

Office for
Students



Office for Students data strategy

2018 to 2021

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Introduction

1. This document sets out how the Office for Students (OfS) will use data to support our regulatory responsibilities for the period of the first OfS strategy, 2018 to 2021. Over this time, as we continue to develop our regulatory approach, we will in parallel shape a longer-term data strategy for 2021 and beyond.
2. This is, therefore, a data strategy in development. It describes our high-level approach to collecting and managing data, and the sorts of behaviours that students, higher education providers and others can expect from us. It also outlines our plans to deploy a wide range of data, while making clear our expectation that our use of data will evolve significantly over the coming years.

Our vision

3. Our vision for data is:

The OfS is an evidence based regulator. This means we will use data and information to inform our effective, efficient and intelligent regulation in the student interest.

4. We will be drawing on a wide range of data and information to help us fulfil our regulatory functions. It will need to be sufficient to support us to:
 - a. Establish and monitor a set of lead indicators to understand provider performance and regulate in a proportionate and risk-based way.
 - b. Target, evaluate and improve access and participation, and equality and diversity activities.
 - c. Monitor the sector as a whole, to understand trends and emerging risks at a sector level and work with the sector to address them.
 - d. Ensure students can access reliable and appropriate information to inform their decisions about whether to study for a higher education qualification and, if so, identify which provider and course are most likely to meet their needs and aspirations.
 - e. Work with employers and with regional and national industry representatives to ensure that student choices are aligned with current and future needs for higher-level skills.
 - f. Operate the Teaching Excellence and Student Outcomes Framework (TEF).
 - g. Support registered higher education providers in meeting their transparency conditions.
 - h. Support the Department for Education (DfE) to fulfil its overall responsibility for the policy and funding framework in which the sector operates, and other public bodies such as UK Research and Innovation (UKRI) in the delivery of their prescribed functions.

How we will use data

5. Data plays a critical part in our work to meet our four primary regulatory objectives and deliver what students, the public and government expect of the OfS.

The four primary regulatory objectives

All students, from all backgrounds, and with the ability and desire to undertake higher education:

1. Are supported to access, succeed in, and progress from, higher education.
2. Receive a high-quality academic experience, and their interests are protected while they study or in the event of provider, campus or course closure.
3. Are able to progress into employment or further study, and their qualifications hold their value over time.
4. Receive value for money.

6. Effective and intelligent use of data will allow us to anticipate where there is a risk that our regulatory objectives may not be met, and help us mitigate those risks. For example, it will allow us to understand and take action where:
 - barriers to access and student success exist
 - quality may drop below the high standards we require
 - students are not achieving the outcomes that they should or the value of their qualifications may not be maintained over time
 - students and the taxpayer may not be receiving value for money.
7. We will use data to support the following activities, set out in our regulatory framework:
 - registration and ongoing regulation of individual higher education providers
 - validation, degree awarding powers and university title
 - sector-level regulation
 - intelligent regulation – understanding students, the sector and our effectiveness.
8. Education, and higher education in particular, is a data-rich environment with a strong heritage of leveraging data to gain insights and drive behaviour. The rich datasets and existing knowledge – coupled with significant advances in data science over recent years – open up exciting opportunities to use data in new ways to garner greater insights and regulate more effectively. In this strategy we set out some of the ways we will use data for each regulatory activity, recognising that these will evolve during the lifetime of this strategy.

9. We expect our requirements to evolve over the lifetime of this strategy, and we will regularly review our use of data. We, or the designated data body (DDB)¹, the Higher Education Statistics Agency (HESA), will consult on any significant changes we propose to make to the data we require from providers.

How we will collect and share data

10. We will collect data in a number of ways: through data returns from providers, annual surveys, data sharing with other bodies, and bespoke requests. In doing so we will work closely with HESA, which will support us by combining its expertise in data collection and dissemination with ours to ensure that these activities are as efficient and effective as possible.
11. Data is an asset not only for the OfS but also for providers and the wider higher education community. We are committed to publishing as much of our data and analysis as possible. We will also encourage providers to use their own data alongside that published by us and by HESA to inform their work to improve their students' experience, especially in the areas of access and participation. We will actively consider the needs of providers alongside those of students and employers when deciding what data should be published.
12. Effective regulation requires up-to-date data. The OfS needs to be able to anticipate challenges to the sector or individual providers in order to take timely regulatory action. Much of the currently available data about higher education providers and their activities is at least a year out of date. HESA is undertaking a programme, which will conclude in 2020, that is designed to deliver high-quality in-year data that meet the needs of a wider range of stakeholders. This will enable us to anticipate individual provider- and sector-level challenges and take action as required.

What we mean by 'data'

13. We interpret data in the broadest possible sense. For us data includes:
- structured data returns from individual higher education providers to HESA, the OfS, the Education and Skills Funding Agency (ESFA) and other bodies
 - administrative data collated by others such as the Student Loans Company (SLC), UCAS and DfE
 - qualitative and textual data such as that collected through surveys of students and stakeholders, and providers' access and participation plans
 - unstructured and big data from sources such as social media and web analytics.
14. In addition to the education-specific data sources listed above we expect to make use of data from the Office for National Statistics and similar organisations to help us understand the

¹ A body that performs the duties set out in sections 64 and 65 of the Higher Education and Research Act 2017, including data collection, data processing, data storage, data publication and provision. The DDB is designated by the Secretary of State following consultation and a recommendation from the OfS.

social, demographic and economic context within which higher education is operating. We will also use data from overseas where this can give us insights.

15. This strategy identifies a range of new analytical outputs that we will use to inform our regulation of providers and the sector. These draw on existing data, or on new data that is not sourced directly from providers. This should help to reduce the overall data burden on providers.
16. Annex A provides a list of the data sources we currently expect to use in 2019-20.

Reducing burden

17. The OfS is committed to reducing the regulatory burden on providers. We believe that intelligent analysis and interpretation of data will enable us to protect the student interest without the need to use more burdensome regulatory approaches. The datasets we collect, either directly or via HESA and the ESFA, will be clearly linked to our regulatory objectives and activities. We will only require providers to make data returns where there is a clear regulatory requirement.
18. In determining our data requirements we will not presume that data that has previously been collected is still needed. We have already established that providers will not have to provide the following datasets which were required by HEFCE under the previous system:
 - HESA estates management
 - inclusion of non-academic staff on the HESA staff record
 - value for money reports
 - the Higher Education in Alternative Providers Early Statistics survey (HEAPES).

As we review our funding methods we aim to reduce reliance on aggregate in-year returns such as the Higher Education Students Early Statistics survey (HESES).

Our approach to data and its use

19. Our approach to data is underpinned by a number of principles:

- Ethical behaviours and compliance
- Transparency
- Robust and innovative analysis
- Reducing burden and working with others
- Quality.

Ethical behaviours and compliance

20. Students and others place trust in us to use data securely and appropriately. Most of the data we process relates to individual students. We will treat it with the utmost care and apply best practice in data management, including a commitment to retain data only as long as is necessary.
21. Where we share data with third parties in support of our regulatory activities, we will only do so where we can be sure that the rights and privacy of individuals are assured. We will ensure that those that process students' data on our behalf operate to the same high standards. Our uses of data should never go beyond those that students might expect from a responsible regulator acting in their interests.
22. The OfS is a producer of official statistics. This means, among other things, that we adhere to the Code of Practice for Statistics², and to its three overarching pillars: trustworthiness, quality and value. We are committed to ensuring that the statistics that we publish are high quality, can be relied on by users, and deliver value by responding to users' changing needs and reflecting changes in the sector we regulate.
23. We believe that trust in statistics is increased by making them equally available to all; this is underlined by our commitments to transparency. We will limit pre-release access to statistics to those who genuinely need it; in particular, we do not expect to routinely give providers privileged, or pre-release, access to statistics.

Transparency

24. Transparency is a key feature of effective regulation and of good data practice. Trust and confidence in data and statistics are increased by making them publicly available. This is therefore central to our approach.
25. We are committed to publishing as much of our data and analysis as possible. Unless there are very good reasons not to, we will publish the measures that we generate to inform our decisions. This includes TEF metrics and the data which underpins our assessment of provider compliance with the quality registration conditions. Subject to the outcome of our consultation on access and participation³, we will also publish the access and participation dataset. We think that all of these will be of interest to a wide range of stakeholders, so will publish data covering all registered providers, not just those participating in TEF or submitting an access and participation plan.
26. In some circumstances it would not be appropriate for us to publish data – in particular, where commercial sensitivity is an issue, or where publication could mislead because our regulatory judgements draw on significant evidence beyond the indicators. But we will keep this and other data under active review, with the aim of considering how and when we might be able to make

² See www.statisticsauthority.gov.uk/code-of-practice/.

³ See 'A new approach to regulating access and participation in English higher education: Consultation' (OfS 2018.33), available at www.officeforstudents.org.uk/publications/a-new-approach-to-regulating-access-and-participation-in-english-higher-education-consultation/.

it available – for example, by releasing it at an aggregated level, or at a later date – where there is a public and student interest in doing so.

27. We support HESA's open data strategy⁴, and expect HESA to make even more of the data it holds available so that anyone with an interest in higher education can access it. We will work with HESA and the ESFA to ensure that data from all OfS-registered providers is available from a single source and compiled with consistent definitions and quality standards.
28. We recognise that making large volumes of data available risks creating an unwieldy and confusing data landscape. We will also work with HESA and others to ensure that the data we collectively publish is clear and easy to navigate by being consistent in what we do and avoiding duplication.
29. This forms part of our wider aim to make the data and analysis we publish as accessible and user-friendly as possible. We will think creatively about how best to do this, including exploring the potential of new technologies, and recognising that different audiences have different preferences and needs that we must understand and reflect.
30. We will always explain why we are asking for data, and the uses to which we intend to put it. We will also be transparent about the algorithms we use in our work, and share other information and analysis with providers to help them understand how we use their data. In this way, we hope to improve the focus, quality and integrity of the data we are requesting.
31. We are aware of the need to identify and address any unintended consequences of our approach to transparency. While we have confidence in providers' commitment to producing robust, reliable data, we need to be able to satisfy ourselves that it accurately represents tangible progress in delivering outcomes for students and society. This being the case, we will reflect carefully on providers' engagement with and response to the metrics we define. We will further mitigate any risk by expecting them to comply with the supply-side code of practice developed by the Data Landscape Steering Group⁵. Where breaches or concerns are identified, we will take prompt action.

Robust and innovative analysis

32. We will apply the highest standards of professionalism to all our data and analysis work. Where we undertake research and evaluation, we will explain how we have reached our findings, and we will engage willingly and constructively with those who wish to understand or challenge them.
33. Data science is constantly evolving. Great strides have been made in recent years, and considerable insights can be gained from the application of new techniques to existing and new data sources. We regularly review the data sources and methodologies we use to ensure we are using the best tools and techniques.
34. 'Big data' sourced from the web, coupled with machine learning, has the potential to contribute to the development of our lead indicators of risk, and we are looking at how such data and

⁴ See www.hesa.ac.uk/innovation/open-data.

⁵ See www.hesa.ac.uk/innovation/data-landscape/Codes-of-practice/supply-side.

technologies could support our regulatory activity. We will also look to other regulators, both in the UK and overseas, to see how they are using data to improve their effectiveness, and learn lessons from what they are doing.

35. The higher education sector is diverse. It serves a wide range of students, offers a wide range of provision, and includes different types of provider. Wherever possible, we will try to accommodate this diversity in the way we collect and use data. We will, however, need to balance this with the need for comparability. In reaching judgements about providers, we must be able to use measures that can be applied fairly and consistently.
36. We know that our ability to understand and assess the performance of small providers through data alone may be limited, but it is nonetheless valuable. In addition to its value in regulation, data from small providers will help us to understand the impact they are collectively having on students. As such, we will expect them to make broadly similar data returns to their larger counterparts.
37. We will also look to benchmarking techniques to allow us to understand the extent to which provider or student outcomes may be attributable to factors other than those we are seeking to assess. We will shortly be publishing a review of benchmarking to ensure that the techniques we use remain fit for purpose. However, benchmarking will not always be appropriate. For example, in judging a provider's performance against our requirements for initial and ongoing registration, we will look at its absolute performance to ensure it meets the high standards we expect.
38. We recognise the value of structured and unstructured data, and the increased insights that can be gained by combining quantitative and qualitative data and analysis techniques. We will deploy combinations of different types of data from disparate sources to improve the quality and effectiveness of our regulatory decisions.
39. New data sources such as Longitudinal Education Outcomes (LEO) demonstrate the value to be gained by following individual students through their educational journeys and beyond. Wherever possible, we will use linked datasets to improve our understanding while reducing the burden on students and providers. In particular, linked datasets can give us significant insights into the barriers to student success, for example by helping us better to understand the intersectional nature of disadvantage. UCAS has already developed a multiple equality measure, and is collaborating with us to further develop this work.

Reducing burden and working with others

40. The OfS is committed to being a low-burden regulator. We know that data return requirements can be resource-intensive, especially for small providers, and we will always seek to minimise our requirements where possible, commensurate with our regulatory responsibilities.
41. We will only request data in support of our functions, including our role in supporting the data needs of DfE and UKRI. Our requirements will vary according to the benefits providers wish to access: providers in the 'Approved (fee cap)' category are likely to face more data demands than those in the 'Approved' category. While we will aim to minimise the data we require providers to return on a statutory basis, we will support providers and HESA in voluntarily working together to collect wider datasets that can support providers and other stakeholders.

42. In defining our requirements we will consider the data needs of other stakeholders in addition to those of DfE and UKRI. This integrated approach should help to reduce burden on the sector. We will work with partners in the devolved administrations to ensure that, as far as possible, UK-wide data remains available. This means that students making choices about what and where to study will benefit from consistent information.
43. We recognise the cost of change and the value of consistency over time. In meeting our regulatory requirements, we will always consider whether the value delivered by change outweighs its cost.
44. We will review the data we request annually. Where data is no longer required, we will no longer ask for it.
45. We will introduce new data requirements and changes cautiously and infrequently, because we know that they can be particularly burdensome for providers. We will also collect data in a way that allows us to repurpose it to meet our emerging requirements, rather than making additional requests. In general, we will collect individual student rather than aggregate data – it can be re-analysed and linked to other data to answer new questions, and give new insights, in a way that aggregate data cannot. Where we do make changes, we will give providers as much notice as possible, although we will not hesitate to act quickly where collecting new or different data will improve our effectiveness in supporting students' interests.
46. HESA's Data Landscape Steering Group, on which the OfS is represented, has established a demand-side code of practice⁶ that encapsulates best practice for those organisations that require data from providers. This demand-side code sits alongside a supply-side code that governs providers' behaviours in respect of data. We expect providers to adhere to the supply-side code, and as part of this compact, we have subscribed to the demand-side code of practice. Given the pressing need to confirm our requirements for 2019-20 we have not been able to conduct detailed burden assessments on all of our requirements.
47. The burden of data collection is generally reduced where the data required relates directly to the business of providers, and increased where it does not. For this reason we will only ask providers for data that we cannot reasonably obtain elsewhere. For example, HESA student records currently ask for details of students' prior qualifications. However, since the DfE already holds this information for most students, we are considering whether we could use this data instead and therefore discontinue its collection on the HESA record.
48. Organisations such as UCAS, the SLC and the ESFA also have extensive data collections which we will draw on rather than collecting data directly from providers. We will work with the ESFA to ensure that the data it collects on individual students at further education colleges can meet our needs, thereby ensuring that colleges only need to return individual student-level data to one body. The sharing and repurposing of data is enhanced by the use of common data standards and definitions. We will, wherever possible, therefore use common definitions and standards in preference to creating our own.
49. We are committed to using linked data wherever possible to reduce the burden on providers and increase our understanding of the sector. For example, we might use linked data to

⁶ See www.hesa.ac.uk/innovation/data-landscape/Codes-of-practice/demand-side.

understand the nature and extent of credit transfer. Linking data will also help providers, particularly in evaluating the effectiveness of outreach work. We will support the sector in this by unlocking linked data including through initiatives such as the Office for National Statistics secure research service⁷ and the Evidence and Impact Exchange⁸.

50. HESA's Data Futures⁹ programme proposes high levels of data sharing. We will work with HESA to ensure that data is only shared where the public and student interest are aligned. Individual students' data must only be used for statutory purposes or in ways we expect them to approve of.
51. We know that providers incur considerable cost in transforming their data to meet the requirements of bodies such as the OfS. We will work with HESA and providers to ensure that, as far as possible, our data requests are aligned with providers' internal systems and processes, rather than cutting across them. It will not be easy to balance this against the need to ensure comparability of data, but we will build in flexibility wherever we can.
52. At this stage, we are still scoping many of our detailed data uses. In order to take timely regulatory actions we will need data in close to real time. We recognise that the timing of data collection affects provider burden. We will seek to balance the time that providers have to prepare their submissions and our need for data on events soon after they occur. We also recognise that administrative data can often be more timely and less burdensome than formal data returns, and our strategy relies on using these sources where possible.

Quality

53. High-quality data is critical to our work to support positive outcomes for students. It is also critical to the work providers do to improve their students' experience and outcomes. We will clearly articulate our expectations around data quality to providers, and we are working with HESA on the development of tools and resources to support them in meeting these expectations.
54. Responsibility for data quality assurance rests with a provider's governing body. Poor-quality data returns are unacceptable, and risk putting a provider in breach of conditions F3 and F4 of our regulatory framework.
55. We will use comparisons with other data sources to inform our judgements and risk assessments of data quality. Some data audits will be necessary to assure ourselves that the data we use is fit for purpose. Our data audits will be selective and normally conducted on the basis of individual provider risk, but we will sometimes need to conduct other, less targeted reviews to inform our overall risk assessments.

⁷ See www.ons.gov.uk/aboutus/whatwedo/paidservices/virtualmicrodatalaboratoryvml.

⁸ See www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/using-evidence-to-improve-access-and-participation-outcomes/evidence-and-impact-exchange/.

⁹ See www.hesa.ac.uk/innovation/data-futures.

56. Providing high-quality data can be difficult and costly. We recognise this, and this strategy outlines the various ways in which we are working to reduce burden, and the costs associated with it, for providers.

How we use data to regulate

57. The OfS's regulatory framework sets out four main regulatory activities¹⁰:

1. Registration and ongoing regulation of individual higher education providers:
 - A: Access and participation for students from all backgrounds
 - B: Quality, reliable standards and positive outcomes for all students
 - C: Protecting the interests of all students
 - D: Financial viability and sustainability
 - E: Good governance
 - F: Information for students
 - G: Accountability for fees and funding.
2. Validation, degree awarding powers and university title.
3. Sector-level regulation.
4. Intelligent regulation: understanding students, the sector and our effectiveness.

58. This section summarises the main data-led activities that underpin these activities. More detail on data sources is in Table 1 of Annex A.

1. Registration and ongoing regulation of individual higher education providers

59. We use data alongside a range of evidence to support a balanced, holistic, risk-based approach to our registration and regulation of providers.

60. Our work to register providers draws on significant amounts of data. To date we have focused on the construction of indicators to assess whether providers meet initial conditions of registration on quality and standards and on financial viability and sustainability. We expect to use similar indicators as part of our ongoing monitoring of registered providers.

61. Most of our existing indicators are historical, and we want to be more forward-looking. We are therefore looking to develop new lead indicators which, by signalling changes in a provider's

¹⁰ See 'Securing student success: Regulatory framework for higher education in England' (OfS 2018.01), available at www.officeforstudents.org.uk/publications/securing-student-success-regulatory-framework-for-higher-education-in-england/.

circumstances or performance, will prompt us to investigate whether it is at increased risk of breaching one or more of its ongoing conditions of registration. Under each of the activities we mention some of the indicators we are currently considering.

62. In this section we set out how we routinely expect to use data. Where we judge providers are at increased risk of breaching their conditions we may ask them for additional, targeted data to support our judgements.

A. Access and participation for students from all backgrounds

Regulatory framework: Conditions A1 and A2 (OfS 2018.01 pp 83-86)

Data sources: Individualised data on higher education students; access activities and targets; student outcomes; pre-application data; application data; data on society, demography and the economy.

63. In approving providers' 2019-20 access and participation plans we have created initial access and participation dashboards that demonstrate how providers are performing on the access measures we care most about. Our consultation on a new approach to regulating access and participation proposed the creation and publication of a more comprehensive dataset in early 2019 that we will use to monitor the performance of individual providers and to allow them to set their own targets¹¹.

B. Quality, reliable standards and positive outcomes for all students

Regulatory framework: Conditions B1 to B6 (OfS 2018.01 pp 87-95)

Data sources: Individualised data on higher education students; student views and attitudes; student outcomes; pre-application data; application data; Office of the Independent Adjudicator data.

64. We have developed a range of indicators to enable us to assess the extent to which providers meet these conditions. Currently, these cover continuation, completion, degree outcomes, and employment.
65. We will continue to improve these indicators and to develop new ones. Over the next year, the completion indicator will be restructured so that it can be broken down by student groups. We will also use data from the National Student Survey (NSS) and future surveys of postgraduates to measure providers' compliance with conditions B1 and B2 (delivery of a high quality academic experience, reliable assessment, and support to succeed and benefit for all the provider's students). In using data in this way we will need to ensure that the surveys have wide coverage, including of students who do not complete their courses. We also intend to use data from the Office of the Independent Adjudicator (OIA) to assess the number and nature of complaints it receives from students.

¹¹ See OfS 2018.33.

66. In the coming weeks we will publish research on the extent to which recent changes in the patterns of degree class can be explained by factors such as changes in prior attainment. This research will be reflected in new indicators designed to explain and assess the extent to which individual providers are ensuring that students' qualifications hold their value over time (condition B4). We expect to publish indicators routinely, and to use them in assessing compliance with this condition. In future it may be necessary to extend this work to other graded awards such as masters' degrees.

C. Protecting the interests of all students

Regulatory framework: Conditions C1 to C3 (OfS 2018.01 pp 96-103)

Data sources: OIA data; complaints received by the OfS; big data and web analysis.

67. We do not intend to collect data directly from providers to support our assessment of compliance with these conditions. Rather, we will use data sourced from elsewhere to support our assessments, including data on the number and type of complaints made to the OIA and the extent to which these are upheld. We will also consider the nature and extent of any issues raised directly with us by students or others.

68. We think that this is an area where social media and the web could provide useful information about individual providers, and we will begin exploring options during 2019-20. We appreciate that this information may be unreliable, and any use we make of it will recognise this.

D: Financial viability and sustainability

Regulatory framework: Condition D (OfS 2018.01 pp 104-109)

Data sources: Financial performance and position; costs of provision; individualised data on higher education students; applications data.

69. We have developed a range of indicators to enable us to assess the extent to which providers meet this condition. We will continue to develop these indicators and financial data as our understanding of the factors influencing providers' financial performance continues to grow. Learning from regulation in the financial services sector, we expect to make more use of 'stress testing' and scenario modelling – for example, we may ask providers to model their financial performance against potential reductions in student numbers forecasts, or predicted increases in pay and pension costs. We may occasionally request scenario modelling at short notice in response to sudden, unexpected and significant change.

70. We will routinely check student application data and individualised student data against provider financial forecasts, as any shortfall in meeting student number forecasts may signal a risk of material adverse changes in financial performance.

E. Good governance

Regulatory framework: Conditions E1 to E5 (OfS 2018.01 pp 110-123)

Data sources: Individualised data on higher education students; OfS systems; accountability returns.

71. Our regulation of provider compliance with these conditions, which relate to management and governance, will rely on our judgements about the documentation that providers submit to us, and the way that a provider behaves.
72. We will regard poor-quality, inaccurate or late data returns and information (whether to us, or to HESA, the ESFA or another body) as an indication of poor management and governance. We will also analyse the timeliness, nature and frequency of the events providers are required to report to us: a pattern of reporting trivial events, or late or non-reporting of significant events, may signal that a provider is not being sufficiently transparent about or aware of the risks it faces.
73. We will examine data on directors to determine where there is shared ownership or control with potential for poor management and governance at one provider being replicated at another.

F. Information for students

Regulatory framework: Conditions F1 to F4 (OfS 2018.01 pp 124-131)

Data sources: Individualised data on higher education students; student views and attitudes; student outcomes; applications data; prospectus data; society, demography and the economy data.

74. We have published details of the data we expect providers to publish and provide to us to meet the transparency condition (F1)¹². We will undertake further work to explore whether we should extend the condition to include breakdowns by additional student characteristics of age and disability. If this work results in the OfS seeking to include these additional student characteristics in the breakdown of the data, we will consult on our proposals in spring 2019.
75. Ongoing condition F2 requires providers to publish and make available to the OfS details on student transfer arrangements. We will work with HESA and the ESFA to monitor the extent to which students are able to utilise credits earned at one provider when they transfer to another. This will enable us to understand the extent to which practice across the sector may not be as effective in supporting student transfers as we would like.
76. Conditions F3 and F4 include the return of data by provider to the OfS, HESA and the ESFA in order to allow us and HESA to meet our obligations under sections 64 and 65 of the Higher Education and Research Act 2017. It will be critical that the data returned by providers is both

¹² See 'Regulatory Advice 8: Guidance for providers about condition of registration F1: Transparency information' (OfS 2018.08), available at www.officeforstudents.org.uk/publications/regulatory-advice-8-guidance-for-providers-about-condition-of-registration-f1-transparency-information/.

timely and fit for purpose. Where providers return data late or the data is found to contain material error, we will consider this in our assessment of compliance with these conditions.

G. Accountability for fees and funding

Regulatory framework: Conditions G1 to G3 (OfS 2018.01 pp 132-137)

Data sources: Individualised data on higher education students; DDB and designated quality body management information; OfS systems.

77. We will use data sourced from the SLC alongside individualised data returned to HESA and the ESFA to assess any risk that a provider is in breach of condition G1. During the lifetime of this strategy we expect to begin using UCAS data and automated interrogation of providers' websites to check that providers are not advertising fees that exceed the relevant limits.
78. Condition G3 of the regulatory framework requires providers to pay registration and other fees to the OfS, and to HESA and the Quality Assurance Agency for Higher Education (QAA), the designated data and quality bodies. We will use HESA and QAA management information together with our own management information to assess whether a provider continues to satisfy this condition.

2. Validation, degree awarding powers and university title

Regulatory framework: OfS 2018.01 pp 63-81

Data sources: Individualised data on higher education students.

79. We will use individual student data to identify providers that are validating awards for students registered at other registered providers. Where students are registered with providers that are not registered with the OfS we may seek additional data on the validated provision.
80. Our approach to assessing student number and track record requirements for degree awarding power and university title applications is set out in our response to our consultation on calculating student numbers¹³. We will also make use of it to assess the extent to which degree awarding powers are being used and to ensure that subject-specific degree awarding powers are being used appropriately.

¹³ See 'Calculating student numbers: Consultation response' (OfS 2018.48), available at www.officeforstudents.org.uk/publications/calculating-student-numbers-consultation-response/.

3. Sector-level regulation

Regulatory framework: OfS 2018.01 pp 23-26

Data sources: Individualised data on higher education students; aggregate student data; student views and attitudes; student outcomes; access activities and targets; financial performance and position; staff data; costs of provision, pre-applications data; applications data; prospectus data; society, demography and the economy data (UK and elsewhere); OfS systems; management information from the DDB, designated quality body, OIA and other similar bodies; data from other government bodies, websites, social media and other big data.

81. The OfS will focus on creating the conditions for competition, continuous improvement and informed choice. To achieve this, and ensure that the higher education sector is able to diversify, innovate and flourish, the OfS will take action at the sector level. As we discharge our stewardship role, we will have our primary regulatory objectives in mind and will ensure that we are focused on positively influencing the outcomes for students from all backgrounds.
82. Our sector-level regulatory role will evolve over time, as our current work progresses and as new issues arise. As paragraphs 83 to 93 explain, we will draw on a range of approaches – sharing effective practice, funding, publishing information – depending on the outcomes we wish to achieve. In particular, we believe that publication of data and analysis can act as a powerful regulatory lever in incentivising improvement, and we will deploy this approach where it will help to achieve our aims.

Championing issues and sharing evidence and examples of effective and innovative practice

83. We will carry out research and analysis in collaboration with UCAS, HESA and other organisations to develop a comprehensive evidence base to support providers, policymakers, and others working in higher education. We are uniquely placed to link datasets to yield insight: for example, we have already linked pre-application student data, UCAS data on applications and offers, individualised HESA and Individualised Learner Record (ILR) data, and outcomes data from the Graduate Outcomes survey and LEO data. This will help us better to understand the journeys students take through education and into employment.
84. Data will also be critical in enabling providers to target and improve their outreach and participation work. The OfS's consultation on a new approach to access and participation emphasises the urgent need for a step change in performance in this area, based on evidence of effective practice and robust evaluation. We will work with the OfS-funded Evidence and Impact Exchange (to be launched in spring 2019) and with other bodies to support providers in evaluating the impact of their outreach activities. As part of this, we will support the linking data gathered through outreach work with individual pupil and student data to enhance our understanding of 'what works' in outreach.
85. We will also use data to target our funding to support outreach and participation activity in those areas where it will have the greatest impact.

Ensuring a minimum baseline of quality for all and promoting excellence and innovation beyond that baseline

86. Subject to the independent review of the TEF, we will continue to develop the current TEF indicators to ensure they are fit for purpose. We have initiated a review of benchmarking approaches which we expect to report in early 2019, and we will consider the implications of this review for the benchmarking approach used in the TEF.

Promoting student choice through diversity of providers and the provision of information

87. Students are diverse, their information needs vary, and the higher education information landscape is complex. Simply making more data available will not necessarily lead to more informed choices: our starting point must be an understanding of how students make decisions, how they use information, and how information fits within the wider information, advice and guidance setting.

88. We are currently developing our information, advice and guidance strategy¹⁴. Student-centred information – an approach which prioritises students’ own information needs and preferences – is a key element of the strategy. We also believe that the wider publication of data is important to allow informed debate about higher education. We will work with HESA to ensure that existing sources of information remain available where they add value, and to develop new publications that meet the needs of current and prospective students, providers, employers and the public more generally.

Strategic use of public grant funding for teaching and related activities

89. The OfS teaching grant supports a range of activities and provision across those providers registered in the ‘Approved (fee cap)’ category. Most of this funding is distributed formulaically using data sourced from providers and elsewhere. In developing our funding methods our aim is to reduce the data burden on providers. In particular, we plan to remove the need for providers to make aggregate student returns for funding purposes.

4. Intelligent regulation: understanding students, the sector and our effectiveness

90. To support our regulatory responsibilities, we need to understand the sector we regulate and this will require us to undertake research and evaluation activities in certain areas. This will enable us to identify and respond to the challenges and opportunities students and the sector face, both now and in the future.

91. To this end, we are planning a programme of research and evaluation activity. Our 2018-19 business plan includes:

- developing intersectional measures of disadvantage
- understanding student decision making so that we can ensure effective use of data and evidence to inform it

¹⁴ See www.officeforstudents.org.uk/advice-and-guidance/student-information-and-data/next-steps-for-information-advice-and-guidance/.

- understanding patterns of progression
- analysing patterns and trends in sector financial health and sustainability.

92. We will collect this data and information in a variety of ways, for example through short-term, targeted data collections, polling, and surveys such as the proposed sample survey of postgraduate taught students. We will also take account of our research and evaluation work when specifying detailed data requirements. For example, while we may not routinely refer to detailed student disability data in assessing provider compliance with ongoing registration conditions, it will help us to understand the experience and outcomes of students with particular disabilities such as mental health, and to respond accordingly. For the most part, however, we will make use of data that we or others already gather, in line with our commitment to reducing regulatory burden as far as possible.

93. We will also use the data we hold to judge our own effectiveness, and the effectiveness of our interventions. We are developing a range of key performance measures¹⁵ which we will use to measure our success and the level of burden we place on the sector. In line with our overall approach to transparency we have already published some of the indicators we are using to measure ourselves, and will set challenging targets for them.

¹⁵ See www.officeforstudents.org.uk/about/measures-of-our-success.

List of abbreviations

DDB	Designated data body
DfE	Department for Education
ESFA	Education and Skills Funding Agency
HEAPES	Higher Education in Alternative Providers Early Statistics survey
HESES	Higher Education Students Early Statistics survey
HESA	Higher Education Statistics Agency
ILR	Individualised Learner Record
LEO	Longitudinal Education Outcomes
NSS	National Student Survey
OfS	Office for Students
OIA	Office of the Independent Adjudicator
QAA	Quality Assurance Agency for Higher Education
SLC	Student Loans Company
TEF	Teaching Excellence and Student Outcomes Framework
TRAC	Transparent Approach to Costing
TRAC(T)	Transparent Approach to Costing for Teaching
UKRI	UK Research and Innovation

Annex A: Data sources

1. This annex lists the quantitative data the Office for Students (OfS) will routinely require from or about providers from 1 August 2019. (Our data requirements for 2018-19 were confirmed in Regulatory Notices 2 and 3¹⁶.) Our requirements will vary depending on the regulatory status of the provider and the provision it offers. Some data, in particular on offshore provision, is new and will be subject to further consultation.
2. The OfS may require additional information from an individual provider where we consider there is an increased risk of a breach of one or more ongoing conditions of registration. We may also need to collect additional data to support activities such as thematic reviews, the development of future data returns, and Teaching Excellence and Student Outcomes Framework development.
3. We expect also to make use of a wide range of other data and information, including:
 - data on society, demography and the economy, both in the UK and elsewhere.
 - data derived from OfS internal systems
 - management information from the Higher Education Statistics Agency (HESA), the Quality Assurance Agency for Higher Education, the Office of the Independent Adjudicator and similar bodies
 - data from other government bodies
 - websites, social media and other big data.

¹⁶ See 'Regulatory Notice 2: Regulation up to 31 July 2019 of providers that were previously funded by HEFCE' (OfS 2018.12), available at www.officeforstudents.org.uk/publications/regulatory-notice-2-regulation-up-to-31-july-2019-of-providers-that-were-previously-funded-by-hefce/, and 'Regulatory Notice 3: Regulation up to 31 July 2019 of providers currently designated for student support by the Secretary of State' (OfS 2018.13), available at www.officeforstudents.org.uk/publications/regulatory-notice-3-regulation-up-to-31-july-2019-of-providers-currently-designated-for-student-support-by-the-secretary-of-state/.

Table 1: Educational data sources

Data	Sources	Key features	Uses (see Table 2)
Individualised data on higher education students	HESA student records Education and Skills Funding Agency Individualised Learner Records (ILR) Student Loans Company	All students registered with or studying for awards of registered providers including transnational education Student demographics Course and study details Study outcomes	A, B, D, E, F, G, Powers, Sector
Aggregate student data	Higher Education Students Early Statistics survey [†] Higher Education in Further Education Students survey [†] Medical and dental students survey [†] Student forecasts	Aggregate student data, including forecasts, broken down by the categories needed to support our funding allocations.	Sector
Student views and attitudes*	National Student Survey, including intentions after graduation Postgraduate Student Survey	Student views on provision and providers linked to individual student records wherever possible	B, F, Sector
Student outcomes	Longitudinal Educational Outcomes Graduate Outcomes survey	Employment Earnings Further study Satisfaction and impact of higher education	A, B, F, Sector
Access activities and targets	Access and participation plans	Income and expenditure Activities Targets and priorities Evaluation	A, Sector
Financial performance and position	HESA finance records Financial forecasts	Current and planned financial performance	D, Sector

Data	Sources	Key features	Uses (see Table 2)
Staff data	HESA individual staff record	Academic and related staff Staff demographics Contract details and salary	Sector
Costs of provision	Transparent Approach to Costing (TRAC) Transparent Approach to Costing (Teaching)(TRAC(T))	Details of costs of teaching and research.	D, Sector
Prevent submissions	Prevent outcomes return	Staff training, welfare concerns, and external speakers and events explanatory supportive information	Prevent
Accountability returns	Annual accountability return	Audited accounts Audit reports	E
Applications data	Transparency condition data UCAS data	Data on the patterns of applications, offers and acceptances	A, B, D, F, Sector
Pre-application data	National pupil database	Details of students' backgrounds Pre-higher education qualifications	A, B, Sector
Prospectus data	Unistats	Details of courses to support information, advice and guidance	F, Sector

Notes

* As we develop our approach to topics such as value for money we may need to conduct one-off surveys. In the long term, we will consolidate our survey activity in order to minimise burden on students.

† These surveys are required to support the funding method inherited from HEFCE. In developing the OfS's funding approach we will aim to remove the requirement for these returns.

Table 2: Explanation of 'Uses' in Table 1

Abbreviation	Use
A	Access and participation for students from all backgrounds
B	Quality, reliable standards and positive outcomes for all students
C	Protecting the interests of all students
D	Financial viability and sustainability
E	Good governance
F	Information for students
G	Accountability for fees and funding
Powers	Validation, degree awarding powers and university title
Sector	Sector-level regulation
Prevent	Monitoring the Prevent duty



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