Responses to the "Invitation to comment" UKPISG 14/02

Issue

- 1. In December 2013, through a letter to the heads of higher education providers, the four funding bodies invited comment on future changes to the UK Performance Indicators (UKPIs)¹. In the letter, respondents were invited to comment on some preliminary actions proposed by the UK Performance Indicators Steering Group (UKPISG) in its initial response to the findings of a fundamental review² of the UKPIs.
- 2. Members are invited to consider the summary of responses to the "Invitation to comment" and to consider next steps.

Recommendations

- 3. That members consider whether any changes are required to the proposed guiding principles.
- 4. That members formally accept the guiding principles for UKPIs.
- 5. That members agree whether Table R1 should be discontinued, and if so, timing and approach to that discontinuation.
- 6. That members consider what further actions are required with regard to research UKPIs.
- 7. That members consider further actions relating to additional issues emerging from the responses to the "Invitation to comment".

Discussion

- 8. In December 2013, through a letter to the heads of higher education providers, the four funding bodies invited comment on future changes to the UK Performance Indicators (UKPIs)³. In the letter, respondents were invited to comment on some preliminary actions proposed by the UK Performance Indicators Steering Group (UKPISG) in its initial response to the findings of a fundamental review⁴ of the UKPIs.
- 9. Recommendation 4 of the fundamental review, as accepted by UKPISG, stated that:

¹ http://www.hefce.ac.uk/pubs/year/2013/cl332013/#d.en.85233

² "How should we measure higher education? A fundamental review of the Performance Indicators" http://www.hefce.ac.uk/pubs/rereports/year/2013/ukpireview/#d.en.85232

³ http://www.hefce.ac.uk/pubs/year/2013/cl332013/#d.en.85233

⁴ "How should we measure higher education? A fundamental review of the Performance Indicators" http://www.hefce.ac.uk/pubs/rereports/year/2013/ukpireview/#d.en.85232

- 'The key features of the current UKPI approach should be retained. A set of guiding principles should be developed (building on those from a 2006 review of the UKPIs) and used by the UKPISG to judge the appropriateness both of making changes to the existing UKPIs and of introducing any new UKPIs suggested for the future.'
- 10. Building on suggestions made by the fundamental review, UKPISG proposed the set of guiding principles listed in Annex B of the letter of invitation. Comments were welcomed on the proposed guiding principles.
- 11. Recommendation 5, as accepted by UKPISG, stated that:
 - 'The current set of UKPIs should undergo a more detailed review to ensure they use the most appropriate data and have the appropriate focus to measure the specified topics, including the scope of the population covered.'
- 12. Feedback from the review process and from HESA led the UKPISG to understand that the current research output UKPIs suffer from poor usage and a widespread lack of understanding. The current set of UKPIs includes four indicators of annual research output (see <u>Table R1 of the UKPIs</u> on the HESA website. These indicators look at numbers of PhDs awarded and amount of research grants and contracts obtained, relative to the academic staff costs of an institution and funding council allocation of quality related (QR) research funds to that institution.
- 13. As the first stage of its response to Recommendation 5, the steering group wanted to consider the discontinuation of the existing measures and welcomed views from institutions as to their support or otherwise for this proposal and what might follow from it.
- 14. 58 responses were received to the invitation to comment; the total numbers of respondents by type are set out in Table 1. The majority of responses from institutions came from their planning offices/departments.

Table 1 Numbers of respondents by type

Respondent type	Number of responses
English Higher Education Institution (HEI)	39
Scottish HEI	9
Welsh HEI	5
Further Education College (FEC)	2
Representative bodies	3

Summary of responses

Comments relating to the principles

- 15. Respondents were invited to comment on the guiding principles given in Annex B of the invitation to comment letter (attached as Appendix 1` of this paper). The principles were grouped into five areas: Coverage and scope (A); Quality of data (B); Dissemination (C); Benchmarking and enhancement (D); Burden of data collection (E); and Influence on behaviour (F).
- 16. All respondents who made comments about the principles as a whole welcomed, supported or agreed with the principles proposed.
- 17. Respondents provided comments on particular principles and the majority of these comments were to indicate additional support for, or to provide their understanding of, the particular principle. Principles that were particularly welcomed were:
 - A1 "UKPIs should normally seek to reflect the totality of HE provision and institutions across the UK". A number of respondents welcomed that UKPIs should be covering not only HE provided at higher education institutions but also at further education colleges and alternative providers.
 - A3 "UKPIs should, as standard, provide an aggregate picture of UK HE and allow institutions to compare themselves to other institutions in the different nations across the UK. In addition there may be a requirement for a small number of nation-specific indicators". A number of Scottish respondents particularly welcomed the option of having a small number of nation-specific indicators.
 - B1 "UKPIs should be produced by a credible and independent organisation". A number of respondents were keen to express their support for the current producer: the Higher Education Statistics Agency (HESA). Some went further and said "...the UKPIS must be statistically robust and conform to recognised best practice in the production of statistical information. We believe that HESA is the only organisation who could ensure this. HESA possesses both extensive experience of the collection and collation of UK HE data and also the trust of the sector."
 - A number of respondents welcomed the principles on dissemination (C) and expressed a
 desire for more to be done to help users improve their understanding of the context in
 which the UKPIs are set, and their interpretation particularly with regard to benchmarks.
 In addition, respondents identified benchmarks as a strength and key feature of the
 UKPIs (D).
 - A significant number of respondents welcomed the principle relating to burden of data collection (E). The majority reinforced the need for the UKPIs (both existing and new indicators) not to place undue burden on the sector.

Concerns

18. A number of respondents indicated some concerns relating to the interactions between principles and the potential contradictions these may cause. These mainly centred on interaction

between Principle A4 "Taken together, the UKPIs and their associated benchmark values should provide information in the public domain that is not otherwise easily available", Principle C1 "The UKPIs and their associated benchmark values should be free and available to all", and Principle D3 "UKPIs and their associated benchmarks should not be presented in such a way as to imply any institutional ranking". For example, one respondent was concerned that "there is nothing to stop them being used for ranking purposes by external bodies", and another that "due consideration must be given to how data might be used and interpreted by external bodies".

- 19. In addition, respondents had concerns or suggested enhancements on particular principles:
 - C2 One respondent suggested the addition of "... and in exceptional situations (where data is demonstrably incorrect) to temporarily suspend the listing of a PI for an institution."
 - D2 "There should be an expectation that institutions will take note of their indicators and benchmarks ...". A few respondents noted those applying this principle should respect institutional autonomy and be clear that institutions made the ultimate decision on the inherent value of the indicators and their signalling to performance.
 - E1 One respondent suggested the removal of "Where possible" from E1. This was in line with the comments of a number of respondents.
- 20. Respondents also commented that some features of the existing indicators would not meet the proposed principles:
 - A number of respondents highlighted the complexity of the methodology used in some of the indicators and thus how Principle B2 "UKPIs ... should use a transparent methodology" may not being met in some instances. Some respondents accepted that a complex methodology was necessary and better explanations were needed, whilst others endorsed a simpler approach for some indicators: the benchmarking methodology and Table 5 on projected completions were highlighted as particularly difficult to follow.
 - The quality of the data used in some of the indicators was questioned (Principle B2). A
 few respondents express concern regarding the quality of the Social Economic
 Classification used in the Widening Participation indicators, and one respondent
 expressed concern about the broad nature of the independent/state school classification.
 A number of Scottish institutions expressed concern over the use of POLAR in a Scottish
 context.
- 21. With regard to future development of UKPIs, one respondent suggested that any further departures from the principles should be identified by the UKPISG and highlighted to a wider audience.

Recommendation: That members consider whether any changes are required to the proposed guiding principles.

Recommendation: That members formally accept the guiding principles for UKPIs.

Responses relating to the research indicators

- 22. Institutions were also invited to respond to the following questions with regard to Table R1:
 - a. Would you support the proposed discontinuation of the research output UKPIs (Table R1)?
 - b. Alternatively, is a replacement research-related UKPI desirable?
 - c. If a replacement UKPI is desirable, would your preference be to phase out the existing Table R1 measures only when new measures are available? Or would you support the discontinuation of Table R1 at the earliest opportunity, with new measures to follow in due course? (Bear in mind that this would most likely necessitate a period of time in which no UKPIs were published in relation to research activities.)
- 23. We would wish to steer the UKPISG to consider the quality of the arguments advanced rather than a simple numerical account. However, it is relevant to group responses as in Table 2 to understand the composition of respondents and the distribution of response types.
- 24. Responses to the questions listed in paragraph 22 fell into one of six broad types:
 - a. Retain the current Table R1 without development of new supplementary indicators;
 - b. Retain the current Table R1 with development of new supplementary indicators;
 - c. Development of new alternative indicators with Table R1 being phased out as the new indicators are being phased in;
 - d. Development of new alternative indicators with removal of Table R1 as soon as possible (i.e. new alternative indicators would not necessarily have to be in place);
 - e. Removal of Table R1 with no replacement;
 - f. No response to these questions.

Table 2 Distribution of responses to research questions

	English	Scottish	Welsh	Represent.		
Response type	HEI	HEI	HEI	body	FEC	Total
Retain R1 without new indicators	2	1	1			4
Retain R1 with new indicators	6					6
Phasing out R1 with new indicators						
phasing in	11		1	1		13
Immediate removal of R1 with new						
indicators to be developed	9	2	1			12
Immediate removal of R1 with no						
replacement	8	5	2	2		17
No response	3	1			2	6
Total	39	9	5	3	2	58

- 25. Table 2 shows that the majority of those who responded supported the removal of R1 but there was not a consistent view on the timing for the removal of the table and if it should be replaced. Ten respondents indicated that Table R1 should be retained in its current form.
- 26. Of the respondents who indicated the need for the development of new indicators (the greyed rows of the table), the majority did not suggest what form the new indicators should take. Of those who did, the following areas/indicators were suggested: postgraduate research completion, retention, qualification or success rates; non-defined innovation measures; Research Excellence Framework (REF) / Research Assessment Exercise (RAE) derived statistics; Snowball metrics⁵; research grants/income or postgraduate research students per academic full-time equivalent; research grants applied for; research income secured; and impact of research on wider society. These suggestions were normally only mentioned by one (or sometimes two) respondents.
- 27. The HEFCE Research Policy team hold the view that R1 should be retained and that alternative measures to be phased in over time should be investigated. It was noted that it could send a strange signal to have a set of indicators that sought to measure the performance of the sector but didn't have any mention of research performance. Colleagues acknowledged that REF could provide a measure, but that, as the invitation to comment points out, the timing wouldn't be particularly compatible with an annual set of indicators.
- 28. Respondents were also asked about other existing measures: Would you consider that other existing measures (such as the Research Excellence Framework, performed every 6 to 7 years) are adequate for your purposes with respect to institution-level information on research activities?
- 29. Around a half of those that responded to this question indicated that the other existing measures were adequate for their purposes, with a significant number indicating that they used RAE/REF and HEIDI derived measures in combination.

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⁵ http://www.snowballmetrics.com/

30. Of those that indicated that the existing measures were not adequate, the majority cited the infrequency of REF/RAE as the main issue and the need for annually reported statistics. A few respondents also indicated that the focus on only the very highest research was also an issue when using RAE/REF derived statistics.

Recommendation: That members agree whether Table R1 should be discontinued, and if so, timing and approach to that discontinuation.

Recommendation: That members consider what further actions are required with regard to research UKPIs.

Comments relating to the recommendations

- 31. Although the invitation to comment did not invite comment on the recommendations that the UKPISG accepted in September 2013, a number of respondents provided feedback on this. Of those respondents who did provide feedback on the recommendations as a whole, all were supportive of them.
- 32. The greatest number of concerns raised related to Recommendation 6 "Within the context of recommendations 2 and 3 above, the feasibility of broadening the coverage of UKPIs into five new areas (mostly beyond teaching and learning) should be explored: i) value added, ii) financial sustainability, iii) teaching quality, iv) international outlook and v) employer and business engagement." Respondents had concerns relating to all five areas suggested but there were two main themes from respondents: the appropriateness of value-added indicators in the higher education sector and how they might be defined; and the overlaps with other work being carried out with regard to financial sustainability and teaching quality indicators.
- 33. In addition, the majority of responders highlighted the need for early and strong engagement with the HE sector on the development of any new indicators (or areas that they would cover).
- 34. A number of respondents also provided comment on Recommendation 7 "Specific individual institution-level operational indicators that move beyond UK-wide sector level priorities should be developed as necessary through other means, such as the improved functionality of the Higher Education Information Database for Institutions (HEIDI), rather than as separate UKPIs. HEIDI is available to all full subscribers to the Higher Education Statistics Agency" drew comments from a number of respondents. All were highly supportive of HEIDI and identified the need to further enhance HEIDI. The importance of HEIDI to support the sector was also highlighted in the responses to the questions relating to Table R1 (see above) where a number of respondents identified its usefulness in benchmarking research performance.

Recommendation: That members consider further actions relating to additional issues emerging from the responses to the "Invitation to comment".

Further information

1. For further information contact Mark Gittoes (Phone: 0117 931 7052; e-mail: m.gittoes@hefce.ac.uk) or Alison Brunt (Phone: 0117 931 7166; e-mail: a.brunt@hefce.ac.uk)

Appendix 1: Invitation to comment letter

Higher Education Funding Council for England

Title Invitation to comment on future changes to the UK Performance

Indicators

To Heads of HEFCE-funded higher education institutions

Heads of HEFCE-funded further education colleges

Heads of other providers of higher education in England

Of interest to those Higher education, Increasing and widening participation, Student

responsible for experience and destinations, Research management

Reference Circular letter **33**/2013

Publication date 9 December 2013

Enquiries to <u>ukpisg@hefce.ac.uk</u>

Dear Vice-Chancellor or Principal

Invitation to comment on future changes to the UK Performance Indicators

Purpose

- 35. The UK Performance Indicators Steering Group (UKPISG) is considering a number of changes in relation to the UK Performance Indicators (UKPIs). The UKPIs are currently published by the Higher Education Statistics Agency (HESA) on behalf of the four UK higher education (HE) funding bodies.
- 36. The possible changes outlined in this letter arise from the findings of the 'Fundamental review of the UK Performance Indicators', which has been published today. The fundamental review finds that UKPIs are valued as a way to measure HE provision, and that the current approach to UKPIs is appropriate. However it also determines that:
 - the current set of UKPIs requires some refinement
 - there is scope to introduce a small number of additional UKPIs to take account of the wider role of HE
 - there is a desire to broaden the populations and institutions covered by UKPIs to take account of the changing make-up of HE provision and of the HE sector.
- 37. This letter invites your comments on some preliminary actions proposed by UKPISG in its initial response to the findings of the fundamental review of the UKPIs. An opportunity to comment is being provided to institutions before these changes are discussed further, formally amended if appropriate, accepted and then implemented by UKPISG during 2014.

38. All UK providers of HE are being asked by their relevant higher education funding body to submit any feedback that they may have about these proposals to the UKPISG secretariat at ukpisg@hefce.ac.uk. Feedback should be submitted before **noon on Friday 24 January 2014**.

Background to this letter

- 39. The first set of UKPIs was published in 1999, having been developed out of recommendations of the National Committee of Inquiry into Higher Education (the Dearing Report) to provide suitable indicators and associated benchmarks of the performance of the HE sector. The development of the UKPIs over time has been governed by UKPISG. This collaborative governance arrangement continues to bring together representatives of the four UK funding bodies for HE, HESA, government departments, HE institutions and other interested bodies to steer the development of these measures.
- 40. A fundamental review of the UKPIs was commissioned by UKPISG in early 2013, in the context of large-scale, fast-paced changes in the HE sector, and differing policies for HE between the UK nations. The overarching aim of the research was to review the rationale, purpose and policy drivers of the UKPIs, the usage and the users of the UKPIs; and whether the existing UKPIs were still fit for purpose. The review engaged with a wide range of interested bodies and organisations, and several of you will have participated.
- 41. The review made a number of recommendations to UKPISG, which were considered at the September 2013 meeting. UKPISG has accepted and will implement over time a series of recommendations as listed at Annex A (which can be found alongside this circular letter). Among the recommendations is a commitment to UKPISG engaging in dialogue with the sector as change is taken forward. It is considered that full implementation will take time and need to proceed in stages. UKPISG is therefore asking at this stage for your comments on a revised set of principles for the UKPIs, and for your broad views about the research-related indicators. We envisage further engagement as other areas of possible change are addressed.
- 42. Other indicators within the current set of UKPIs will be subject to an in-depth rolling review process which will commence in due course. This will include reviewing the current indicators relating to:
 - widening participation of under-represented groups and of students in receipt of Disabled Student's Allowance (DSA)
 - non-continuation rates, including projected outcomes
 - employment of leavers.
- 43. Also among the recommendations accepted by UKPISG is a commitment to exploring the feasibility of broadening the UKPIs into new areas beyond those covered by the current set. UKPISG recognises that it has neither the time nor the resource available to undertake this exploratory work in parallel with conducting in-depth reviews of the current UKPIs. It also notes that on-going work in the sector may help it better understand the issues and existing measures in some of these potential new areas before taking any decisions. At this time, UKPISG considers that introduction of UKPIs in new areas is a lower priority than ensuring that the existing indicators are fit for purpose. It anticipates commencing exploratory work relating to new areas once the in-depth reviews of the existing UKPIs have been completed.

Guiding principles for UKPIs

- 44. Recommendation 4, as accepted by UKPISG, states that:
 - 'The key features of the current UKPI approach should be retained. A set of guiding principles should be developed (building on those from a 2006 review of the UKPIs) and used by the UKPISG to judge the appropriateness both of making changes to the existing UKPIs and of introducing any new UKPIs suggested for the future.'
- 45. Building on suggestions made by the fundamental review, UKPISG proposes the set of guiding principles listed at Annex B (which can be found alongside this circular letter). It is anticipated that these principles will be used by UKPISG to guide its governance of the UKPIs, and will become central to the future development of the UKPIs. The intended use and application of the principles is described further at Annex B.
- 46. We would welcome your comment on the proposed guiding principles.

Future of the Research Output UKPIs

- 47. Recommendation 5, as accepted by UKPISG, states that:
 - 'The current set of UKPIs should undergo a more detailed review to ensure they use the most appropriate data and have the appropriate focus to measure the specified topics, including the scope of the population covered.'
- 48. Feedback from the review process and from HESA have led the UKPISG to understand that the current research output UKPIs suffer from poor usage and a widespread lack of understanding. The current set of UKPIs includes four indicators of annual research output (Table R1). These indicators look at numbers of PhDs awarded and amount of research grants and contracts obtained, relative to the academic staff costs of an institution and funding council allocation of quality related (QR) research funds to that institution.
- 49. As the first stage of its response to Recommendation 5, the steering group is considering the discontinuation of the existing measures and would welcome views from institutions as to their support or otherwise for this proposal and what might follow from it. Institutions are invited to respond to the following questions:
 - a. Would you support the proposed discontinuation of the research-output UKPIs (Table R1)?
 - b. Would you consider that other existing measures (such as the Research Excellence Framework, performed every 6 to 7 years) are adequate for your purposes with respect to institution-level information on research activities?
 - c. Alternatively, is a replacement research-related UKPI desirable?
 - d. If a replacement UKPI is desirable, would your preference be to phase out the existing Table R1 measures only when new measures are available? Or would you support the discontinuation of Table R1 at the earliest opportunity, with new measures to follow in due course? (Bear in mind that this would most likely necessitate a period of time in which no UKPIs were published in relation to research activities.)
- 50. Institutions are invited to note that the opportunity to provide feedback on the proposed discontinuation of Table R1 is not limited to UK providers of HE. The UKPIs are Official Statistics

and, in accordance with the conditions associated with Official Statistics, the UKPISG will be seeking the views of a range of relevant users and stakeholders. The questions listed above will also be asked of the governments of the four UK nations, the Research Councils and other interested bodies.

Providing feedback

- 51. Further information regarding the background to the fundamental review of the UKPIs, as well as some of the proposals outlined above, is available from the minutes of the meetings of UKPISG held since 2010. These minutes are available alongside the UKPIs and associated content on the HESA web-site.
- 52. All other enquiries, and all feedback, should be submitted to the UKPISG secretariat at ukpisg@hefce.ac.uk. Feedback should be submitted before **noon on Friday 24 January 2014**.

Yours sincerely

Heather Fry

Director (Education, Participation and Students)

Annex A – Recommendations regarding the future of the UK Performance Indicators

Following a fundamental review of the UK Performance Indicators, the UK Performance Indicators Steering Group (UKPISG) has accepted and will implement a series of recommendations in relation to the UKPIs. These recommendations are as listed below:

Recommendation 1: UKPIs and their associated benchmarks have value and should therefore be retained.

Recommendation 2: In principle, UKPIs should continue to have UK-wide coverage.

Recommendation 3: UKPIs should continue to focus on UK-wide sector-level priorities and provide both sector-level and institutional level measures and benchmarks in these areas.

Recommendation 4: The key features of the current UKPI approach should be retained. A set of guiding principles should be developed (building on those from a 2006 review of the UKPIs) and used by the UKPISG to judge the appropriateness both of making changes to the existing UKPIs and of introducing any new UKPIs suggested for the future.

Recommendation 5: The current set of UKPIs should undergo a more detailed review to ensure they use the most appropriate data and have the appropriate focus to measure the specified topics, including the scope of the population covered.

Recommendation 6: Within the context of recommendations 2 and 3 above, the feasibility of broadening the coverage of UKPIs into five new areas (mostly beyond teaching and learning) should be explored: i) value added, ii) financial sustainability, iii) teaching quality, iv) international outlook and v) employer and business engagement.

Recommendation 7: Specific individual institution-level operational indicators that move beyond UK-wide sector level priorities should be developed as necessary through other means, such as the improved functionality of the Higher Education Information Database for Institutions (HEIDI), rather than as separate UKPIs. HEIDI is available to all full subscribers to the Higher Education Statistics Agency.

Recommendation 8: Students (prospective and current) should not be considered a direct audience of UKPIs, and instead the information contained in UKPIs should be disseminated to students indirectly through mediating bodies.

Recommendation 9: The introduction of any additional UKPIs or amendments to existing UKPIs must involve further dialogue with the sector to ensure buy-in.

Annex B – Proposal for guiding principles for the UK Performance Indicators

1. Recommendation 4 for the future of the UK Performance Indicators (UKPIs), as accepted by the UK Performance Indicators Steering Group (UKPISG), states that:

'The key features of the current UKPI approach should be retained. A set of guiding principles should be developed (building on those from a 2006 review of the UKPIs) and used by the UKPISG to judge the appropriateness both of making changes to the existing UKPIs and of introducing any new UKPIs suggested for the future.'

- 2. In response to the recommendation outlined above, and building on suggestions made by the 'Fundamental review of the UK Performance Indicators', a set of guiding principles for UKPIs has been proposed by UKPISG. It is anticipated that these principles will be used by UKPISG to guide its governance of the UKPIs, and in particular to assess the utility of the UKPIs to their key audiences. Any new or amended UKPI will be assessed against each of the principles listed below to explore whether it should (and, to some extent, could) be produced at sector and individual institution level, or at sector level only. It should be noted that UKPISG intends the principles to be guiding rather than binding.
- 3. UKPISG notes the collaborative nature of its governance of the UKPIs, with representation from Government, funding bodies and the sector. It is within this context that UKPISG reserves the right to consider the merits of any new or amended indicators on a case-by-case basis as necessary. The group also reserves the right to revise the set of principles over time, as required or appropriate to ensure its continued successful governance of these measures. Notwithstanding this, the group notes and will stand by Recommendation 9 of those recommendations accepted by UKPISG, which states that:

'The introduction of any additional UKPIs or amendments to existing UKPIs must involve further dialogue with the sector to ensure buy-in.'

Proposed guiding principles for UKPIs

A: Coverage and scope

A1: UKPIs should normally seek to reflect the totality of higher education (HE) provision and institutions across the UK.

A2: UKPIs should measure what matters, notably underpinning long-term policy goals for the sector and reflecting the core mission of a significant proportion of institutions. In some areas sector-level only measures might be more appropriate than those at institution level.

A3: UKPIs should, as standard, provide an aggregate picture of UK HE and allow institutions to compare themselves to other institutions in the different nations across the UK. In addition there may be a requirement for a small number of nation-specific indicators that reflect differing national contexts.

A4: Taken together, the UKPIs and their associated benchmark values should provide information in the public domain that is not otherwise easily available. There must be a value to a wide range of stakeholders in publishing the UKPI and benchmark values at institutional level.

B: Quality of data

- B1: UKPIs should be produced by a credible and independent organisation.
- B2: UKPIs should be evidence-based and statistically robust, conforming to recognised best practice in the production of statistical information. Data used for the indicator should be of high quality collected in a consistent and fair way across the sector; they should have a good sample base, use consistent definitions, and use a transparent methodology.
- B3: UKPIs should normally have longevity/continuity, enabling a time series to be developed and the ability for users to conduct longitudinal analysis.
- B4: UKPIs should be produced in a regular and timely fashion and where possible, be produced annually. However it is acknowledged that it may not be sensible for all new UKPIs to be produced annually, especially where to do so would be costly or put too much of a burden on institutions.

C: Dissemination

- C1: The UKPIs and their associated benchmark values should be free and available to all.
- C2: Details of the methodology and benchmarking process used in the production of the UKPIs should be published for the benefit of institutions, bodies acting on behalf of institutions, government bodies and agencies and any other interested parties. No institutional-level results should be published before giving the participating higher education providers an opportunity to correct errors of fact.
- C3: Publication of the UKPIs and their associated benchmarks should include appropriate guidance and contextualisation so as to facilitate accurate interpretation of the measures and the outcomes that they seek to represent.

D: Benchmarking and enhancement

- D1: UKPIs should be directional and attributional measures. There must be general agreement as to what represents a positive or a negative outcome, and that movement in values can be attributed to changes in sector or institutional activity rather than solely reflecting wider extraneous factors. This enables users to understand the direction of travel of the sector and of individual institutions, and so UKPIs can be used to underpin policy development and evaluation as well as institutional performance enhancement.
- D2: There should be an expectation that institutions will take note of their indicators and benchmarks, look carefully at any differences occurring with a view to further exploring areas of weakness in their institutional performance, and ultimately strive to improve.
- D3: UKPIs and their associated benchmarks should not be presented in such a way as to imply any institutional ranking. They should provide information for external policy-making stakeholders that is suitable for informing policy, and information for institutions that is suitable for internal use.
- D4: The benchmarks provided in association with UKPIs should take account of context and differing institutional characteristics, thereby supporting fair comparison of indicators between institutions.

E: Burden of data collection

E1: Where possible, existing data sources should be used to develop new UKPIs and/or to improve existing UKPIs. Any proposal to collect further data should be carefully costed through

dialogue with the sector or their representatives, and justified in terms of anticipated use and usefulness. The UKPISG should be mindful that the UKPIs should not place undue burden on the sector.

F: Influence on behaviour

F1: Publishing UKPI and benchmark values at institutional level must not knowingly create perverse incentives or lead to perverse behaviour.

F2: UKPIs should comply with all relevant legislation and evolving best practice, particularly in the areas of statistical disclosure control and support of fair competition between institutions.