

Priorities for the Office for Students data strategy

The UK has a world-leading higher education system and the Office for Students (OfS) has a key role to play in its future success for the benefit of students, communities and all UK citizens. The use of information, including data and qualitative intelligence, will underpin how the OfS undertakes all of its regulatory functions. Creating a data strategy which delivers on the risk-based and proportionate approach to monitoring and regulation set out in the regulatory framework will therefore be critically important to the success of the new regulator.

With this in mind, our priorities for the OfS in developing a data strategy are to:

1) **Maintain oversight of the sustainability and health of UK higher education**

In order to ensure students can continue to benefit from a high-quality education and a rewarding experience under the new regulatory environment, the UK must maintain a sustainable and globally competitive higher education sector with excellent staff, world-class research, links to businesses and local communities, and international partnerships.

We therefore welcome the intention for the OfS to undertake a foresight function. This should seek to identify and understand how future challenges and uncertainty on a range of issues, including Brexit, increasing global and domestic competition, the changing policy agenda, and the outcome of the USS reform proposals, may impact on the health and sustainability of the sector.

A whole-system approach is needed, recognising the broader purpose that universities serve alongside the provision of teaching and learning, undertaking cutting-edge research, supporting innovation with business and promoting prosperity through leadership in their local and regional communities.

Providers should have a role in informing and directing foresight activity based on their experience and the academic expertise within their institutions. We would welcome the opportunity for a range of universities and academic experts to participate on the horizon scanning panel which the regulator is convening. The OfS should also ensure its work does not duplicate that of established research groups but rather draws on existing evidence.

2) **Focus on the quality as well as the quantity/timeliness of data**

Any data used for regulatory purposes should be clearly sourced, robust and validated, with institutions provided with advance notice and an opportunity to verify and, where appropriate, challenge the data. Academic experts should also be involved in formulating technical and statistical approaches.

There is a trade-off between immediacy and quality as data needs to be verified, and numbers will change through academic cycles. Taking frequent snapshots of data on student recruitment throughout the year, for example, is of limited value for foresight purposes given most programmes operate on an annual cycle. There is a risk that such data could be misinterpreted, and the OfS should therefore prioritise seeking data that is fit for purpose over and above the immediacy of data provision.

Providers are actively engaging in the development and implementation of the Data Futures programme which aims to modernise and streamline the landscape of data in higher education. It will be important to recognise, however, that data quality will reduce during transition to the new systems being introduced as part of the programme. The resulting

In addition, the regulator should seek to limit the regularity of changes in reporting requirements and always provide sufficient lead-time for providers to respond to new requests.

5) **Take a risk-based approach, delivering a reduction in reporting burden for providers and ensuring value for students**

Reducing regulatory burden for providers will mean more resource is available for other activities from which students will directly benefit and this should be a core priority for the regulator and the designated data body. The expectation that reporting be “in as near real time as possible” is likely to place considerable demands on institutions, and risks

Data collected directly by OfS/HESA from students or graduates