

## Data strategy

### Issue

1. This paper gives:
  - a. An overview of the OfS data strategy, including our vision, and
  - b. The process of consultation and timetable for publication

### Recommendations

2. The board is invited to:
  - a. Endorse the vision statement
  - b. Agree the definition of data
  - c. Agree the broad principles that will form the basis of the strategy

### Further information

3. Available from Richard Puttock, head of data, foresight and analysis (0117 931 7472 or 07795 257344, [richard.puttock@officeforstudents.org.uk](mailto:richard.puttock@officeforstudents.org.uk)).

## Background

4. The consultation on the regulatory framework committed OfS to publishing a data strategy during 2018, this commitment was confirmed in the regulatory framework. This document is important as it will not only set out the OfS' broad approach to data but is a necessary to allow the OfS to define its detailed data requirements for 2019-20.

## The OfS's general duties

5. HERA sets out the OfS information duties in sections 64 and 65, in addition most other functions of the OfS will be underpinned by data.
6. Paragraph 28 of the regulatory framework gives our broad approach to data, the data strategy will expand on this significantly. Registration conditions F3 and F4 compel providers to return information and data to the OfS and designated data body.

## Discussion

7. OfS has set out to establish itself as an intelligent data led regulator that will use data to deliver its regulatory objectives in a low burden way. The data strategy is intended to complement the OfS' main strategy.
8. The OfS' proposed vision for data is:

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

Recommendation: The board is invited to endorse the vision

9. The core message of the vision is that we believe that we can be more effective and less burdensome through good use of data. This is not intended to act as a carte blanche for collecting more data but recognises that an increased data burden could reduce burden elsewhere leading to a net reduction.
10. Our vision will support students by ensuring that our regulation is both effective, thereby protecting them and efficient meaning that providers have more resources to spend on students. We and the designated data body will publish data to support student choice and increase public understanding of higher education.
11. In defining our data strategy it is necessary to define what we mean by data. We propose to interpret data in the broadest possible sense. When we talk about data we include:
  - a. Structured data returns made by individual providers
  - b. Administrative data collated by other bodies such as the SLC and UCAS
  - c. Qualitative and textual data such as that collected through surveys of students and stakeholders
  - d. Unstructured and big data from sources such as social media and web analytics

Recommendation: The board is invited to agree the definition of data

12. We plan to structure the data strategy around five core areas:

- a. Ethical behaviours and compliance
- b. Minimising burden and working with others
- c. Transparency
- d. Our approach to analysis
- e. Quality

13. The main behaviours that we will set out under each heading are given below.

### **Ethical behaviour and compliance**

14. We will be clear that we view data as a valuable asset. Most of the data we will process will relate to individual students we will treat it with care ensuring that students rights and interests are protected in all we do. Our use of data should never go beyond those that students might reasonably expect from a responsible regulator acting in their interests.

15. We will assert our commitment to adhering to the code of practice for official statistics and signal our intention to minimise pre-release access to data, including not routinely granting pre-release to data to providers.

### **Minimising burden and working with others**

16. We intend to work with others, and in particular HESA as the designated data body, to ensure that the data that are collected under our powers can meet the needs of other public bodies as well as providers themselves.

17. We will only ask for the data we require to fulfil our functions and where possible will obtain data from others such as UCAS and the SLC to further reduce burden.

18. We will minimise the data that we require of providers, ensuring that every data item we request has a clear purpose and that this is clear to providers.

### **Transparency**

19. Transparency is part of the regulators code. Our default position will be that we are transparent in our use of data. We will tell providers, and others, how we are using data and give providers tools to allow them to understand how the metrics we are judging them on are constructed. There are risks in the levels of transparency that we are proposing but we believe that these can be mitigated and the benefits far outweigh them.

### **Our approach to analysis**

20. We will set out our approach to analysis which will be underpinned by rigour and will recognise the diversity of the sector. We view benchmarking as a valuable tool in understanding provider performance.

21. We will stress the importance of data linking and combining both quantitative and qualitative data to gain deep understandings of the issues in the sector and the wider

environment in which it operates. There will be a commitment to using up-to-date techniques to ensure that we are gaining the most insight possible from the data we hold.

## Quality

22. Conditions F3 and F4 make it clear that data quality is the responsibility of providers. We will commit to providing tools to support providers in returning high quality data. Data audit will be an essential tool in assuring ourselves of data quality, our preference will be to be risk based in who we select to audit but we will sometimes need to be less focussed so as to understand the overall risk to data quality.

Recommendation: The board is invited to agree the broad principles that will form the basis of the strategy.

## Timetable for publication

23. We have previously committed to publishing our strategy this year. However, we are coming under increasing pressure to finalise our data requirements for the 2019-20 academic year which requires us to have set out our strategy. We therefore intend to engage in further consultation with key stakeholders over the remainder of the summer prior to publication in the week commencing the 24 September 2018.
24. Alongside publication of the strategy we will publish a document that sets out the data returns that we will require from all registered providers in the 2019-20 academic year. While the document will set out the returns and their coverage it will not give details of the individual data items which will be subject to further consultation as set out in s64 of HERA. We expect to finalise the detail of the returns during the remainder of 2018.

## Resource implications

25. The detailed work to develop the strategy and engage with stakeholders is within the data, foresight and analysis directorate. Further resource will be required from the external relations directorate to support publication of the strategy.
26. Implementation of the strategy is already largely embedded in the work of the data, foresight and analysis directorate. Fully delivering the strategy will require staff within the directorate to re-skill and upskill to deal with unstructured data sourced from the web and to secure data from third parties.

## Risk implications

27. Failure to define and implement an ambitious data strategy carries a number of strategic risks for the OfS. If we fail to use data effectively and intelligently we will not be able to deliver effective regulation that supports our objectives. These risks could materialise through failure to highlight the risks of individual provider failure or systemic issues affecting our core objectives. In addition failure to use data effectively is likely to lead to more burdensome regulatory interventions.

## **Communications and engagement**

28. It is not proposed that we engage in formal consultation over the data strategy. Staff from the data, foresight and analysis directorate have already begun a series of informal one-to-one discussions with key stakeholders including DfE and HESA. Initial reactions to the broad messages in the strategy have been positive.
29. It is proposed that further discussions and sharing of a draft strategy will continue over the summer in order to ensure that key stakeholders, and especially those on who we will rely to deliver our vision, are supportive of the strategy.

## **Paper publication date**

30. The paper can be published immediately.