APPENDIX 31: U.K. Advertising Standards and Berlin Ranking Principles

31.A: U.K. Advertising Standards Authority. Universities: Comparative Claims

https://www.asa.org.uk/advice-online/universities-comparative-claims.html

Examples from BBC: http://www.bbc.com/news/education-41984465

 Note: This advice is given by the CAP Executive (Committee on Advertising Standards) about non-broadcast advertising. It does not constitute legal advice. It does not bind CAP, CAP advisory panels or the Advertising Standards Authority.

Universities may wish to help prospective students make a decision by making comparative claims with other institutions, whether about students' grades, rankings, teaching, student experience or other aspects. Choosing a University can be a difficult decision and a big commitment, and it is important that advertisers do not make claims which could mislead would-be students into making the wrong decision. Code rules **3.33 to 3.37** apply to comparisons with identifiable competitors.

Establish what type of comparative claim you wish to make

When making a claim, you should consider how the reader will interpret it; make sure the claim is not ambiguous. Common types of claims are "**best**", "**no. 1**", "**leading**", ranking, and **top parity**. Different types of claims will require different types of evidence.

Make sure you hold the relevant evidence

If making a claim which readers are likely to interpret as **objective**, advertisers must ensure that they hold robust evidence to substantiate it.

An ad for East Anglia University which stated "Top 5 for student satisfaction (National Student Survey 2005-2016)" was ruled against because it did not make it clear what this claim was based on and the advertiser did not have sufficient evidence to substantiate the claim as it would be understood by consumers (**University of East Anglia, 15 Nov 2017**).

The ASA also upheld a complaint against an ad for Falmouth University which stated "The UK's No 1 Arts University (for three years running)" and "THE UK'S NUMBER ONE CREATIVE UNIVERSITY", because the advertiser did not have sufficient evidence to substantiate the claims (**Falmouth University, 15 Nov 2017**).

Make the basis of the claim clear and include necessary qualifications

The ASA has upheld complaints about multiple ads for universities which have not made the basis of comparative claims clear (**University of Leicester, 15 Nov 2017** and **Teesside University, 15 Nov 2017**). An ad for UWL which stated "named as London's top modern university - and one of the top 10 in the UK - in the Guardian

University Guide 2018" was ruled misleading by the ASA, which considered that, in the absence of qualification, the term "modern universities" was ambiguous. The ASA reminded the advertiser to ensure that in future, claims which may be interpreted in differing ways should be qualified sufficiently. The ASA also found that the advertiser did not have sufficient evidence to substantiate the claim (**University of West London, 15 Nov 2017**).

For more information see our AOL on **Claims that require qualification**.

Accurately represent the evidence

Advertisers should ensure that the claims they make do not exaggerate or go further than the evidence held. An ad for the University of Strathclyde included a headline which stated "We're ranked No.1 in the UK", with text below this stating "The Department of Physics at the University of Strathclyde, in the centre of Glasgow, has been rated number one in the UK for research in the REF 2014." Whilst the advertiser had evidence that 40% and 56% of their research was rated world class or excellent respectively, the REF 2014 results did not formally rank the universities. The University of Strathclyde only provided evidence of being ranked as "No.1" for physics research by the Times Higher Education's analysis of the REF 2014 results, rather than directly by the REF 2014 assessment. As such, the ASA ruled that the ad was misleading and told the advertiser to ensure they only make claims for which they have evidence (**University of Strathclyde, 15 Nov 2017**).

Make comparative claims verifiable

The Code also states that all comparisons with identifiable competitors must be verifiable. This means that the advertiser should set out the relevant information in the ad or signpost to where the information used to make that comparison can be checked by the target audience. See our AOL on **Comparisons: Verifiability** for more information.

BERLIN PRINCIPLES ON RANKING OF HIGHER EDUCATION INSTITUTIONS

http://iregobservatory.org/en/index.php/berlin-principles

Rankings and league tables of higher education institutions (HEIs) and programs are a global phenomenon. They serve many purposes: they respond to demands from consumers for easily interpretable information on the standing of higher education institutions; they stimulate competition among them; they provide some of the rationale for allocation of funds; and they help differentiate among different types of institutions and different programs and disciplines. In addition, when correctly understood and interpreted, they contribute to the definition of "quality" of higher education institutions within a particular country, complementing the rigorous work conducted in the context of quality assessment and review performed by public and independent accrediting agencies. This is why rankings of HEIs have become part of the framework of national accountability and quality assurance processes, and why more nations are likely to see the development of rankings in the future. Given this trend, it is important that those producing rankings and league tables hold themselves accountable for quality in their own data collection, methodology, and dissemination.

In view of the above, the International Ranking Expert Group (IREG) was founded in 2004 by the UNESCO European Centre for Higher Education (UNESCO-CEPES) in Bucharest and the Institute for Higher Education Policy in Washington, DC. It is upon this initiative that IREG's second meeting (Berlin, 18 to 20 May, 2006) has been convened to consider a set of principles of quality and good practice in HEI rankings - **the Berlin Principles on Ranking of Higher Education Institutions**.

It is expected that this initiative has set a framework for the elaboration and dissemination of rankings - whether they are national, regional, or global in scope - that ultimately will lead to a system of continuous improvement and refinement of the methodologies used to conduct these rankings. Given the heterogeneity of methodologies of rankings, these principles for good ranking practice will be useful for the improvement and evaluation of ranking.

Rankings and league tables should:

A)   Purposes   and   Goals   of   Rankings

1. *Be one of a number of diverse approaches to the assessment of higher education inputs, processes, and outputs.* Rankings can provide comparative information and improved understanding of higher education, but should not be the main method for assessing what higher education is and does. Rankings provide a market-based perspective that can complement the work of government, accrediting authorities, and independent review agencies.

2. *Be clear about their purpose and their target groups*. Rankings have to be designed with due regard to their purpose. Indicators designed to meet a particular objective or to inform one target group may not be adequate for different purposes or target groups.

3. *Recognize the diversity of institutions and take the different missions and goals of institutions into account*. Quality measures for research-oriented institutions, for example, are quite different from those that are appropriate for institutions that provide broad access to underserved communities. Institutions that are being ranked and the experts that inform the ranking process should be consulted often.

4. *Provide clarity about the range of information sources for rankings and the messages each source generates*. The relevance of ranking results depends on the audiences receiving the information and the sources of that information (such as databases, students, professors, employers). Good practice would be to combine the different perspectives provided by those sources in order to get a more complete view of each higher education institution included in the ranking.

5. *Specify the linguistic, cultural, economic, and historical contexts of the educational systems being ranked*. International rankings in particular should be aware of possible biases and be precise about their objective. Not all nations or systems share the same values and beliefs about what constitutes "quality" in tertiary institutions, and ranking systems should not be devised to force such comparisons.

B) Design and Weighting of Indicators

6. *Be transparent regarding the methodology used for creating the rankings*. The choice of methods used to prepare rankings should be clear and unambiguous. This transparency should include the calculation of indicators as well as the origin of data.

7. *Choose indicators according to their relevance and validity*. The choice of data should be grounded in recognition of the ability of each measure to represent quality and academic and institutional strengths, and not availability of data. Be clear about why measures were included and what they are meant to represent.

8. *Measure outcomes in preference to inputs whenever possible*. Data on inputs are relevant as they reflect the general condition of a given establishment and are more frequently available. Measures of outcomes provide a more accurate assessment of the standing and/or quality of a given institution or program, and compilers of rankings should ensure that an appropriate balance is achieved.

9. *Make the weights assigned to different indicators (if used) prominent and limit changes to them*. Changes in weights make it difficult for consumers to discern whether an institution's or program's status changed in the rankings due to an inherent difference or due to a methodological change.

C) Collection and Processing of Data

10. *Pay due attention to ethical standards and the good practice recommendations articulated in these Principles*. In order to assure the credibility of each ranking, those responsible for collecting and using data and undertaking on-site visits should be as objective and impartial as possible.

11. *Use audited and verifiable data whenever possible*. Such data have several advantages, including the fact that they have been accepted by institutions and that they are comparable and compatible across institutions.

12. *Include data that are collected with proper procedures for scientific data collection*. Data collected from an unrepresentative or skewed subset of students, faculty, or other parties may not accurately represent an institution or program and should be excluded.

13. *Apply measures of quality assurance to ranking processes themselves*. These processes should take note of the expertise that is being applied to evaluate institutions and use this knowledge to evaluate the ranking itself. Rankings should be learning systems continuously utilizing this expertise to develop methodology.

14. *Apply organizational measures that enhance the credibility of rankings*. These measures could include advisory or even supervisory bodies, preferably with some international participation.

D) Presentation of Ranking Results

15. *Provide consumers with a clear understanding of all of the factors used to develop a ranking, and offer them a choice in how rankings are displayed*. This way, the users of rankings would have a better understanding of the indicators that are used to rank institutions or programs. In addition, they should have some opportunity to make their own decisions about how these indicators should be weighted.

16. *Be compiled in a way that eliminates or reduces errors in original data, and be organized and published in a way that errors and faults can be corrected*. Institutions and the public should be informed about errors that have occurred.

Berlin, 20 May 2006