

Non-Statutory Guidance for Higher Education Providers on Transparency in Advertising

Introduction

This guidance is to help higher education providers to improve the transparency and consistency of advertising, at provider and subject level.

It sets out that advertising, whether online or offline, should include comparable data on the percentage of students projected to complete their course, and the percentage progressing to a good outcome. This guidance sets out the data set that should be used, when and how it should be presented, and how to deal with cases where data is not available; for example, advertising which covers new courses, or courses for which data has been suppressed.

We are asking that providers act on this guidance voluntarily in all new advertising, though we will be monitoring the level of take up, and seeking feedback on providers' experiences of implementation. We are not asking providers to rewrite advertising that has already been signed off. Review of progress will allow both for finessing of the guidance and, if take up proves to be insufficient, consideration of whether this should be made mandatory.

It is not possible for this guidance to cover all eventualities, and we would not want to be overly prescriptive about detail. In complying with it, we would encourage providers to bear in mind the spirit of the request and if in doubt make sensible judgements about how to implement it in that light.

Scope

The expectation is that the data should reflect provider and subject level data (as appropriate) for full-time UK domiciled students at higher education providers in England. Higher education provider, in this context, refers to those providers registered with the Office for Students. The courses and subjects in scope are for first degree students (including integrated masters) only. Foundation degrees and postgraduate degrees (with the exception of integrated masters) are excluded, as are degree level apprenticeship standards. Courses where the majority of students are part-time, and/ or where the majority are not domiciled in the UK are also not in scope.

Rationale

OfS Proceed data has shown considerable variations in the completion rate and graduate outcomes both between different subjects and between providers. It is reasonable that prospective students should be made fully aware of this data, so that they can make meaningful comparisons between subjects and between providers before they make decisions about what course to take and where to study.

While this data is publicly available, as things currently stand, it generally requires some inside knowledge and a certain amount of persistence for prospective students to access it. Making it more prominent by incorporating it into course advertising in a standardised way should help achieve the wider aim of assisting and encouraging students to make better informed decisions about post-18 study.

Data Source

The two pieces of data to be quoted are the two component metrics which are used to calculate the OfS Proceed data (i.e. the 'completion rate' and 'graduate outcome/ progression rate'). There is no expectation that providers quote the combined metric. The source (and this is the only source that should be used) is that which can be found below:

[Projected completion and employment from entrant data \(Proceed\): Updated methodology and results - Office for Students](#)

The data presented should be at the level appropriate to the advertisement. If the advertisement relates to the provider as a whole, provider-level data should be used. If a course or subject is being advertised, the data presented should be for the relevant subject grouping¹, unless subject level data is not available in which case provider-level data should be quoted instead.

How to present the data

The data should be positioned prominently on all institutional and subject specific advertising. We would suggest that the font size for the data should be of the same size as that of the main body of the text, though it could be of smaller size to the headline. It should appear in a prominent position in the opening lines of any advert, as in these examples:

<p>Study X at the University of Y</p> <p>[Insert Subject Group name] Completion Rate: 85% Professional Employment or Further Study Rate: 75%</p>

<p>The University of Y</p> <p>Completion Rate: 78% Professional Employment or Further Study Rate: 81%</p>
--

It is important that you are able to explain what the data means and indicate the data source. In hard copy, we would ask that a note, 'source: Office for Students Proceed Data' with URL for the appropriate hyperlink should appear at the bottom of the text. In the case of digital advertising, this note could be provided through a hypertext link. Where the advertisement carries a link that takes a viewer to a university website or landing page, that page should contain a more detailed description of what the data means. Our suggested wording would be as follows:

The data is provided by the Office for Students (see here): [Projected completion and employment from entrant data \(Proceed\): Updated methodology and results - Office for Students](#). [If appropriate Course X is included within the broader subject group Z and this measure is based on students studying within subject group Z at the University of Y.]

The completion rate is a projection of the likelihood of students who start a course in this subject completing it. It is based on the patterns of student retention and completion observed in one year using the most recently available student data; the higher the percentage the better. The professional

¹ Proceed data displays subjects at the Common Aggregation Hierarchy level 2 groupings

employment or further study rate covers the % of completing students achieving a positive outcome, which could include professional employment, or going on to further study, or other outcomes that may be positive for the individual; the higher the percentage the better.

If you wish, you could add further links to *Discover Uni* data, and/or to the course web pages.

Other forms of advertising

1) Web pages

The data should be displayed in a prominent position on the main web page for each subject or course. A reasonable test of this would be that it can be seen on landing without having to scroll down.

2) Social media

The guidance includes advertisements that are displayed on social media. We understand that the precise message and amount of text could vary considerably according to circumstance, and the principles set out in this guidance should be followed to ensure the data is clearly seen in each case.

3) TV and Radio

The data should be quoted in any script that is used for advertising on TV or Radio. We would suggest it should be as follows: 'Completion rate x; professional employment or further study rate y. Data sourced from Office for Students Proceed data, available at www.officeforstudents.org.uk'.

4) Influencers

Messaging from influencers (where they are being paid in cash or in kind to promote the provider or its courses) should also be accompanied by the appropriate data, using the text suggested above.

Date of implementation

Our expectation is that providers will act in accordance with this guidance in relation to any course and/or subject advertising either newly commissioned or formally reviewed from the date at which this guidance is published, and that this data will be incorporated on websites in line with usual updates.

There is no expectation that providers incorporate data retrospectively. We are aware that lead in times for prospectuses and for hard copy advertising may be considerable, and that you will quite possibly already have signed off course advertising for the next admissions cycle. We know that for many providers incorporation of the data onto web pages will be a crucial stage, and we understand that changes to the web pages go through sometimes quite extended processes of sign-off, meaning that changes may well only occur at one fixed point in the year.

We do not expect any provider to go back and amend any advertising or web pages that have already been signed off, although providers are free to update content earlier, if they wish to.

The most recent set of Proceed data is the one that should be used in all newly commissioned advertising material. The Office for Students has recently consulted on its approach to using data to measure quality and standards. This will lead to the development of new metrics for continuation and progression, which will replace those currently used in the Proceed data. When these new metrics are published, we expect providers to switch to using this data for any newly-commissioned material.

Frequently Asked Questions

1) What advertisements are in scope?

This guidance is intended to cover any promotion of the provider as a whole, its individual courses, or subjects.

A marketing officer giving a talk about the institution, or a particular set of courses, or a lecturer promoting her/his subject at an open day, or similar event, would not be expected to routinely quote the data. However, any accompanying material that promotes the institution, or its courses and subjects would be expected to incorporate the data.

It covers all advertising that has been paid for, including payments to internet search engines and to influencers. It would not cover supportive testimonies from past and present students, provided they had not been paid to provide them.

2) What do we do if the data for the subject group within which the course we are advertising sits either doesn't exist, or has been suppressed?

The data presented should be at the lowest aggregation for which Proceed data is available. Normally this will be at Common Aggregation Hierarchy level 2. However, where subject level data is not available, provider-level data should be quoted instead. The suggested format for presentation remains the same as in the above example, except that 'not available' is indicated where there is no data available, including at provider level.

<p>Study X at the University of Y</p> <p>[Insert Subject Group name] Completion Rate: 78%; Professional Employment or Further Study Rate: not available</p>

The note explaining the data (see above for advice on placing) should be amended to provide whichever of the two additional lines is most appropriate to explain the 'not available'. It can be adapted according to circumstance.

The data is provided by the Office for Students (see here): [Projected completion and employment from entrant data \(Proceed\): Updated methodology and results - Office for Students](#). Course X is included within the broader subject group Z and this measure is based on students studying within subject group Z at the University of Y. The completion rate is a projection of the likelihood of students who start a course in this subject completing it. It is based on the patterns of student retention and completion observed in one year using the most recently available student data; the higher the percentage the better. The professional employment or further study rate covers the % of completing students achieving a positive outcome, which could include professional employment, or going on to further study, or other outcomes that may be positive for the individual; the higher the percentage the better.

In this case completion rate and/or professional employment or further study data [amend as appropriate] is not available. [a] This is because this course/ these courses have not yet run/ have not been running long enough for this data to be available. [b] This is either because the course size is small or there were not enough responses to produce data. [use a or b as appropriate]. This does not reflect on the quality of the course.

3) What do we do if the course we are advertising is covered by more than one subject group?

The data should relate to the majority subject area, according to the badging of the degree and its course content.

If a course straddles two subject groups, and the data for one subject group has been suppressed or doesn't exist you should use the data for the other subject group.

If there is an exact split (for example 50/50), the data for both subjects should be quoted, as in the following example:

<p style="text-align: center;">Study Literature and Philosophy at the University of Y</p> <p>Literature Completion Rate: 90% Professional Employment or Further Study Rate: 65%</p> <p>Philosophy Completion Rate: 82% Professional Employment or Further Study: 78%</p>

If there is an exact three-way split or higher, or for courses that cover a wide variety of subject groupings with no clear majority subject area, provider level data should be used.

4) How should we present the data in advertisements for multiple courses across multiple subject groups?

In these cases, provider level data should be quoted. This should be sufficient so long as the individual web pages quote the subject level data.