KIS will present a potentially confusing mix of retrospective evidence and forward-looking information, which might mislead the prospective student. There is a risk that some parts of the KIS information might be interpreted as part of a prospective student contract. Since much of the information is indicative only and based on a snapshot in advance of the student entering the institution this would not be appropriate. Universities must be able to continue to develop and enhance their methods. The KIS information, especially in teaching and assessment, must therefore be clearly flagged as indicative only, and not as a basis for contractual expectations.

Finally, at present the KIS cannot account for the college systems at some universities. We are concerned that information on student support, student union clubs and accommodation and costs would not be reflected accurately in the KIS for these types of universities.

**Consultation question 3: Do you agree that links should be provided to the KIS from the UCAS web-site?**

*Agree*

If the KIS is adopted it would be sensible to provide links to it from the UCAS website. It is important that the information we provide for prospective students is easily accessible. It is also essential that we limit the duplication of administrative effort and information, to this end it may be useful for a master set of all KISs to be held centrally (i.e. by HEFCE).

One issue to consider is that the KIS for provision delivered at partner colleges would be published at the point of delivery and it is important that applicants for indirectly funded and franchise provision are directed to both the KIS (college website) and the University as awarding institution.

**Consultation question 4: Given that we want the production of the KIS to be as efficient as possible, are there particular administrative or logistical issues which the pilot phase should consider?**

It is difficult to give a detailed answer to this question without access to more thorough information on what the production of the KIS will entail, for example in terms of data collection and costs. We understand that the work of the expert groups will provide clearer information, but these groups are working in parallel to the

consultation process, and it is not clear how or if they will be informed by institutional views. Nevertheless, it is vital that institutions have a clear and comprehensive data specification at the earliest possible opportunity.

The pilot phase should consider as comprehensively as possible all aspects of the provision of a KIS. For every programme requiring a KIS it should consider models for maintaining KIS sites and web links to other information. We also note with concern that only prospective students are referred to under extensive user testing (paragraph 84 (d)). Of course this is important, but it does not cover all of the possible implications, nor does it cover all of the three proposed key purposes of the information set. We would also suggest that in the longer term, an evaluation of the effectiveness of the KIS should include its usefulness for (and compatibility with the needs of) internal quality assurance and enhancement.

Serious consideration should be given in the pilot phase to the administrative burden and resource demands of producing the KIS. Although much of the data to be published in the KIS will be drawn from existing sources, there will be an increased pressure on institutions in managing the existing data and obtaining any additional data. An increased burden will in particular be levied on central administrative functions, such as web support, and on departments, where the responsibility for the course level data will lie. It is also essential that the pilot phase is properly costed in addition to the projected recurrent costs for future years.

There are a number of issues to consider regarding sources of data. On an overarching level, it will be vital for the timescale for the production of the KIS to be considered alongside the timescale in which data informing the Set will be made available within the sector. The timing and the development of an annual cycle must be mindful of key peak periods of activity within the sector.

It will be necessary to understand how information from external sources will link with internal systems and for uploading to the KIS. We need to ensure that we know how external and internal systems work together to be compatible and a new structure for providing supporting contextual information will have to be devised. One idea to consider when the data are to be derived from sector wide sources such as HESA or the NSS could be to upload it in the format required for the KIS to a central database.

**Consultation question 5: Should the information set to be published on institutional web-sites (shown at Annex F) include short, up-to-date employability statements for prospective students, in addition to information about links with employers?**

*Agree*

We support and welcome the possibility for institutions to provide contextual data. It is essential that institutions are able to provide contextual data on employment, such as up-to-date information regarding links with employers and how institutions support employability, alongside the employability data.

One option the consultation team may want to consider is if it would be more helpful for employability statements to be part of the contextual information that links to the section on employment in the KIS. This would enable departments to connect their programme-specific comments with an institutional wide statement, rather than creating multiple links and documents.

**Consultation question 6: Does Annex F set out the right information items for inclusion in the wider published information set (subject to agreement on the inclusion of employability statements as proposed in Question 5)? If you think items should be added/removed, please tell us about them.**

*Agree*

We find the information items broadly appropriate, but would like to raise some issues for concern.

Much of the information suggested in the wider published information set is already made available by institutions, usually on their websites. We are mindful that the administrative burden on institutions is not increased, and would urge HEFCE to seek to minimise the additional work required to incorporate published information into any new regulatory framework. It could also be questioned how relevant prospective students would find some of the information suggested for inclusion, such as corporate plans and mission statements. It is right that this information is readily available to the public, but the information sets might not be the most appropriate forum to communicate it.

We feel there is need for clarification on how the wider published information set relates to the KIS. Some elements of the set are much more closely linked to the KIS than others – clear indications of which information is related to a course level and which information is related to an institutional level will be vital. The wider set also contains information written for a wider audience than the KIS. There needs to be clear explanations, so that users can perceive a structure to this range of information and the potential scope for confusion for the prospective student is minimised.

In this juxtaposition of information, there is a risk that there will be some difficulties in institutions providing the most relevant information in each case while maintaining an appropriate level of consistency between disciplines and between institutions. The possibility to flag additional information at a finer level of detail would be helpful.

One item to consider for inclusion in the wider set or the KIS is data on retention rates. Retention is significant for the student experience of both those that leave and those that remain at the institution. Retention data could be included at the appropriate level of disaggregation consistent with both clarity and effort involved. Attention would need to be paid to the complexity of reasons for low retention rates, as these could easily be misunderstood.

When further developing the information set we would urge the consultation team to monitor closely what happens to other current relevant consultation, such as the QAA consultation on changes to the Academic Infrastructure.

**Consultation question 7: Do you agree that the list of items for the information set should be maintained on HEFCE's web-site and updated as necessary on advice from HEPISG and QHE Group?**

*Neither agree nor disagree*

We believe that a list of items for the information set should be publicly available online.

We disagree, however, that the list would be updated “as necessary on advice from HEPISP and QHE Group” and urge the inclusion of sector stakeholders in this

process. The sector should be consulted and be given the opportunity to comment on any proposed amendments, additions and data required. This is especially important considering administrative burden and timescales.

**Consultation question 8: Do you agree that student unions should be able to nominate one optional question bank in their institution's NSS each year?**

*Neither agree nor disagree*

We support including students in the mechanism for student feedback and we feel it is important to recognise that many institutions already involve student unions and student representatives in deciding the optional questions for the NSS. However, the Group is divided on whether student unions should be able to nominate one optional question bank in their institution's NSS, therefore we would refer to individual members' responses in this question. We do, however, point to the need for further clarification on procedures for several student unions within one institution.

**Consultation question 9: Do you have any other comments on the proposals in this document, or further suggestions for what we might do?**

We are concerned that postgraduate taught (PGt) provision has not been given greater consideration in the consultation document. Concerning extending the NSS to postgraduate students, we are perplexed that no mention is being made of the already existing PTES and PRES. One would think that extending the PTES and rolling it out across the sector would be a more cost effective approach than extending the NSS. However, there are concerns with this which would correspond to the ones listed in paragraph 115 of the consultation document. Nevertheless, the quality of information available to postgraduate students is an important issue and opportunities to enhance this should be taken.

Further concerning the NSS, we believe that providing analysis of the NSS free text comments is unlikely to be of value as a comparison across institutions since comments are often context-specific and complex. We would also worry about the possibility of individual staff being identified and the disincentive for students to submit comments if they cannot be guaranteed anonymity. The free text comments are very helpful internally for institutions for quality enhancement and assurance, and we would not wish for this to be damaged.

We would welcome further clarification on a few issues: how the requirements will be applied to private providers or to employers with their own degree awarding powers; how the KIS will align with other regulatory requirements and already existing sources; how the proposed KIS will compare with the provision of information by institutions in other countries, and whether it will create a particular impression of the UK sector for international applicants; and how compliance with the KIS will be monitored, as it not entirely clear the role that the QAA will play in ensuring that appropriate information is published.

We agree that schools and colleges have an important role to play in helping students to understand the nature of higher education study as well as the characteristics of individual programmes. We would therefore welcome work to enhance the support for students by schools at this stage of their education, as suggested in paragraph 129, and to help institutions to continue to work with schools to support students. Once again this reinforces the importance of helping students to appreciate the context of raw data.

We would urge that the KIS will be seen as a developing resource. Therefore, it should start out with reliable information effectively linked to contextual data, and more information, like graduate salary or employment destination data, could be introduced later.