

Public information about higher education

Summary

The University and College Union (UCU) is the largest trade union and professional association for academics, lecturers, trainers, researchers and academic-related staff working in further and higher education throughout the UK. We welcome the opportunity to respond to the consultation on changes to information published by institutions. While UCU believes that students should have straightforward access to good, relevant information about HE courses and institutions, we would challenge the assumption that the Key Information Set (KIS) will fulfil the objective of “informing people about the quality of higher education”. We are also concerned that the KIS, including student satisfaction surveys, reinforces a consumerist approach to higher education. We believe that such an approach short-circuits the educational process and erodes the trust relationship between teacher and student that necessarily defines higher education.

Consultation question 1: Are the three key purposes of public information outlined in paragraph 42 still appropriate? If not, what additional or alternative purposes should a public information set seek to address?

Paragraph 42 lists three key purposes for public information on quality and standards:

- 1** 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.
- 2** As evidence for quality assurance processes in institutions.
- 3** As information that institutions can use to enhance the quality of their higher education provision.

UCU believes that students should have straightforward access to good, relevant information about higher education courses and institutions. However, we would challenge the idea that the Key Information Set (KIS) meets the purposes outlined in paragraphs 42a and 42c. In relation to prospective students one of the difficulties is that there are no valid and reliable measures of educational quality that can be used to compare different courses, subjects and institutions. This is one of the conclusions of the report for HEFCE on Enhancing and Developing the National Student Survey (NSS):

"The design of the NSS means that there are limitations on its use for comparative purposes ... In particular, its validity in comparing results from different subject areas is very restricted, as is its use in drawing conclusions about different aspects of the student

experience. One issue to be borne in mind is that, in most cases, the differences between whole institutions are so small as to be statistically and practically insignificant” — Enhancing and Developing the National Student Survey: Executive Summary, point 7).

In our view the NSS produces data primarily on how well student customers’ expectations have been managed rather than the quality of academic experience in institutions. The public information agenda also fails to take into account the fact that higher education is a “post-experience” good, i.e. the quality of which can only be fully appreciated a considerable period after graduation.

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?

One of our concerns with the current consultation is that it relies exclusively on the Oakleigh Consulting/Staffordshire University research to develop the agenda for public information. While the Oakleigh research adds to our understanding of ‘user’ information needs it is not the only piece of research on which to develop public policy. For example, a recent review of the NSS by Jacqueline Cheng and Herb Marsh in the Oxford Review of Education concludes that *“at the university level, there are relatively few universities that differ significantly from the mean across all universities and, at the course level, there is even a smaller portion of differences that are statistically significant. This suggests the inappropriateness of these ratings for the construction of league tables” —page 708).*

Similar concerns about the comparability of NSS data are expressed in the second study commissioned by HEFCE ('Enhancing and Developing the National Student Survey', Institute of Education). However, the IoE report is largely ignored in the current consultation document and we are concerned that more critical perspectives on the NSS and employability data are being downplayed in a rush to implement the Government’s agenda.

UCU has major reservations about the usefulness of the KIS in informing prospective students about the quality of higher education. However, if we are to extend the information set we recommend where possible to include in the KIS longitudinal DLHE information, indicating destinations up to three years after leaving.

Currently, HEFCE has developed a KIS for FT students only. In the interests of fairness, UCU recommends that a KIS for part-time undergraduate students is developed as a matter of some considerable urgency, given the current numbers of P/T students and the likely increase in their proportions within the undergraduate population as a whole.

This would be equally necessary to support the longitudinal DLHE information, particularly that on ‘employability’, as P/T students will inevitably have different demographic traits to

F/T students (older, different domestic status, more likely to be in employment), differences that will be even more pronounced in the 'HE in FE' sector.

Given the increasing numbers of postgraduate students UCU would also recommend that HEFCE should consider developing a KIS for post-graduates, and, within that category, urgently consider developing with OfSTED a KIS for post-Graduate Initial Teacher Education (ITE) students. These post-graduate students not only face paying full-cost fees in all but STEM subjects after 2012 but also a new form of school-led ITE initiated by the Secretary of State for Education. Thus far, school-centred ITE (SCITT and EBITT schemes) has not been as well evaluated by OfSTED as the current form of HEI-led ITE partnerships with schools, which have received excellent recent judgements.

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

We support linking the KIS to the UCAS web-site. It will also be important to make sure that the KIS is linked to HEI websites as significant numbers of applicants do not apply through the UCAS route.

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 will be important to dovetail as far as possible the gathering and production of relevant data, so that it is available in time to inform prospective students in applying for a place in higher education.

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?

It is too early to assess the impact of the new employability statements on student choice. However, most of the statements are very similar and so it is difficult to see how students will be able to make informed judgments between different HEIs.

A more general concern voiced by UCU members is that by focusing solely on 'employability' universities risk diverting attention from broader educational goals around personal development, citizenship and developing a more critical outlook on society. We also have a number of reservations about the alleged relationship between employment outcomes and the quality of the higher education experience (see below).

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.

We have major concerns about the use of employability data, in particular, the proportion of students employed in a full-time professional or managerial job in the first year after completing the course and the average salary in the first year after completing the course, as valid indicators of the quality of higher education. This proposal seems to imply that HEIs and their staff can somehow be held accountable for the occupation and salary that students access a year after graduation. Such proposals:

- proved difficult to action in the USA
- would require unambiguous linkages between education and labour markets which are difficult to theorise (except demand for some professional roles, e.g. teachers and nurses) and even more difficult to effectively operationalise
- do not fit the nature of national labour markets which are always changeable and currently volatile, increasingly subject to ever-changing global labour market pressures where the trend is to push down the price of highly skilled intellectual labour
- would in no sense explain why the fastest growing sub-category within current NEET statistics is for 18 to 24 year olds with 3 A Levels and/or a degree
- fail to take into consideration the equality dimension of graduate 'employability'.

In terms of a wider information set, UCU recommends including data on full-time equivalent student: staff ratios (SSRs) at the course level. This data is required at course level by some accrediting bodies. We recommend that this is extended across the sector. Universities UK says that increased tuition fee payments have been used to reduce the student:staff ratio

(<http://www.universitiesuk.ac.uk/Publications/Documents/MakingItCount.pdf> p.3). There needs to be evidence for this at the course level. In addition, UCU recommends that the SSR is calculated using TRAC data on the use of academic staff time, reflecting the proportion of time spent on teaching and teaching-related activities by academics whose contract or primary employment function combines teaching and research. This is needed to give a realistic picture at the course level of the relative amounts of staff time spent on teaching and student support. UCU questions the accuracy of the data behind current SSR statistics which are provided by the Higher Education Statistics Agency: in calculating the SSR HESA does not remove from the calculation the amount of time spent on research by academics combining teaching and research.

It might also be possible to improve the collection of data relating to the services that support student learning, for example, library facilities, and particularly size of library holdings and availability of professional library staff to advise students. There is a question in the NSS about satisfaction with library facilities and we are concerned that, without

more independent or more methodologically sound data, the survey risks using solely subjective survey data.

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?

UCU believes that there must be proper consultation with the sector on changes to the information set. At the moment, academic and academic-related staff are inadequately represented on the HEPISG and the QHE Group and therefore it is vital that practitioners are able to refine the data on the basis of their experience.

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?

We support the proposal developed by the Institute of Education research for student unions to be able to nominate one optional question bank in their institution's NSS. In addition, we believe that there should be opportunities for academic and academic-related staff to have a meaningful role in reviewing the quality of their institutions. This means a movement away from quantitative indicators and league tables in favour of more qualitative, practitioner-led judgements. For example, we believe that one of the best ways to encourage good teaching is by using developmental and negotiated forms of peer observation.

We also believe that staff and students require a shared understanding of what constitutes 'quality' HE outcomes and how they are arrived at through assessment. All students need an effective understanding of 'summative' and 'formative' assessment and of how all forms of lecturer feedback support formative assessment but require active engagement and reflection by the student.

Clearly, these shared understandings need to happen at the beginning of a degree course, during subject-based induction. We would suggest that an induction procedure should also always include an overview of the whole course in terms of how it structures teaching and learning incrementally to support what students need to know, understand, make or do to achieve their degree.

Similarly, the necessary communication techniques required to present work should be included: referencing systems, report and essay writing standards, demonstration techniques, etc, all the means by which students work - their developing knowledge, skill, understanding, making and doing - is assessed.

We recognise that none of these complex requirements can be captured by the type of public information datasets envisaged in the KIS. However, this highlights the importance of alternative ways of supporting student learning and assuring quality in UK higher education.

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

UCU is concerned that the KIS agenda, including student satisfaction surveys, reinforces a consumerist approach to higher education (most evident in the Independent Review of Higher Education Funding & Student Finance). The Browne report argues that 'student choice will drive up quality,' and that the measure of quality is 'student satisfaction'. We believe that such an approach:

- Short-circuits the educational process. A dissatisfied student 'customer' becomes 'proof' of institutional failure, positive student satisfaction results 'proof' of institutional success.
- Hollows out what it purports to assess as students are often unable to distinguish between inadequate and quality education: the ability to discriminate and assess the quality of an academic experience is primarily produced through experience gathered over time, predominantly by practitioners' professional reflection on their pedagogy.
- Assumes a conflict of interest between the 'student customer' and the education 'service provider' which erodes the trust relationship between teacher and student that necessarily defines higher education.
- Pushes students into regarding their education as a commodity that must fundamentally represent 'value for money', channelling students into predominantly complaining about dissatisfaction with marks for essays, examinations, projects, grades awarded and degree classifications.

Practitioners are concerned that the KIS will result in more opportunities for universities to "mis-sell" their courses by reference to spurious league tables. The current consultation document does not go far enough to prevent universities adopting these types of practices. We, therefore, call upon HEFCE and Universities UK to adopt a code of practice on the use of information to regulate the way such information is used.

Similarly, UCU is concerned about the interaction between a new quality assurance framework (within which a judgement will be made on each institution's KIS, presumably by the QAA), the proposed HE Charters and the National Student Survey (NSS), especially as the recent research commissioned by HEFCE from the London Institute of Education referred to on page 2 of this response, found that the NSS was inadequate as a comparative methodology between HE institutions.

Likewise, UCU would like a clearer understanding of the QAA judgement on an HE or HE in FE institution's KIS: will it be about the accuracy or the relevance of the KIS?

Finally, there is no real data to be derived from the KIS on widening participation to HE, either for the university sector or the HE in FE sector: why is such an opportunity being missed?

Overall, we believe that the greatest threat to the quality of teaching and learning will be lack of public investment rather than inadequate public information. In our view, what Professor Roger Brown has described as “conscientious professional practice in an adequately funded system” remains the best way to ensure the quality of higher education. We, therefore, call on HEFCE and Universities UK to articulate the case for core public funding for higher education teaching.