

HEFCE CONSULTATION

Public information about higher education

Consultation on changes to information published by institutions

Responses should be made online by Monday 7 March 2011

Consultation document available at:

http://www.hefce.ac.uk/pubs/hefce/2010/10_31/

Submission by British Sociological Association and Council of Heads and Professors of Sociology HaPS

Consultation questions

Responses should be made online by **Monday 7 March 2011** using the response form that can be accessed alongside this document at www.hefce.ac.uk under Publications.

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?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

Please add any comments:

We believe that the principles b and c hold and that existing instruments, such as the NSS, are adequate to these purposes. However, we believe that principle a, however desirable in principle (as well as being implicit in the introduction of a market in higher education) is very difficult to achieve. We believe that existing studies show that the NSS cannot be used to make comparisons across institutions, including across subjects. The main reason is that the numbers enrolled in particular programmes of study is insufficient to provide reliable information. Paradoxically, the NSS shows that most institutions and subjects are highly clustered with little differentiation among them. The conversion of a highly clustered data set based on small sample sizes into a rank order would be statistically unreliable and would produce invalid results (and hence would be tantamount to mis-selling). We also believe that such usage has de-legitimated the NSS and undermined confidence in its other purposes. These arguments are set out in John Holmwood 'Code of Practice needed to prevent degree course mis-selling' http://exquisitelife.researchresearch.com/exquisite_life/2011/02/code-of-practice-needed-to-halt-degree-course-mis-selling-.html#more , drawing upon a report to HEFCE and recent article by Cheng and Marsh 2010 (both cited in Holmwood).

We believe that similar problems would arise with the construction of equivalent information on incomes for graduates from different courses and universities (and are compounded by poorer response rates), as indicated in the recent Report to HEFCE, 'Approaches to measuring employment circumstances of recent graduates' http://www.hefce.ac.uk/pubs/hefce/2011/11_02/. The problems with income data are compounded by the fact that it is intended to measure income at 6 months after graduation. There is some research to indicate that employers may use the 'brand reputation' (however derived) of the university attended as an initial screening device in recruitment. However, differences in returns to university attended reduce over time as employers differentiate staff, once recruited, in terms of their performance on the job. See, Lang and Siniver (2010) 'Why is an elite undergraduate education valuable? Evidence from Israel' Unpublished working paper, available via links at: <http://sns.ly/7vbuy9>

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?

~~Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree~~

Please add any comments:

Although we accept that prospective students would find information that enables comparison among universities, we do not believe that such information can be produced reliably for the reasons set out in the previous response.

We do believe that any information should be provided in a single place alongside other course information. We are concerned that HEFCE plans to allow institutions to supplement this with contextual information. Since the latter is likely to include reference to spurious and misleading rank orders, we believe that HEFCE should also require Universities to sign up to a Code of Practice concerning the use of information in a way that makes comparisons with other institutions.

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

~~Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree~~

Please add any comments:

Yes, together with a statement about the limitations of the use of the material and whether the institution has signed up to abide by a Code of Practice regarding the interpretations (and their use) that the data will bear.

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?

Please add any comments:

We believe that the proposal to collect income data six months from graduation is fraught with problems and it has very limited utility, given that the small Ns of the NSS are likely to be replicated with a more serious problem in the response rate. As also argued, we believe that income at 6 months is not necessarily a good predictor of future income.

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?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

Please add any comments:

We believe that there is unlikely to be robust data, except by a degree of aggregation that makes the information likely not to be commensurable across different categories. We also believe that 'up to date' employability statements have little meaning since they will be produced approximately four years prior to a student's own graduation into employment.

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.

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

Please add any comments:

Subject to the qualification about employability statements, given above, we do not object to the information being provided. However, as also indicated above, we believe that institutions should be restricted in terms of the interpretations they can offer about the information provided. We are concerned that HEFCE is aware of the limitations of making comparisons using NSS data (which we believe other studies to show are even more severe than revealed in the Report to HEFCE on the Enhancement of the NSS. We believe that a Code of Practice should be developed in conjunction with Universities UK regarding the use of such data and that the details of the code and its disclaimers should also be published prominently on websites.

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?

Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

Please add any comments:

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?

~~Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree~~

Please add any comments:

Yes, although we note that this would only serve the purposes b and c of the three identified in paragraph 42. It would, therefore, seem to be a matter for internal communication, rather than for external publication.

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

Please add any comments:

As indicated, we propose that a Code of Practice on the proper use of information be agreed with institutions via Universities UK and with the possible involvement of the National Statistics Authority.