

National measures for higher education performance (W18/15HE) – summary of consultation outcomes and HEFCW response

Responses received from:

Aberystwyth University; Cardiff Metropolitan University; Cardiff University; The Open University in Wales; University of South Wales; Wrexham Glyndŵr University.

Q1 Do you have any comments on the general approach proposed?

Key points:

- Broad agreement, welcome for general approach and principles to be used, with emphasis on selecting measures using existing sources of data;
- General support for the six baskets of measures and comfortable with 2016/17 baseline;
- Some concerns retained about HEFCW's intended purpose and use of the indicators and their intended audience;
- Potential for tension between basket of measures at sector level and using the same measures at institutional level;
- Concern about overall number of measures and potential burden and whether there might be a core set of measures;
- Data will need to be evaluated for accuracy, compatibility, timeliness and rigour of definition. Some questions about specific definitions of measures;
- Need to take into account institutional diversity and mission. Some concern expressed at the expectation that all institutions contribute to all measures;
- Should use benchmarks and sector comparisons where possible and look at trends;
- Query whether measures are too focussed on the 'economy' at the expense of 'teaching/learning', with ambiguity remaining about the Teaching Excellence and Student Outcomes Framework (TEF);
- Where does the statutory commitment to the Welsh language fit in;
- Some references to Weingarten Report¹ recommending that institutions propose their own measures, which could reflect the breadth of diversity in the post-16 sector;
- Noting potential link between these measures and the outcomes measures proposed in the PCET consultation²,
- Would welcome opportunity to provide contextual information at institutional level.

Response

HEFCW recognises the difference between sector and institution measures but in many cases these are the same thing. We aim to be clear where measures are sector only. Where these measures inform our regulatory/funding role (eg in terms of

¹ <https://beta.gov.wales/sites/default/files/publications/2018-09/maximising-the-contribution-of-the-post-compulsory-education-and-training-system-to-the-achievement-of-welsh-national-goals.pdf>

² <https://beta.gov.wales/tertiary-education-and-research-commission-wales>

the institutional risk review), contextual information is key and institutions are given an opportunity to further explain where risks are identified. Information is treated with appropriate confidentiality. In terms of the sector position, we aim to utilise percentages and benchmarks wherever possible to acknowledge institutional differences.

We recognise institutional diversity and the different strengths in the sector but we normally expect all institutions to contribute to improvement in key areas of priority and not to leave action only to those regarded as the main player(s) in that area of priority.

Further detail on the definition of the calculation of the measures will be provided as the measures are further developed, and are not addressed in this document.

It is important to recognise that these measures will need to change and develop as policies at local, national and international level alter. Some areas for further development are indicated below. We will aim to work closely with those involved where measures are to be amended or supplemented.

Q2 Are these appropriate measures for the Increasing Widening Access and Inclusion basket?

Key points:

- Broadly supportive of the measures but a concern about the focus for this basket, with lots of indicators in different areas;
- General welcome for move to incorporate bottom two quintiles of the Welsh Index of Multiple Deprivation (WIMD) but concerns raised about whether this is best use of resources and whether it adequately covers rural areas. HEFCW will need to use the most up to date WIMD postcodes;
- Welcome equality and diversity measures but a need for some areas of equality data to be benchmarked (eg ethnicity). Numbers can be small and percentage changes misleading;
- Could explore gender bias in subject areas to encourage widening participation and a better gender balance;
- Welcome more detail on oversight of outcomes for students declaring mental health conditions during their study;
- Support for part-time measures but a need for greater clarity in the use of the comparison with the UK figures; a concern about the measurement of part-time retention; and a query whether the figures for lifelong learning and distance learning should be separated from part-time figures;
- Welcome continuity of measures. Need for long term measures in this basket.
- Inclusion of learning gain/learning value added will be important.

Response

HEFCW recognises that there are different ways of measuring widening access and inclusion. We also take the view that this requires long term action and some

continuity of measures. Our proposal to include both WIMD (bottom two quintiles) and Participation reflects both the Wales and UK recruitment picture and provides some continuity. The inclusion of the bottom two quintiles (WIMD40) is based on research analysis which indicates³ that people living in areas in the bottom quintile (WIMD20) are just as likely to go on to higher education as those in the fourth quintile. We take the view that this is largely because of the previous political and funding focus on the bottom quintile and we propose that a broader, more inclusive approach is now more appropriate. This has been generally welcomed in responses.

Retention figures are taken from UK Performance Indicators (UKPIs) and therefore cover part-time first degree students and include distance learning and lifelong learning students. These are benchmarked data. Further consideration will be given to part-time data as part of our forthcoming funding review.

Data on student equality and diversity, including disability data which references mental health conditions, is already published on our website and we expect to develop this further by the addition of information on differential student degree outcomes, as signalled in our Quality Assessment Framework, and subsequently on diversity at subject level. We will utilise benchmarked data where possible.

We have had some involvement in the development of measures of learning gain and look forward to the outcomes of that work in England. If and when this becomes available, this will allow us to develop, working with the sector, a possible measure in this area, recognising the emphasis on learning value added in the PCET consultation and the Weingarten report.

Q3 Are these appropriate measures for the Improving Student Experience basket?

Key points

- General support for the National Student Survey (NSS) measure and a comment that this should be the mainstay of measuring the student experience, but a number of responses raised questions about whether other themes or questions in the NSS should be used instead of 'overall satisfaction' (but no consensus on which ones). The use of benchmarked NSS data would be important;
- One response suggested that the UK Engagement Survey (UKES) and Postgraduate Teaching Experience (PTES) produced by the Higher Education Academy (now Advance HE)⁴ should be utilised;
- A number of questions about whether some measures (specifically in relation to international/EU students and staff and Transnational Education (TNE) students) improve student experience;
- Several responses noted small numbers of TNE students and cost constraints and raised a query whether this would be more a measure of the sector rather than individual institutions;

³ <https://wiserd.ac.uk/publications/access-higher-education-wales-report-higher-education-funding-council-wales>

⁴ www.advance-he.ac.uk/

- A couple of responses queried whether internships; work placements; professional qualifications achieved; volunteering in the UK etc should be included and not just study experiences abroad (noting that widening access students find it more difficult to access placements abroad);
- A suggestion that measures in relation to Advance HE fellowship status of staff should be included;
- No agreement on whether the lower point of the Welsh medium measure (5 credits) should be increased to 10 credits but one suggestion that higher credit levels (60 and 80 credits) should be used to align with Coleg scholarships;
- Measures to promote non-credit bearing activity would be supported in several responses, including eg Welsh medium provision;
- Support for the external quality review measure;
- Several responses asked about the use of the TEF in the measures;
- A query about the use of the Office of the Independent Adjudicator (OIA) complaints in the context of recent questions about institutional ability to provide services and whether these data (complaints justified/partially justified/settled) could be benchmarked;
- It was noted that retention is also a measure of student experience.

Response

Although benchmarks are now available for the different questions within the NSS, HEFCW takes the view that the continuity provided by a focus on overall satisfaction produces clearer outcomes for Wales, and we are now seeing the outcomes for Wales being above the UK position, possibly reflecting our emphasis on the student experience and student partnership. Institutional suggestions for how the questions might be broken down and/or for other measures to be included are not consistent and largely reflect their own strengths and monitoring mechanisms. In addition, the inclusion of multiple NSS metrics in the measures would result in a larger number of measures in the basket. However, HEFCW's Quality Assessment Committee considers all NSS results, including subject breakdowns, and liaison with institutions will continue on these matters. There is likely to be some turbulence in use and positioning of the NSS at UK level over the next few years, including consideration of a possible post-graduate survey, and thus these measures will be kept under review.

There was no consensus in responses regarding the threshold for the Welsh medium measures. We are consulting with the Coleg Cymraeg Cenedlaethol and the Welsh Government regarding potential future measures that they will use, but in the absence of a current steer, we propose to retain current measures for the present.

As previously stated, the TEF is overseen and funded by the Office for Students in England and only reflects Welsh priorities within rules set by OfS. Institutions in Wales are able to participate in the TEF and HEFCW will facilitate participation and a level playing field where possible. QAC considers published TEF metrics, however, TEF measures will not form part of these performance measures.

We accept points made that whilst internationalisation on campus is a 'good thing', the measures of international/EU staff and TNE students are not necessarily measures of student experience. For that reason, and the need to monitor these

areas as we withdraw from the European Union, we have created a new category under 'other' to cover this task.

We recognise the importance of measuring the broader range of international experiences of students, and will therefore extend the proposed measure to include overseas employment and volunteering in addition to studying abroad, within a 'student mobility' measure.

Issues about measuring student work experience were raised in a number of contexts in the consultation. We plan further work with the sector to develop measures in relation to work experience and also degree apprenticeships. As noted above, another area for further work, covering both Student Experience and Widening Access and Inclusion is the area of differential degree outcomes. We will include this initially in the separate pages covering equality and diversity data.

We will continue to monitor a range of student data to inform our Quality Assessment Framework and Institutional Risk review processes, including applications and recruitment data. As indicated in our initial consultation, as part of work on 'Subjects of broader importance to Wales', we monitor subject performance and we expect to continue that work to inform institutional risk review and, equality and diversity monitoring.

Q4 Are these the appropriate measures for the Strengthening Skills, Employability and Entrepreneurship basket?

Key points:

- Extensive support for HEFCW's position in relation to the use of un-benchmarked Longitudinal Educational Outcomes (LEO) data;
- Recognition that other measures are under development but that the Graduate Outcomes Survey (GOS) will be available for 2017/18, albeit with a gap in publication following the final Destinations of Leavers from Higher Education (DLHE) in 2016/17. The need for such data to be benchmarked rather than using 'raw' data;
- Links identified between this basket and that covering the student experience, and the need for links between the two;
- One response querying whether graduate employment definitions used in league tables might be utilised;
- A query about the robustness of the Continuing Professional Development (CPD) data in the Higher Education – Business Community Interaction (HE-BCI) survey and a note that these data don't include the Wales component of one UK institution. Would need to be clear if this is learner days or income;
- One institution proposed a measure of distance travelled or value added;
- Note that the suggested measures don't include industry-focussed skills provision, eg degree apprenticeships. One response proposed a measure of numbers (higher level apprenticeships and degree apprenticeships) by level of study as well as successful achievement of intended award. General recognition that we need to develop apprenticeship measures.

Response

Consultation responses were generally supportive of current approaches to the measures of employment/graduate employment and were sceptical about the use of LEO data until it is properly contextualised and benchmarked. In response to that we propose continuity in retaining the existing DLHE measures for 2016/17 and moving to new Graduate Outcomes Survey measures from 2017/18 (recognising that these consider outcomes after 15 rather than 6 months and will not be comparable).

Whilst recognising concerns about the interpretation of HE-BCI definitions (see below) we propose to retain the CPD Learner Days measure. In response to the consultation, we will amend the description of the measure to use the HE-BCI terminology 'Courses for business and the community: CPD and Continuing education'.

As noted above, we plan further work to develop measures of student work experience and degree apprenticeships.

Q5 Are these the appropriate measures for the Broadening Innovation and Engagement basket?

Key points:

- A number of responses raised concerns regarding the robustness of HE-BCI data, although one response acknowledged that this is a long-standing data set. The main concerns related to consistency of interpretation of the definitions by institutions submitting data and a note that these data don't include the Wales component of one UK institution. These data should be reviewed;
- One response was not content to see HE-BCI broken down into individual measures. Other responses suggested alternative ways of breaking it down and raised a query about whether the data needed to be normalised for size of institution;
- A request for clearer information regarding the presentation of Research Excellence Framework (REF) impact outcomes although supported in principle;
- Some questions raised about why HEFCW had selected Industrial Challenge Fund and not other funds supporting research and business which might illustrate better research/industry collaboration. However, there were differing views on whether/how European funds might be included;
- Some support for spin-out and start up measures, including those still active after three years, but a query as to whether graduates in certain disciplines are more likely to take longer than three years to start up and how social enterprises might be measured;
- A query was raised about what constitutes 'engagement' and how it is being measured. In some institutions this could be through teaching and learning (eg business sponsorship). This raised a bigger question about whether HE-BCI measured civic engagement effectively, given that this is a current priority, and whether more work was required in this area.

Response

We recognise the concerns of the sector regarding HE-BCI based on past monitoring. However, these data are publicly available and collected systematically by HESA. HEFCW undertook work in the past to improve responses and gain more consistency in returns from Wales. Institutions have the opportunity to restate previous years' figures and HEFCW uses these restated figures in its analysis.

HE-BCI will be subject to a review by HESA in the near future and this will be an opportunity to address any of the concerns expressed about interpretation of definitions. More significantly, Research England is about to consult on the detailed operation of a new Knowledge Exchange Framework (KEF) which will include reference to key HE-BCI derived metrics. We will continue to engage with Research England on the potential for institutions in Wales to engage with KEF and we will need to retain flexibility in order not to close down any options at this stage.

Although specific HE-BCI measures have been selected to reflect areas of priority or Welsh Government focus, a further breakdown of HE-BCI data is provided to our Research, Innovation and Engagement Committee (RIEC) for consideration.

We agree that total HE-BCI income needs to be normalised by FTE academic staff to reflect the size of the institution. We will correct the description of the CPD measure in the Skills, Employability and Entrepreneurship basket to reflect that this does include learning and teaching engagement (continuing education). Spin-out and start up measures were broadly supported. We will amend the terminology to reflect HE-BCI 'spin-off', and focus 'start ups' on graduates only, looking for both at number established and number still active which have survived three years. We note that social enterprise is an area of Welsh Government priority. RIEC will review trends in this area.

In response to the consultation, we will remove the proposal to measure Industrial Challenge Fund outcomes but note that performance in these areas will be reviewed by RIEC. We will keep this under review as we engage with Research England on KEF.

Q6 Are these the appropriate measures for the Increasing Internationally Excellent Research basket?

Key points:

- General support for the measures but some concerns raised about the different measures of PhD performance (PGR numbers, PhD completions, PhDs awarded); a query whether MPhil and MRes should be included and a query whether this only reflects size of institution;
- One query raised about whether, other than the Research Excellence Framework (REF), these are measures of international excellence.
- A query whether REF measures would be broken down, eg overall ranking, research power, etc.

- Some issues raised (particularly from non-research intensive universities) about the need to cover a broader range of research, eg including innovation and knowledge income and pockets of excellent research;
- One query about whether research income should be divided by Wales/outside Wales, following the recommendation from the Reid Review⁵ rather than between Research Council and other research income.
- General scepticism about the need for, or mechanisms related to, bibliometric indicators.

Response

We accept that there may be some duplication of measures of PhD performance and, additionally, we have found that there are currently some issues with calculating PhD completion rates. We therefore intend to remove the measure on PhD completion rates. We recognise that some of the measures relate to the health and capacity of the research base, rather than directly to research excellence, but we consider it appropriate to include them as those factors underpin the research performance of the sector. Where possible, we will move away from annual percentage change, where small changes can cause large fluctuations, and focus on absolute numbers. As agreed in the consultation we will continue to monitor trends.

In terms of measuring research income, we will use HESA definitions in terms of clarity. HESA data does not identify Wales (ie largely Wales European Funding Office (WEFO)) and non-Wales sources of research income and so we won't be able to measure that, as requested by one response to the consultation. We will monitor total research income and Research Council income at both institution and sector level but we will include a sector specific measure which compares Research Council income against the UK (excluding the 'golden triangle' of Oxford, Cambridge and some institutions in London).

In response to the consultation, we will not retain bibliometric indicators as a national measure but RIEC could advise that a bibliometric study be commissioned in the future, as has happened in the past.

Q7 (Q8 in the consultation) Are these appropriate other measures?

Key points:

- Responses were generally supportive of the range of other measures;
- Some concerns regarding the robustness of Estates Management Statistics from the Estates Management Record, which is not audited, although one institution reported increasing use of these data internally. Any analysis of the EMS should take into account the prior condition of the institution's estate;
- A query from one institution about whether salary levels is a measure of performance but a recognition of the need for analysis of gender pay. One institution noted the need for institutions to provide contextual information in this area;

⁵ <https://gov.wales/docs/det/publications/reid-review-en.pdf>

- Support for the use of equality and diversity measures and a suggestion that HEFCW look also at equal pay audits;
- A number of responses raised concerns about the idea of monitoring major prizes in terms of what would be collected and how it would be measured
- A question whether 'other measures' would be considered as a 'basket' or simply monitored by HEFCW.

Response

HEFCW notes that institutions were generally supportive of these other measures which are largely subject to current monitoring (thus the links to other web pages). We understand the concerns regarding EMS data and will take contextual information into account, as appropriate.

In relation to institutional monitoring, in all cases there is an opportunity for institutions to engage with HEFCW and provide appropriate contextual information to support data analysis. We also recognise that data is, of itself, usually retrospective and thus can only provide a partial picture. We will ensure that our processes enable us to look more broadly, including appropriate contextual information.

Q8 (Q9 in the consultation) Have you any comments on how we will use the measures?

Key points:

- Some concerns remain about how HEFCW will use the measures and the differentiation between sector and institution performance. One institution suggested that measures for the sector and for institutions should be clearly differentiated;
- A suggestion from one institution about establishing 'leading indicators' for issues on the horizon;
- Caution about the need to take care regarding small numbers;
- A suggestion from one institution that HEFCW adopt a 'risk-based' approach to measures and where institutions are already performing well and are clearly competitive across a range of key metrics, then those institutions be regarded as low risk and left to continue their work. The risk based approach should be based only on a basket of measures tailored to the institution's strengths and priorities. Underperformance in these areas is more likely to have an impact on the institution and sector;
- The production of annual reports should take into account trend analysis rather than simplistic year on year comparison.
- Suggestion that HEFCW makes available the data on the measures on HEIDI-Plus⁶, which will allow institutions to compare within Wales and across the sector at the point in which the data is released. This is particularly relevant for Wales-centric measures (eg Welsh medium and widening access);

⁶ www.hesa.ac.uk/services/heidi-plus

- Reiterate need for a mechanism for institutions to contextualise the measures and perhaps submit supplementary data/commentary.
- Unclear regarding link with the TEF.

Response

The majority of the measures will be considered at both sector and institutional level. Where published, sector and institutional data will normally be given. However, there are a small number of measures which are measurable only at sector level and this is indicated (this is primarily where Wales is being compared to the UK or a section of it).

Further information, including a diagrammatical presentation, about how the data will be used by HEFCW was given in the consultation circular, and is repeated in the cover circular. Sector level data contributes to analysis at policy level and the development (with the sector) of approaches to improve institutional and sector level performance in areas of priority. This will also inform future funding initiatives, as monies are released from the implementation of the Diamond Review⁷ recommendations.

Institutional level data will be monitored regularly and inform HEFCW's Institutional Risk Review process (previously set out in Strategic Engagement, Circular W09/20HE), a process with which institutions in Wales have been engaging for nearly ten years. Data analysis of institutional performance has always informed those judgements. Quality Assessment Committee advice, including on the set of data published in the Quality Assessment Framework (set out in Quality Assessment Framework for Wales (W18/05HE, para 29) will continue to inform the IRR process, as will the advice of HEFCW's Research, Innovation and Engagement Committee (RIEC), which will monitor a full range of public research and innovation data, and, where appropriate, advice from the Student Opportunity and Achievement Committee (SOAC), and the measures proposed in this circular will continue to do that.

It is proposed that measures be considered by HEFCW under each of the 'basket' headings and a dashboard approach taken for each heading (eg under each heading such as Increasing Widening Access and Inclusion, a good performance in one measure may balance out a poorer performance in another measure in relation to institutional performance. Other measures would not be considered as a single 'basket'.

HEFCW is currently considering the potential for alignment between different regulatory and strategic processes (specifically the Institutional Risk Review; Fee and Access Plan and Strategic Planning and Engagement processes) and will aim to consult further with regulated and funded institutions.

⁷ <https://beta.gov.wales/review-higher-education-funding-and-student-finance-arrangements-final-report>