

Our response to the Office for Students' consultation on Data Futures and data collection

Universities UK (UUK) is the collective voice of 140 universities in England, Scotland, Wales, and Northern Ireland. Its mission is to create the conditions for UK universities to be the best in the world, maximising their positive impact locally, nationally, and globally. Universities UK acts on behalf of universities, represented by their heads of institution.

Question 1: Do you have any comments about our preferred Approach 1: Two individualised student data collections a year with reduced data requirements in the first data return?

We welcome the introduction of a new data collection regime. It is an opportunity to reduce the burden on providers where existing requirements are not proportionate. Changing what data is collected and how it is organised will also support more nuanced analysis of the student experience and operation of higher education in England. Access to more timely data will also support the Office for Students (OfS) undertaking its duties. However, changes such as those in the preferred approach must ensure that the burden on higher education providers remains proportionate.

We recognise that introducing two student data collections a year creates opportunities to reduce the burden

There are also some limitations to consider in replacing entry qualification data with the National Pupil Database. Access to this data is not guaranteed for providers, meaning universities would be more likely to gather their own data for the reasons discussed above, which reduces the likelihood of reducing burden on providers. As it only contains data on English students, equivalent data sharing arrangements for students from devolved administrations must be arranged. While the consultation hints at this, it would be important to have a clear plan for accessing this data to ensure alignment across the UK.

The National Pupil Database also does not contain data on all qualifications which

alternative to access this data. For this reason, we support the view that it is not necessary to collect this data in the OfS return.

Question 7: Do you have any comments about our proposals on data quality?

No further comments.

Question 8: Do you have any comments about our proposals on changes to staff data content?

We think it is important that universities record the characteristics of their governing bodies, to ensure sufficient diversity and inclusive representation. We expect that our members will continue to consider this data internally, and therefore are likely to hold this information. However, since this data does not play a role in regulation, we support the view that it is not necessary to have this included in the staff data return. This will enable universities to collect data in formats that best meet their needs.

With regards to reviewing other items on the staff record, we recommend that the OfS explores how data is currently used by the research community. It is important that any changes to the collection of data do not, for example, reduce the ability of its users to monitor equality, diversity and inclusion. Where there are plans to review the HESA staff record, we advise that this is undertaken in consultation with its users, to ensure that its key datasets are maintained.

Question 9: Do you have any comments about our proposals on changes to provider profile data?

No further comments.

Question 10: Are there any other data items where the collection does not appear to be justified?

No further comments.

Question 11: Do you have any other comments on our proposals to make changes to data collection?

Consultations are a vital tool in ensuring the sector can comment on and shape the regulatory framework and associated requirements, which is important in ensuring they are workable and do not require regular updates and future changes. However, if the regulator is to be low burden as described in its strategy for 2022, it needs to reassess how it presents proposals and manages its consultations. The sector is currently handling multiple long and complex consultations with very short timeframes which is holding back meaningful engagement, creating huge demands on the time and resources of staff in providers, and detracting from the education and experience they want to deliver for their students.

We would also note the importance of alignment across the UK in gathering approaches. As institutions have diverse domestic intakes, it is important to be mindful of consistency across the nations where possible, and to consider any unintended consequences of differences in collecting data. This can create additional burden for institutions operating under multiple systems, and generate difficulties in making comparisons across the sector.

Question 12: Do you have any comments about our proposals to make use of linked and third party data?

This is something that we have previously recommended, and we recognise the value of this approach in reducing burden. However, the proposal is relatively open, and we would recommend some form of proportionate consultation with the sector to determine where this is appropriate and any potential risks. This would not require a full consultation such as this, but there needs to be sector engagement to understand the implications. The process must also consider the long term picture, such as whether there are any likely changes to those third party datasets in the future.

It is positive that the OfS is recognising the importance of social media as a way that universities communicate with their students and share content on issues, but, in many cases, email remains the primary mode of communication between universities and students. For example, in the context of student information, we would not want a judgement on a university to be based solely on what was communicated (and when) through social media.

Question 13: Are there aspects of the proposals you found unclear? If so, please specify which, and tell us why.

It is unclear how social media would be used to record reportable events processes. This was also not flagged in the updated reportable events guidance that was subject to consultation. Paragraph 119 notes that the OfS may 'systematically review providers' social media accounts to monitor the timely reporting of reportable events'.

- a. While issues may come to a provider's attention through social media, the OfS