

Cylchlythyr | Circular

Responses to the July 2015 invitation to comment on future changes to the UK Performance Indicators

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To: Heads of higher education institutions in Wales and
directly funded Further Education institutions
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This circular and its annexes present a summary of responses to 'Invitation to comment on future changes to the UK Performance Indicators' (HEFCW [W15/14HE](#), July 2015). It also outlines the ways in which the UK Performance Indicators Steering Group (UKPISG) is responding to these comments.

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Introduction

1. This circular and its annexes present a summary of responses to 'Invitation to comment on future changes to the UK Performance Indicators' (HEFCW [W15/14HE](#), July 2015). It also outlines the ways in which the UK Performance Indicators Steering Group (UKPISG) is responding to these comments.

Background

2. Following a fundamental review of the UK Performance Indicators (UKPIs) during 2013 ('How should we measure higher education? A fundamental review of the Performance Indicators', available at www.hefce.ac.uk/pubs/rereports/Year/2013/ukpireview/), and recognising that full implementation of the review's recommendations will take time and need to proceed in stages, UKPISG has taken the following steps:
 - a. Accepted a set of recommendations arising from the fundamental review process.
 - b. Committed to engage with the sector during the changes, and acted upon this by inviting the sector to comment on some first actions arising from the fundamental review during December 2013 ('Invitation to comment on future changes to the UK Performance Indicators' (HEFCW [W13/40HE](#), December 2013).
 - c. Adopted in February 2014 a set of principles for UKPIs (available at www.hesa.ac.uk/pis/PISG) that guide how existing indicators are reviewed and new UKPIs developed.
 - d. Commenced an in-depth review of the Widening Participation and Research sets of UKPIs, and convened expert groups to participate in roundtable discussions on their future.
3. In July 2015, in circulars/letters to the heads of higher education providers, the four funding bodies for higher education invited comment on further changes to the UKPIs. Respondents were invited to comment on the extended coverage and scope agreed for UKPIs, and on the proposed new Widening Participation indicators to be published as experimental statistics. They were also notified of a forthcoming roundtable of experts to provide advice about new research UKPIs.
4. UKPISG considered a summary analysis of responses to its July 2015 invitation to comment at its meeting in October 2015, and decided how to take account of those comments: an outline of the next steps agreed by UKPISG is provided at **Annex A**. **Annex B** sets out the areas where comment was invited and provides a summary analysis of the nature and strength of the comments we received in each area. There were 54 respondents.

Key points

5. Respondents were broadly supportive of the direction that UKPISG was proposing to take, and their responses contained invaluable advice and cautionary comments about implementing the changes. This has enabled UKPISG to provide its supporting UK Performance Indicators Technical Group (UKPITG) with a strong steer as to issues and concerns that need to be addressed in development work related to UKPIs.
6. UKPISG is keen to emphasise that the publication of possible future UKPIs as experimental statistics will provide further opportunity for feedback. It is also possible that the ongoing development work may rule out one or more possible indicators even reaching the level of an experimental statistic. UKPISG will continue to keep stakeholders updated. By mid-2016 UKPISG envisages publishing:
 - a. The likely timescales for publishing experimental statistics which provide coverage of higher education students in publicly funded colleges and at alternative providers.
 - b. The likely timescales for publishing new measures of widening participation and research, in the form of a balanced range of measures in each area published as experimental statistics.
 - c. UKPITG's detailed understanding of issues identified in relation to publishing new measures of widening participation and research, and especially to those based on school type, free school meals and household residual income. Also UKPITG's interpretation of whether and how different issues can be overcome, and details of data sources, definitions and process (including quality assurance).
7. UKPISG has noted the potential for the Westminster Department for Business, Innovation and Skills' (BIS) development of the Teaching Excellence Framework to have implications for or overlap with UKPISG's work to review and refine UKPI measures. UKPISG will keep considering the right interaction between UKPISG's review of the UKPIs and the possible use of UKPIs or similar metrics in the development of the Teaching Excellence Framework. Representation from BIS on UKPISG and UKPITG, at strategic and officer level respectively, will facilitate engagement and aid effective management of any overlaps.
8. UKPISG has previously noted that fully implementing the recommendations of the 2013 fundamental review would need to take time and proceed in stages. This continues to be the case, and work to review the retention and employment UKPIs is yet to begin.

Further information

9. For further information contact Celia Hunt (tel 029 2068 2224; email celia.hunt@hefcw.ac.uk) or UKPISG@hefce.ac.uk.

Annex A: UKPISG's response to the comments

Introduction

1. The UK Performance Indicators (UKPIs) for higher education (HE) provide information on the nature and performance of the HE sector in the UK. They are intended as an objective and consistent set of measures of how a higher education provider is performing. The first set of UKPIs was published in 1999, having been developed from recommendations of the National Committee of Inquiry into Higher Education (the Dearing Report) to provide suitable indicators and associated benchmarks of the performance of the HE sector. The UKPIs are Official Statistics.
2. The development of the UKPIs has been governed by the UK Performance Indicators Steering Group (UKPISG). This collaborative governance arrangement continues to bring together representatives of the four UK funding bodies for HE, the Higher Education Statistics Agency (HESA), government departments, HE institutions and other appropriate bodies to steer the development of these measures. For more information, see 'Performance Indicators' on the HESA website¹.
3. A fundamental review of the UKPIs was commissioned by UKPISG early in 2013, in the context of large-scale, fast-paced changes in the HE sector, and differing policies for HE between the UK nations. The overarching aim of the research was to review the rationale, purpose and policy drivers of the UKPIs; their usage and their users; and whether the existing versions were still fit for purpose. The review engaged with a wide range of interested bodies and organisations, and was published in December 2013².

The more recent picture

4. Among the recommendations of the 2013 fundamental review accepted by UKPISG was that the current set of UKPIs required some refinement. The Widening Participation (WP) and Research UKPIs are the first sets of indicators to be reviewed by UKPISG. Expert groups have been brought together to advise on the future of these two sets of UKPIs, and have involved a range of organisations. Roundtable discussions with the WP expert group were held in December 2014 and identified a number of specific priorities and possibilities for measuring disadvantage or under-representation in the UKPIs. A record of the WP roundtable discussions is provided in the minutes of the April 2015 UKPISG meeting³.
5. In July 2015, in circular/letters to the heads of higher education providers, the four funding bodies for higher education invited comment on future

¹ At <https://www.hesa.ac.uk/content/view/2072/141/>.

² 'How should we measure higher education? A fundamental review of the UK Performance Indicators' is available at www.hefce.ac.uk/pubs/rereports/year/2013/ukpireview/.

³ See www.hesa.ac.uk/index.php?option=com_content&task=view&id=2331&Itemid=141.

changes to the UKPIs⁴. In the circular/letters, respondents were invited to comment on the extended coverage and scope agreed for the UKPIs, as well as on the proposed new WP indicators to be published as experimental statistics. They were also notified of a forthcoming roundtable of experts to provide advice about new experimental research UKPIs.

6. Annex B sets out the areas where comment was invited, and provides a summary analysis of the nature and strength of the comments we received. There were 54 respondents.
7. UKPISG considered the summary analysis of the responses at its meeting in October 2015 and decided how to take account of that comment: paragraphs 8 to 21 outline the next steps agreed by UKPISG.

How UKPISG is taking comments into account

General feedback

8. The comments received were broadly supportive of the direction UKPISG was proposing to take, and contained invaluable advice and cautionary comments about how that should be done. A number of comments point to the care that will be needed in developing new UKPIs.
9. UKPISG also noted the following cross-cutting points:
 - a. That some respondents were possibly unaware that the guiding principles for UKPIs that had already been agreed with the sector articulated the purposes and ambitions of UKPIs (and which are available alongside the UKPIs and associated content on the HESA website⁵).
 - b. That some comments seemed to reflect a misunderstanding of the benchmarking approach employed in the UKPIs, and that this made it difficult to determine the validity or substance of the points being made.
 - c. That concerns that UKPIs and experimental indicators might be published mixed together were not justified, as experimental statistics are not published as Official Statistics and initially would not be published at the same time as the formal set of UKPIs in the same area. Moreover, publishing as experimental statistics will enable further feedback before a decision is taken about whether these are fit to be formal UKPIs.
 - d. That an imperative of which UKPISG has been increasingly aware – the need to develop a range of measures in each area – was also evident or implicit in the comments made about the proposed WP

⁴ See 'Invitation to comment on future changes to the UK Performance Indicators' (HEFCW [W15/14HE](#), July 2015).

⁵ See https://www.hesa.ac.uk/dox/performanceIndicators/PISG/Guiding_principles_UKPI_agreed_Feb_2014.pdf, available at www.hesa.ac.uk/pis/PISG.

indicators, and the early comments about revising the Research UKPIs.

- e. That the visibility and transparency of the UK Performance Indicators Technical Group's (UKPITG's) development work would be of critical importance in addressing stakeholders' desire for further clarification and definitional detail. Such transparency would be of particular help to address sensitivities over issues of data quality and comparability, especially in relation to the use of data sources that were beyond the control of HE providers.

Extending the coverage of UKPIs

10. The direction of the comments received on this proposal was broadly supportive of extending the coverage of UKPIs to include HE in publicly funded colleges and at alternative providers. It was this area that provoked most comment about benchmarking, and as noted this has proved difficult to interpret.

Summary of UKPISG's response and next steps

UKPITG intends to publish the existing sets of UKPIs for the existing providers (namely, publicly funded UK higher education institutions and the University of Buckingham) according to the following timetable: WP UKPIs in February 2016, Retention UKPIs in March 2016 and Employment UKPIs in July 2016.

Publications including the extended coverage (of HE students in publicly funded colleges and at alternative providers) will take the form of experimental statistics in the first instance, and timetables for these are currently under consideration by UKPITG. UKPITG is in the process of establishing the comparability of data standards across these parts of the HE sector and the scale of any work required to align data definitions and determine the feasibility of different UKPI measures.

By mid-2016 UKPISG will publish the likely timescales for publishing the experimental statistics which provide coverage of HE students in publicly funded colleges and at alternative providers.

Widening participation measures

11. UKPISG asked for comment on a decision to stop publishing a UKPI based on National Statistics Socio-economic Classification (NS-SEC), and on a set of proposed new WP indicators. Different proposals received differing strengths of support, with a few responses clearly opposed to some of the specific proposals for new statistics. Many respondents raised queries and made comments rather than indicating clear support or opposition. These comments are invaluable to UKPISG and UKPITG in taking forward the work involved in developing experimental WP statistics.
12. UKPISG felt that the responses from stakeholders demonstrated understanding of the need for change but highlighted the absence of a clear consensus about what new WP measures might actually look like

and what direction such change should take. Members considered that the use of experimental statistics would be helpful in facilitating a period of user testing, further feedback and future endorsement.

13. The decision to stop publishing a UKPI based on NS-SEC was supported more than it was opposed, but those who indicated that they wanted it to continue made a strong case for UKPISG continuing to work to improve data quality in this area, and to consider further the development of a robust UKPI firmly focused on socio-economic deprivation. Some respondents who were concerned about its removal from the UKPIs appeared not to have realised that the information would still be collected in UCAS, HESA and other administrative data returns, so would remain available for use by stakeholders.
14. Broad points that UKPISG considered as carrying particularly strong arguments, and is keen for UKPITG to take into account in developing the experimental WP statistics, included the following:
 - a. A full set of WP UKPIs and experimental statistics would need to include indicators that were relevant to mature, part-time and distance learning entrants to HE, and were not solely appropriate to young entrants.
 - b. Each new experimental statistic would need to be published with clear contextual information, as well as an indication of its source data and how that data was available to institutions.
 - c. Care would need to be taken in relation to some of the proposed statistics with regard to regional and national variations in the disadvantage or under-representation being measured, and this might have some impact on the appropriate benchmarking approach for those indicators.
 - d. Each new statistic would need to measure something over which the provider of HE could have some influence, for instance in relation to deciding who to admit.
15. A number of caveats were expressed regarding a statistic examining the proportions of entrants from different school or college types. UKPISG has asked UKPITG to take these on board, and address them in its development of specific proposals for the first statistics to be published experimentally during 2016. These included issues relating to differences in (and comparability of) educational structures across the UK, and limitations to the effectiveness of cohort-based measures in this context, and are discussed in more detail in paragraphs 27 to 31 of Annex B.
16. UKPISG noted a considerable number of concerns relating specifically to statistics considering entrants who had received free school meals as school pupils, and that care would be needed in developing and presenting these measures. It asked UKPITG to consider a useful range of points made by respondents (and discussed at paragraphs 32 to 37 of Annex B) during its development work. UKPISG members noted that it was not currently known whether UKPITG's work would be sufficiently able to

overcome these issues to enable them to proceed to an experimental statistic. If so, feedback from that publication would need to be carefully considered before a decision on the measure's fitness to become a formal UKPI.

17. With regard to household residual income, UKPISG noted the need in the case of mature learners to distinguish clearly between residual parental income and the income of the student. This statistic was one that raised issues of regional variation and how benchmarking might need to take this into account.
18. With regard to nation-specific measures of area-based disadvantage, a key point made was that the failure to have a UK-wide measure was unhelpful. UKPISG agreed however that the proposed experimental statistics needed to proceed on a national basis as there was no satisfactory UK-wide measurement that could be used at present.

Summary of UKPISG's response and next steps

With regard to the development of the WP UKPIs, UKPISG noted that its proposals stemmed from expert roundtable advice, and respondents' comments provided additional insight into the sector's support and concerns.

The decision to cease publishing NS-SEC statistics as a UKPI in 2017 and future publications would remain, but UKPISG committed to continue to work with partners to improve data quality and consider alternatives.

UKPITG was asked to continue its work exploring all the other proposals as experimental statistics, with particular awareness of a considerable number of aspects that would need to be addressed in that development work. These issues related especially to school type, free school meals and household residual income.

UKPISG noted that it would need to be sure that its decision-making paid attention to a number of overarching points: in particular, being sure that a range of measures was used in each area so that any tranche of UKPIs was not all biased in one direction (for instance, only considering young entrants into HE).

Research measures

19. A number of respondents noted the review of Research UKPIs and the use of an expert roundtable and experimental statistics, and offered suggestions about possible new measures. UKPISG is considering the comments received from the sector alongside the advice from the expert roundtable, which met in September 2015 and included a number of academics and research managers from a range of higher education institutions (including those involved in the Snowball Metrics project, which some respondents wanted to be sure was taken into account).
20. A number of respondents wanted continuing involvement in the development of the research indicators. This will be ensured through continuing opportunity for feedback on the experimental statistics once they start to be published.

Summary of UKPISG's response and next steps

The note of the roundtable meeting and the advice received about the future of the Research UKPIs will be published in due course.

UKPITG will explore the feasibility of the expert group's proposals and begin development work in the areas of greatest potential during early 2016.

By mid-2016 UKPISG anticipates being able to publish, on the basis of UKPITG's work, further indications of the direction and nature of research experimental statistics.

Other comments

21. A few further unsolicited comments were received on related matters. UKPISG noted especially the comments made about the Teaching Excellence Framework (TEF), which aligned with its own awareness that work on the TEF is likely to be rapid and will have implications for, or overlap with the work of UKPISG.

Summary of UKPISG's response and next steps

UKPISG will keep considering the right interaction between UKPISG's review of the UKPIs and the possible use of UKPIs or similar metrics in the Department for Business, Innovation and Skills' development of the TEF. The Department's representation on UKPISG and UKPITG, at strategic and officer level respectively, will facilitate engagement and aid effective management of any overlaps between the two areas of work.

UKPISG has reiterated its original position of December 2013, that fully implementing the recommendations of the fundamental review of UKPIs would take time and need to proceed in stages.

While UKPISG has continued with in-depth reviews of the WP and Research UKPIs, it notes that work to review the Retention and Employment UKPIs is unlikely to start in 2016.

Annex B: Analysis of responses to the ‘Invitation to comment on future changes to the UK Performance Indicators’

Introduction

1. The July 2015 ‘Invitation to comment on future changes to the UK Performance Indicators’ (HEFCW [W15/14HE](#)) sought feedback on proposals about changes to be implemented in the 2016 publications of the UK Performance Indicators (UKPIs). The background to the UK Performance Indicators Steering Group’s (UKPISG’s) engagement in dialogue with stakeholders on these matters is outlined at Annex A.
2. UKPISG did not ask for quantitative responses on a ‘strongly agree’ to ‘strongly disagree’ Likert scale. In its analysis of the 54 responses, the UKPISG secretariat has considered the quality of the arguments advanced rather than making a simple numerical count. An attempt has been made, however, to indicate the proportion of respondents showing support or opposition to the proposed approach, while mostly emphasising the nature of the comments received. Not all respondents commented on every proposal.

Table 1: Numbers of respondents by type

| Respondent type | Number of responses |
|----------------------------------------------------------------------------------------|---------------------|
| English HEIs | 33 |
| English APs | 2 |
| Scottish HEIs | 4 |
| Welsh HEIs | 6 |
| Northern Irish HEIs | 3 |
| English FECs | 4 |
| Group of English FECs (representing the views of a group of five local colleges) | 1 |
| Public body | 1 |

Note: ‘HEI’ = ‘higher education institution’ ‘AP’ = ‘alternative provider’; FEC = ‘further education college’.

Coverage and scope

The proposals

3. UKPISG agreed that higher education registered at further education colleges (FECs), sixth-form colleges and alternative providers should be incorporated into UK Performance Indicator measures at the earliest opportunities.

Comments on coverage and scope

4. Approximately two-thirds of respondents (36 respondents) commented on the proposed coverage and scope of the UKPIs; of these some 90 per cent (32 respondents) welcomed, supported or agreed with the proposal, and only one directly questioned the 'appropriateness' of the proposal. However, a number of respondents who supported the proposals raised queries about the proposal's possible impact on benchmarks published in the UKPIs. Paragraphs 5 to 7 below elaborate on the arguments advanced.
5. Several respondents suggested that the data for different types of higher education (HE) provider should not be aggregated, so that valid comparisons of benchmarks could be made on the basis of data for 'similar' institutions. In a similar vein, it was suggested that HE provider type should be clearly distinguishable, enabling the data to be split easily by institution type. Providing information about the number of each type of HE provider contributing to an institution's benchmark was also considered useful by some respondents.
6. One respondent raised a concern about the timing of the publication of UKPIs incorporating provision registered at alternative providers (APs). It was considered unlikely that the Higher Education Statistics Agency (HESA) data relating to APs, and becoming available for use in 2016 publications (relating to academic year 2014-15), would be of sufficient quality and coverage to facilitate their inclusion.
7. A couple of respondents raised concerns that UKPIs for college-based HE provision might not be wholly accurate and reliable, if they are to be reported against the institution at which the student is registered rather than the institution through which the provision is delivered. Contrary to the decision taken by UKPISG (that UKPIs will continue to report on the institution at which a student is registered), it was suggested that UKPIs based on the institution delivering the provision would be of greater benefit in driving forward improvements. It was also requested that incorporation of HE in further education (FE) provision in the non-continuation measures takes full account of students transferring between higher education institutions (HEIs) and FECs.

Widening participation

The proposals

8. The widening participation (WP) indicator based on National Statistics Socio-economic Classifications (NS-SEC) 4 to 7 will appear for the last time in the 2016 publication of the widening participation UKPIs: it will not be in 2017 and subsequent UKPI publications.
9. The development of widening participation indicators based on the following measures and priorities has been explored in the second half of

2015 by the UK Performance Indicators Technical Group (UKPITG), with the ambition of publishing at least some of them as 'experimental statistics' in 2016:

- schools with low numbers of pupils progressing to further study
 - proportions of entrants from different school or further education institution types
 - pupils in receipt of free school meals (with particular consideration of the extent to which variations in eligibility criteria for free school meals across the UK nations may be considered fundamental)
 - household residual income of entrants to higher education.
10. UKPITG will also explore the development of nation-specific measures of area-based disadvantage for possible introduction to the 2016 publication of UKPIs.

Respondents' comments on widening participation

Removal of UKPI based on NS-SEC 4 to 7

11. Approximately three-quarters of respondents (40 respondents) commented on the proposal to remove the widening participation indicator based on NS-SEC. Of these respondents, the direction of comment indicated that 60 per cent (24 respondents) welcomed, supported or agreed with the proposal, while 15 per cent (six respondents) disagreed with it. The remaining 25 per cent (10 respondents) of those who commented on the proposal raised queries or comments without specifically supporting or disagreeing with the proposal.
12. Of the 26 per cent (14 respondents) who did not comment on the proposal specifically, five respondents welcomed, supported or agreed with the changes to the WP indicators more generally.
13. Among the respondents supporting the proposal, there was a suggestion that it would be preferable to have both NS-SEC and the new experimental WP indicators published during a transition period, until the new UKPIs have had time to become fully established. A number of respondents indicated their support for the proposal that alternative measures of students' social backgrounds be developed over the longer term as a replacement for NS-SEC, and suggested measures focused on economic and social deprivation.
14. Among the respondents who disagreed with the removal of the NS-SEC indicator, there was a suggestion that UKPISG should instead take steps to improve the quality of the data underpinning this measure, for example by working with UCAS to increase the response rate and reliably code the parental occupation question against NS-SEC classes, or by combining NS-SEC with 'low-participation neighbourhood' or 'first in family' criteria to give more robust measures. One respondent raised strong concerns that the removal of the NS-SEC indicator would prevent the monitoring of

outcomes for students from working-class backgrounds. This aligns with a sense from another respondent that, as an individual measure of disadvantage, NS-SEC had some value relative to other group-based WP indicators, and with the view of another respondent who felt that rural poverty and disadvantage, in particular, were not measured effectively through other measures.

15. A number of respondents sought clarification about whether NS-SEC data would continue to be collected by UCAS and returned to HESA. In particular, the use of this indicator in access agreement and other institutional monitoring and targeting was highlighted by some respondents, who felt the loss of continuity was a retrograde step.

Development of experimental statistics

16. Half of all respondents (27 respondents) either specifically indicated that they supported the development of a new, wider set of widening participation experimental statistics, or made supportive comments about a number of the individual proposals. The remaining 50 per cent made observations or queries about the introduction of the experimental statistics, with a few opposing specific aspects of the proposals.
17. Key comments about the development of experimental statistics included the following:
 - a. Some respondents felt that new UKPIs should adhere to some specific principles. (The nature of these responses, and the principles described, indicate a potential lack of awareness of the principles already established for UKPIs.)
 - b. Most respondents who commented here felt that experimental indicators needed to be clearly contextualised and published as a distinct set of statistics, separate from the current UKPIs. (This will be the case.)
 - c. A number of respondents expressed concern that the proposed experimental indicators are based on 'schools data', whereas a significant proportion of entrants to higher education are not direct school leavers. Respondents indicated that they would welcome measures that were relevant to mature, part-time and distance-learning students. The potential to examine low prior educational qualifications or occupational status was mentioned by one respondent.
 - d. Alternative measures suggested by respondents included: a student being the first in their family to access HE; indicators for retention, success and progression of WP students – including degree outcomes and employment outcomes for students in receipt of Disabled Students Allowance and from disadvantaged backgrounds; learning gain and value added; measures based on the Indices of Multiple Deprivation (IMD) and Income Deprivation Affecting Children; pupil premium eligibility; ethnicity; disability; housing tenure or type; and an indicator

to examine the effectiveness of the Level 3 integrated pathway in access to HE.

18. A number of respondents indicated that they would appreciate clarification from UKPISG about where the underlying data to be used in the new indicators would be sourced, and how institutions would be given access to this data. Several respondents advocated the use of existing data collection mechanisms, so as not to increase the data burden on institutions. A few respondents highlighted the importance of HE providers having access to the data about the students they are trying to recruit at an early point in the planning cycle, to monitor widening participation targets in real time. A number of English respondents suggested that UKPISG should work closely with the Office for Fair Access as the existing WP UKPIs are extensively used in institutions' access agreements.
19. Several respondents noted that it would be important to provide further information and consultation about how these UKPIs might be used in the development of the proposed Teaching Excellence Framework.
20. One of the Scottish respondents suggested that UKPITG should take into consideration the work of the Scottish Government's Widening Access Commission, due to report by spring 2016.

Schools with low numbers of pupils progressing to further study

21. Almost half of all respondents (44 per cent, 24 respondents) specifically commented on the proposal to develop experimental statistics based on schools with low numbers of pupils progressing to further study. Of those who commented on this proposal, 46 per cent (11 respondents) indicated that they broadly supported developing this as an experimental statistic, 42 per cent (10 respondents) neither strongly supported nor rejected this, and 13 per cent (three respondents) had issues with its use.
22. Of the 30 respondents who did not specifically comment on this indicator, 13 welcomed the widening participation proposals more generally.
23. Some of the comments supporting the proposal indicated that the resultant UKPI could provide institutions with supporting data for use in contextual admissions, as well as allowing them to better target their outreach and schools liaison work.
24. Among the three respondents who raised concerns about this an experimental statistic, there was a suggestion that the data likely to be used as the basis for this statistic was not of sufficient quality, being incomplete and poorly maintained. Some respondents were concerned that the data for this experimental statistic would only capture the 'previous institution' attended, which might be an FEC attended for repeating or sitting A-levels rather than the post-primary school attended over a number of years. One respondent was concerned that the locus of responsibility for interventions and progress rests predominantly with schools and the

Department for Education, and was therefore out of the direct control of HEIs and their interventions.

25. Four respondents highlighted the regional variation in the numbers of local schools with low progression rates; another commented that progression rates are likely to be heavily influenced by pupils' exam results. These respondents suggested that such differences would need to be taken into account in benchmarking or contextualising the indicators. A couple of respondents advised caution that schools who were performing well in the context of high levels of disadvantage were not inadvertently discriminated against.
26. Many respondents sought further clarification from UKPISG about how this indicator would be measured. Areas where clarification was sought included:
 - a. The definition of 'further study' and whether this indicator would track all post-16 progression routes, including 11-16 schools whose pupils then transfer to post-16 providers for Level 3 study, or relate only to those students progressing from institutions providing post-16 education.
 - b. Where the school destinations data for this measure would be sourced, and how frequently the classifications of schools would be updated (as there could be a time lag for rapidly improving or failing schools). Controlling for the size of the school would also be necessary.

Proportions of entrants from different school or FE institution types

27. Almost half of all respondents (43 per cent, 23 respondents) specifically commented on the proposal to develop experimental statistics based on the proportions of entrants from different school or FE institution types. Of those who commented on this proposal, 26 per cent (six respondents) indicated their broad support for this indicator, 22 per cent (five respondents) indicated that they had issues with the proposal, two of these being sufficiently strong to indicate opposition, and the remaining 52 per cent (12 respondents) commented without firmly supporting or disagreeing with the proposal.
28. Of the 31 respondents who did not specifically comment on this indicator, 45 per cent (14 respondents) had welcomed the widening participation proposals more generally.
29. Respondents from Northern Ireland identified a concern that this UKPI would not be relevant because of the structure of the post-primary education system in Northern Ireland.
30. Some of the wider concerns raised about this proposal included the following:

- a. The measure might reveal more about the educational structure of the recruitment area than about the institution, in which case the context would need to be made clear if this statistic was to be a useful measure, and benchmarks would need to be adjusted for location. Because of these differences in educational structure it was unclear how comparisons of this nature would be helpful nationally.
 - b. The indicator might not prove sufficiently nuanced to be an effective measure of widening participation or disadvantage as it would not provide information on the profile and background of the students recruited from each school type. It was also suggested that the measure might give little indication of the performance of individual schools.
 - c. There could be difficulties in classifying school types when schools can convert from one type to another or change names.
31. Several respondents requested further clarification from UKPISG about the definition of 'different school types', how the information about school type would be captured and coded, and how this indicator would fit in with the existing state school indicator.

Pupils receiving free school meals

32. Approximately half of all respondents (28 respondents) specifically commented on the proposal to develop experimental statistics based on pupils receiving free school meals. Of those who commented on this proposal, 36 per cent (10 respondents) indicated their broad support for this indicator; 43 per cent (12 respondents) raised issues with the proposal, two of these being strong enough to indicate opposition; and the remaining 21 per cent (six respondents) commented without firmly supporting or disagreeing with the proposal.
33. Of the 48 per cent (26 respondents) who did not specifically comment on this indicator, 12 welcomed the widening participation proposals more generally.
34. Several respondents expressed concern about the robustness of using this indicator as a measure of disadvantage, given the disparities between the proportions of students who received free school meals and those who were eligible for free school meals but did not take them up. Respondents expressed a clear desire that, if this measure went ahead, it should reflect the proportion of pupils eligible for free school meals rather than receiving them.
35. A couple of respondents raised concerns about the potential volatility of this indicator, due to its reliance on Government policy and spending in this area. For example, any further extension of the free school meals policy to pupils of all ages, as has happened for all Key Stage 1 pupils in England, could affect the longevity and robustness of this UKPI.

36. Some respondents were concerned about this indicator's emphasis on students coming straight from school, and hence its relevance as an indicator for mature students. It was considered that, without targeted WP intervention, pupils receiving free school meals were less likely than their more affluent counterparts to apply for selective institutions, and that this could be a concern when interpreting the measure. A couple of respondents suggested that eligibility for the Pupil Premium might be considered a better measure to use in the experimental statistics.
37. Further clarification was sought from UKPISG in a number of areas including:
 - a. Detail on how pupils who became eligible or ineligible during their education might be treated within this indicator, and at what point data would be referenced.
 - b. Whether this indicator would include a measure of the length of time a student had received free school meals, or whether eligibility at any point up to the age of 16 would be sufficient to count towards the indicator.
 - c. What source this information would be collected from, and whether and how the data would be made available to institutions.

Household residual income

38. Approximately half of all respondents (26 respondents) specifically commented on the proposal to develop experimental statistics based on household residual income. Of those who commented on this proposal, 42 per cent (11 respondents) indicated their broad support for this indicator, 19 per cent (five respondents) indicated they had issues with the proposal, and the remaining 38 per cent (10 respondents) commented without firmly supporting or disagreeing with the proposal.
39. Of the 54 per cent (28 respondents) who did not specifically comment on this indicator, 13 welcomed the widening participation proposals more generally.
40. Some of the queries raised about this proposal included the following:
 - a. A few respondents had concerns about whether this indicator would be representative of the entire student body, noting for example that this data might not be available for most entrants from higher-income households. One institution commented that over half of its new entrants had not had their household income assessed by Student Finance England. The measure was also felt to have limitations as an indicator for mature students.
 - b. A few respondents commented that household residual income did not equate to disposable income, because of differences in living costs depending on location, and wanted this measure to be adjusted to reflect regional differences.

- c. It was noted that this information is not routinely available until after the admissions process is complete, so one respondent acknowledged that it would not be possible for institutions to use it to provide additional contextual information for recruitment or to target pre-HE outreach work.
 - d. Some respondents were concerned about the use of a non-HESA data source, and the potential for difficulties with collation and the robustness of information.
 - e. One respondent claimed that the measure had been brought into disrepute by the rules about single-parent support, as students only need to declare the income of the parent they are living with even if their other parent is providing support.
41. Areas where further clarification was sought from UKPISG included the following:
- a. Further detail to understand the precise definition of 'household residual income' and how it would be calculated. Some respondents felt that it would be imperative for the measure to align with Student Loans Company definitions and calculations.
 - b. Whether, as one respondent suggested, 'unknown' income should be included in the high-income category and not excluded from the denominator – as parents from high-income backgrounds were more likely to opt out of sharing financial information than parents from low-income backgrounds.
 - c. Confirmation that data protection concerns had been considered, and clarity over any intention to include this information in the HESA student record.
 - d. Detail of the benchmarking approach to be employed for this indicator, and whether benchmarks would be adjusted for location. It was suggested that of the costs of living in different localities and travel costs be considered (in particular for students from rural areas).

Development of nation-specific measures of area-based disadvantage

42. 37 per cent of respondents (20 respondents) commented on this proposal. Of those who commented on this proposal, three-quarters (15 respondents) indicated their general support for this indicator, only one respondent indicated that they had issues with the proposal, and the remaining 20 per cent (4 respondents) commented without firmly supporting or disagreeing with the proposal. A total of 63 per cent (34 respondents) did not comment on this proposal.
43. Several respondents spanning the UK expressed their support for the development of area-based measures which would consider the 40 per cent most deprived, or the bottom two Participation of Local Areas (POLAR3) quintiles. In England, such an approach was said to add value by bringing the UKPIs into alignment with HEFCE's Student Opportunity funding. Respondents commenting in relation to Scotland expressed their

support for the use of Scottish Index of Multiple Deprivation (SIMD) at either SIMD20 or SIMD40 level.

44. One respondent commenting in relation to Wales expressed concern about using Communities First areas as a measure, given the concentration of these areas within specific regions of Wales. Another respondent suggested that students receiving an education maintenance allowance at Level 3 could be added to the information used within the indicator. Support for the use of the Northern Ireland Multiple Deprivation Measure was expressed by those commenting in relation to Northern Ireland.
45. One respondent commenting in relation to England made a suggestion that an alternative geographical proxy based on a smaller scale (for example IMD) might prove beneficial and provide further context. Another respondent queried the intentions of an area-based measure in England, and also whether consideration of an IMD or similar measure might be beneficial in aiding comparability across the UK.
46. One of the concerns raised about this proposal was that the use of different measures by different nations could result in additional complexity for HE providers, and mean students from across the UK were potentially treated inconsistently. An inability to make UK-wide comparisons was also considered unhelpful by some.

Research

The proposals

47. An expert group would advise on the latest issues and interests relating to research, and on new or current measures of research activity that could be of use or interest as experimental research statistics.

Respondents' comments on research

48. 70 per cent of respondents (38 respondents) commented on the proposal to review Research UKPIs. Of those who commented on this proposal, 63 per cent (24 respondents) gave a strong indication of support for this approach, no respondents indicated their opposition to the proposal, and a third (13 respondents) commented without firmly supporting or disagreeing with the proposal. Many respondents indicated that they would welcome the opportunity to be involved in the further development of these indicators.
49. Some of the comments about this proposal included the following:
 - a. A few respondents felt that it would be important for the development of Research UKPIs to acknowledge the wider research environment. One commented on the potential to include college-based HE research in the UKPIs. Another acknowledged the role of applied research in terms of innovation, and highlighted the importance of links between universities, business and industry with regard to research activity. A

third highlighted the role of research UKPIs in facilitating international comparisons.

- b. Several respondents commented on the potential duplication of existing processes or approaches. Consideration of the research assessment undertaken through the Research Excellence Framework (REF) was highlighted in this regard, as was the work of the Snowballs Metrics project.
 - c. The use of standard measures was also commented upon. Some felt that those measures used in the REF (research income and the completion and retention of PhD and research students) seemed sensible, while others highlighted a desire for a balance of input, process and output measures.
 - d. It was considered by many that the method of calculation needed to be transparent and simple, and that research indicators should be developed from existing and preferably annual datasets (some respondents felt that the timeliness of REF measures would be problematic). However, it was also acknowledged that indicators would need to account sufficiently for institutional differences and discipline bias.
 - e. A number of respondents felt that research grant applications should not be included as this could negatively influence behaviours. It was felt by some that success rate by funding source could be a useful indicator. One respondent said that they would welcome the reintroduction of the previous indicators (using Quality-related Research funding as the denominator), to enable like-with-like comparisons.
 - f. Other measures suggested included: those based on field-normalised citations; research degree qualification indicators which included each of home, European Union and international students; measures of return on investment from inputs; diversity measures; and research intensity (in terms of understanding institutional commitment to research and research-informed teaching). One respondent felt that any academic staff indicators should be based on full-time equivalent contracted research.
 - g. One respondent noted that they had developed metrics for measuring research based on the research degree awarding powers guidance, and that they would be happy to share experience with UKPITG if this was considered useful.
50. Respondents were generally concerned that the expert group needed to be fully representative of the differing HE providers across the sector, and indicated that they would welcome further information about the membership of the expert group and its remit.

Other feedback received

51. The consultation responses also included a number of comments which did not relate to any of the specific proposed indicators. Some of the key points are summarised as follows:
 - a. A number of respondents identified a need for measures developed as UKPIs to possess specific qualities. These included: robustness and high quality of data, to be sourced from existing data collections; longevity and alignment with long-term policy interests; clarity of purpose and audience; and the ability to provide benchmarking. (The agreed principles address many of these points.)
 - b. Some respondents recognised the omission of any coverage of the Employment UKPIs and teaching quality measures (referenced in the 2013 fundamental review of the UKPIs). Strong support for review and refinement of the employment UKPIs was reiterated, and the emergence of the Teaching Excellence Framework was cited as requiring the close engagement of UKPISG on a range of matters, including that of previously suggested teaching quality indicators.
 - c. A wish was also expressed to see the membership of UKPITG expanded to include experts on social measures and WP from within HE providers.
 - d. One respondent noted that the administrations in Scotland and Wales already included those with caring responsibilities in their widening access approaches. It was suggested that it might therefore be sensible to establish a broader range of measures for England.

Annex C: List of abbreviations

| | |
|---------------|---------------------------------------------------|
| AP | Alternative Provider |
| FE | Further Education |
| FEC | Further Education College |
| HE | Higher Education |
| HEI | Higher Education Institution |
| HESA | Higher Education Statistics Agency |
| IMD | Index of Multiple Deprivations |
| NS-SEC | National Statistics Socio-economic Classification |
| POLAR3 | Participation of Local Areas |
| REF | Research Excellence Framework |
| SIMD | Scottish Index of Multiple Deprivations |
| TEF | Teaching Excellence Framework |
| UKPI | UK Performance Indicator |
| UKPISG | UK Performance Indicators Steering Group |
| UKPITG | UK Performance Indicators Technical Group |
| WP | Widening participation |