

HESA Consultation – May 2019

Independent Higher Education Response

ESTATES MANAGEMENT RECORD

3. Do you use the data included within this record? No

4. If so, for what purposes?

Members of Independent Higher Education (IHE) have never submitted this record as they have not traditionally received public funding and therefore were not included in the record. Our members feel they do not have the same understanding of the record as those who submit the data would have, and this diminishes their ability to use the record. Despite now being granted access to the data through HEIDI Plus, their lack of historical knowledge has resulted in very limited use, but this may change if they participated in the record.

5. Does the access to the UK-wide picture determine much of the value of this collection? No

6. With what frequency would the data need to be collected to meet your needs?

n/a

7. Are there any areas of the collection that you feel are not necessary?

Most IHE members felt the majority of the collection was not necessary. Many independent higher education providers have complex models for their estates, which include high frequency of leasing models, ownership across multiple companies or charities, and shared spaces with other institutions or businesses. These models would make it almost impossible to submit the return in its current form without considerable additional guidance.

Members also expressed a concern that estates data collected which was not representative of the UK HE sector would be used in policy decisions that would then have a detrimental impact on these providers. In particular, IHE have noted several recent policy decisions which have used existing HESA data which did not include independent providers and it has resulted in policy decisions which place unreasonable burden on independent providers or simply exclude independent providers from participation. We ask HESA to consider carefully the use of the data they produce and how returns which do not reflect the diversity of the HE sector may be used incorrectly as a representative of the whole. Any data which does not have a full return should be marked clearly as such and should not be used for policy decisions.

8. Are there any areas that are not currently collected, but which you would like to be collected?

Yes

9. If so, what and to what purposes would you put it?

Members identified that they would like to have data which would help them better understand the cost of leasing space designated for educational use. This would be useful for future planning and for existing negotiations on the cost of these spaces.

10. Are you likely to continue to subscribe to this record when the cost is part of a voluntary subscription? No

STAFF RECORD

11. Do you use the data included within this record? Yes

12. If so, for what purposes?

IHE members had limited or no use of the staff record. The primary use of the staff record was to explore staff to student ratios, particularly within specialisms and similar sized providers.

Most IHE members reported that the staff record data did not reflect their own provision. This was particularly the case for specialist providers who taught highly vocational courses and whose staff qualifications were more diverse than traditional higher education providers, as the record did not reflect the qualifications they valued.

13. Does the access to the UK-wide picture determine much of the value of this collection? No

14. With what frequency would the data need to be collected to meet your needs?

n/a

15. Are there any areas of the collection that you feel are not necessary?

IHE members found it difficult to assess the value of the staff collection, as they have not submitted the data before. Very few independent higher education providers have research-only staff, while many have high levels of sessional or professional staff, which they identified as not always being reflected in the way the fields are designed. As such, they didn't find many fields useful but did not know enough to call them unnecessary.

16. Are there any areas that are not currently collected, but which you would like to be collected? Yes

17. If so, what, and to what purposes would you put it?

IHE members would like to see more industry qualifications reflected in the data. This would allow them to understand the range of non-university qualifications that are valued in specialist areas.

Independent providers also reflected on the design of PT/FT staff field. They felt it would be valuable to have more granular data on staff contracts, in particular where staff are sessional or flexible in their contracted hours. This detail would support vocational and specialist providers who often engage industry professionals to teach, as well as providers who engaged external tutor staff to support small group teaching on academic skills. These areas were of more importance than research staff to our members.

18. Are you likely to continue to subscribe to this record when the cost is part of a voluntary subscription? No

GENERAL

19. Is there anything else that we should collect? **Yes**

20. If so, what and to what purposes would you put it?

Level 3 'Foundation' activities: HESA should seek to collect information on level 3 courses which are specifically for progression into higher education and may or may not be a qualification in their own right. Many of these courses are offered by higher education providers and most are not returned in any existing centralised data source as they are technically below level 4. Students in these courses include international students and widening participation students who require additional study to access their higher education course for a variety of reasons. While some Level 3 foundation courses are collected as part of the Individual Learner Record (ILR) many of these courses are not as they are within higher education institutions with little or no relationship with the Education and Skills Funding Agency (ESFA).

Collecting data on Level 3 courses that are intended for transition into HE specifically would achieve a number of essential outcomes. This data would significantly improve understanding of international students in the UK. It has been estimated that 40% of international students come through one of these programmes but because the data is not collected there is no verifiable evidence that this is true. The UK's new international education strategy recently launched by the Departments for Education and for International Trade has the aim of improving this data and HESA is the most experienced in collecting international student data across the education sector. This collection could be partly funded by and in the furtherance of this strategy.

Collecting and identifying these pre-degree transition courses would also greatly aid our understanding of widening participation, especially for students from schools that do not achieve the A-level results consistently and mature students returning to study. These courses are essential to many students in widening their access to higher education, but most students are not returned to any central data source and as such providers and policy makers cannot understand their impact. The creation of the Evidence and Impact Exchange for widening access and participation is a clear indicator of the importance of this information to higher education. We hope the Exchange body and OfS would contribute to the cost of collecting this data.

Transition to Postgraduate Courses: There is an emerging group of courses which support students to transition into postgraduate study. These courses remain largely outside of public funding and therefore have not been included in returns from our members previously. They are also popular with international students, and many of the providers new to HESA after joining OfS for their Tier 4 licence, teach these courses. There has been significant interest from policy makers and the Universities Minister in these courses as well, as they aid widening participation in postgraduate study. IHE would like to ensure that they can be identified within the data to support these policy decisions. It is unclear at the moment how these courses would be reported and if they could be identified clearly within the data.

Professional Courses: An increasing number of higher education providers, across all sizes and types, are offering professional courses. These do not equate to a degree at any level and are often shorter courses with less intensive study. In some institutions they are referred to as 'professional', in others they may be part of a life-long learning initiative. Student data from some of these courses is currently collected, but it is not clear that they should be included in either the HEI or AP return and when included they cannot easily be identified in the data.

Professional and lifelong learning courses are becoming a core part of the student journey as careers and employment changes for the 21st century. There was significant interest in these courses during the Augar review but the data wasn't easily accessible. Political parties and student and education groups called for better funding for further study like this, and our members have seen a distinct trend of students moving away from the degree model into these courses to get into work more quickly. We anticipate a significant focus on these courses at both domestic and international policy level and feel it would be useful for HESA to collect these in a way that they can be clearly identified as professional non-degree study.

Diverse delivery models: While our members accept that HESA already collects information on their students undertaking diverse delivery models, such as accelerated degrees and credit-based learning, they remain concerned that they cannot use the data to identify these courses and support their understanding of these models. It is not possible through the HEIDI Plus database to identify these types of courses clearly, and as such, the impact of regulation decisions, planning for new courses and understanding success are all incredibly difficult. We urge HESA to explore how these courses could be more clearly identified in the data to support better regulation, increased understanding for policy decisions and most importantly, better benchmarking by institutions and government.

21. Are there any other services or activities that you would like to see provided to support the minimisation of burden?

IHE members identified three areas where they feel HESA could better support the minimisation of burden:

Student Data Systems: The existing manual upload tool is a significant additional burden for smaller providers of higher education. While they may have a central data storage system for the information they return to HESA, without one of the large and costly student records systems they are forced to use the manual return system. IHE members feel strongly that HESA has a role in developing an upload system that is able to return multiple students as well as support providers to improve data quality. This system would support the reduction of burden at both the upload and queries parts of the submission as it would drastically reduce the level of potential for human error currently seen with manual upload. For many smaller providers, an expensive data system is a financial burden they cannot justify to students as value for money. An alternative for smaller providers has not been forthcoming from the private sector and so there is a clear role for HESA to look at the manual upload and find a less burdensome solution.

Training in Data Quality: IHE members are unlikely to have experts in data quality within their permanent staff. Their data returns are completed by members of staff who need to be experts in many other areas 11 months of the year and become a HESA expert for the weeks leading up to the submission date. Additional training and support for data capability and data governance should significantly reduce burden for IHE members as the tasks of data collection and submission would become more efficient and queries and errors would be avoided, reducing burden in these stages of the data submission process. Training should also be tailored to experience, with specific training for providers and staff who are new to HESA, as many providers have a high turnover in this role.

Longer and more flexible deadlines: Some IHE members feel that the current HESA return timeline does not give the time they need to investigate Minerva queries. These investigations require a more expedited response from HESA or OfS than is often able to be given due to the volume of queries, which can delay investigations until the last submission deadline.

As stated in this consultation, HESA already undertakes work to measure burden for HE providers and HESA, particularly in times of change. We would encourage HESA to consider burden specifically in two areas: size of provider and new to HESA. These two groups of providers are likely to experience a different level of burden in response to changes and it would be useful to understand this and take action to reduce it where possible.

22. Are you willing to support the continuation of the Data Landscape Steering Group (DLSG) and its role in the sector through your HESA subscription? Please explain your answer.

IHE members have had little interaction with DLSG, primarily through Gordon Sweeney, a member of the group, who gathers feedback through our forums which discuss the data landscape. We encourage DLSG to engage more with providers new to the landscape and with IHE as the representative body for some of the newest subscribers. Engaging with representative bodies can ensure that DLSG has a wider perspective of the issues and challenges faced by providers.

DLSG must continue its primary responsibility of reducing burden on HE providers, but for IHE members it must do more to foster collaboration between HE providers and data collectors and drive efficiency in the current myriad data submissions that providers undertake. It is right to have a vision to have fewer organisations making direct data demands on HE providers, but members indicate they remain dissatisfied by the progress made to date.

IHE members feel any subscription model for DLSG should be on a per-student basis to ensure that fees would not exacerbate the already disproportionate cost of collecting, storing and returning data for small and specialist providers. Subscriptions to sector bodies remove funding from the student experience and this can be disproportionate in smaller providers.

23. Do you have any feedback regarding the activities detailed above that we are proposing to continue?

IHE members responded very positively to many of the activities HESA is proposing to continue. In particular, they felt the excellent communication skills and supportive activity of the liaison team should be noted and wanted to ensure that the same or additional support is given to this team as this is the area they felt was of most value.

Members were concerned that not enough resource was going into the Graduate Outcomes survey activity. The low response rates for Cohort A were concerning but members also felt communication with this team could have been better to support the change from DLHE to Graduate Outcomes.

We strongly encourage HESA to review the SIC/SOC coding currently identified as it does not reflect the vocational nature of some of the higher education programmes delivered by our members. SOC coding remains static where many vocational careers have diversified and higher education degrees support students to undertake more complex roles within the vocation that are simply not well understood in the current coding system.

We would like to work with HESA to explore potential changes to populations and aggregations to aid better analysis of data by delivery model and data on students undertaking transition courses at both pre-undergraduate and pre-postgraduate level as stated in question 19.

24. Are there any activities that we have identified as statutory that you believe are not essential for your organisation? If so, please identify which and if appropriate why.

No.

25. Are there any additional activities you require from HESA to support you in your data submission activities, and to meet your data quality assurance obligations? If so, please identify which and if appropriate why.

IHE members feel strongly that more training and support is needed from HESA to ensure a reduced burden in data submission through better quality initial submissions and lower queries. There are a number of key training sessions that members have identified including specific support for providers who will join HESA in 2019 but are not yet on the OfS Register. Members also shared a need for increased support for new staff members as due to size they often lose significant capacity when a staff member leaves the organisation. Specific training that brings together providers who do not have one of the large student records systems, which allow for efficient returns, would also be welcome. IHE has worked closely with members to explore areas such as data visualisation, data governance and analytics, which we feel would support better data submissions if appropriate training could be provided. Unfortunately, IHE does not have the expertise to provide this and looks to HESA (and Jisc) to support our members in this area.

HESA also needs to explore the Minerva query system as our members experience re-occurring queries that, because of their delivery model, can never be addressed. For example, members with multiple start dates often have the same Minerva query each year for a group of students that has to be 'addressed' in the system individually. Those who offer accelerated degrees and run four instance periods instead of three receive the same warning every year that can be explained but not cleared and as such will always trigger a Minerva query. IHE would welcome the opportunity to discuss Minerva queries with HESA to explore potential systems changes that would eliminate these queries and thus reduce the time spent responding at each return.

26. The activities listed in section 4.1, when linked to non-statutory collections, will form part of the non-statutory subscription.

Are there any, if they were part of a voluntary subscription, that you do not believe are useful to your organisation? If so, please identify which and if appropriate why.

No

27. Are there any additional activities you require from HESA that you would like to support you in your data submission activities, and to meet your data quality assurance obligations? If so, please identify which and if appropriate why.

IHE members feel strongly that the data capability toolkit and its supporting materials and training, are as essential to statutory collection as they might be to any non-statutory collection that HESA would undertake. Therefore, we believe they should be part of the statutory subscriptions.

28. What uses are currently made of the UK Performance Indicators by your organisation?

IHE members have been part of the experimental performance indicators for two years. They report that they do not make use of the non-experimental performance indicators as they do not feel the benchmarking activity against large, multi-subject providers is as useful.

Members report using the indicators in particular to benchmark on widening participation statistics and non-continuation metrics. However, many are unable to participate due to small data sizes.

29. Do you support continued production and publication of the UK Performance Indicators by HESA? Yes

30. Please explain your answer

IHE members broadly support the UK Performance Indicators for a number of reasons, despite many not having large enough data sets to participate. Primarily IHE members place a strong value on the benchmarking activity that the UKPI provide, particularly the focus on widening participation groups from low socioeconomic backgrounds and mature students. Our members value the opportunity to understand better the impact of student characteristics on their retention and success as well as compare themselves to similar providers. This activity should continue to be produced by the sector and for the sector however HESA should be cautious that the burden of returning the data and the value to providers who cannot be included due to size is taken into consideration in any reviews of the UKPI or in funding their publication.

31. If you answered Yes, what do you believe the main role and purpose of the indicators should be, and how should they inter-relate to other relevant metrics published by UK governments, regulatory and funding bodies?

UK Performance Indicators are a new source of information for many independent higher education providers given the only recent publication of the first experimental statistics for UKPIs. They feel the experimental statistics have a core purpose to support providers to benchmark their performance against other, similar providers. The creation of the metrics by and for the education sector will ensure that this remains a core purpose.

Independent providers also support the role of UKPIs as a tool for policy makers but believe that they must adapt to changes in the education sector, such as the inclusion of their data and the different delivery models developing, in order to fill this role.

Members did express concern that metrics published by government, regulatory and funding bodies can produce contradicting data sets which can confuse policy makers and those seeking to use either metric as a mechanism for regulation or accountability. While they support the production of both UKPIs and other metrics, they feel strongly these should be aligned wherever possible to avoid confusion.

32. If you answered Yes, what do you think needs to change in the content, production processes or governance structures to ensure that the UK performance indicators can support the role and purpose you explained in the previous question?

Many IHE members feel strongly that UKPIs must change to continue to be relevant. The experimental statistics are making comparisons between those who undertake the HEI return and those who undertake the AP return which members feel are simply not comparable. In the future these returns will change into the OfS returns for Approved and Approved (fee cap) however there is no guarantee that the data will be comparable. We urge HESA to work to ensure there is comparable data within UKPI and consider whether or not the current data set should be published with the data as it is.

IHE members encourage HESA to consider delivery model in the adjusted sector benchmarks. Innovative models of delivery can have a transformative impact on access to higher education as well as on success after graduation. As some of these models do not follow accepted academic calendars or progression routes, they are not well reflected in the existing UKPIs. For example, an accelerated degree will have greater transition hurdles at the point of non-continuation than a traditional degree which makes it more difficult for providers to evaluate their performance and makes the data less useful for policy makers looking to evaluate the success of these delivery models for policy purposes. Delivery models which could be explored include accelerated degrees, credit-based delivery, blended learning, and foundation courses in particular as integrated into a degree course.

Benchmarking is a valuable insight for HE providers and one that if applied correctly can support providers to make targeted and positive changes for students and for the communities they serve. IHE members would welcome greater transparency on the benchmarking methodologies used to produce UKPIs, including more information about adjusted benchmarking. This would allow them to further monitor their own performance during the annual academic cycle.

33. We are currently reviewing the future of the DDS preview system for high profile data requests.

Do you value and use the DDS preview system? No

34. Would the presence of this or a similar system make you more likely to agree to opt in to onward data sharing? No

35. Category 1 - Uses of data that are for the direct benefit of HE providers.

Do you agree in principle to data collected for Category 1 in respect of your provider being shared by HESA? Yes

Yes No Unsure - If No or Unsure, please can you explain why?

36. Category 2 – Uses of data that are for the direct benefit of higher education sector bodies and organisations representing or serving HE providers

Do you agree in principle to data collected for Category 2 in respect of your provider being shared by HESA? Unsure

Yes No Unsure - If No or Unsure, please can you explain why?

As a representative body IHE has not been given access to the data hub or HEIDI Plus. While we feel the information in the hub may be useful for the activity we do, supporting our member institutions and working with policy makers in the interest of our members, we have been given little opportunity to interact with the data. The limited requests for data we have made have been diminished by the lack of data available for independent higher education providers. We would support category 2 use if IHE could have access to the data in the same way as other higher education sector bodies.

37. Category 3 – Uses of data that are for the benefit of students and academic researchers Do you agree in principle to data collected for Category 3 in respect of your provider being shared by HESA? Yes

Yes No Unsure - If No or Unsure, please can you explain why?

38. Category 4 – Uses of data that are for the benefit of students, academic researchers, prospective students and their representatives and graduate employers.

Do you agree in principle to data collected for Category 4 in respect of your provider being shared by HESA? Unsure

Yes No Unsure - If No or Unsure, please can you explain why?

Members expressed concern about some of the users of data within this category. Category 4 users are far less likely to understand the data they are viewing and are more likely to make assumptions on the data which are not accurate. League table producers, comparison sites and private companies may be familiar with the HEI student record but will be less familiar with the Alternative Provider Record and how it compares. Our members expressed concern in particular that the development of the Alternative Provider record has resulted in a confusing and inconsistent data set that could easily be misread by a less informed user. Recent comparisons between HEI data sets and the Alternative Provider student record show a misunderstanding of the timeseries, especially when considering the changes to the types of students included as the record has developed over the past three years. We

urge HESA to work closely with providers who have submitted to the Alternative Provider record for any use of this data set by users outlined in Category 5 in the future.

39. Category 5 – Uses of data that are essential or highly valuable for the activities of other public, private or third-sector organisations.

Do you agree in principle to data collected for Category 5 in respect of your provider being shared by HESA? Unsure

Yes No Unsure - If No or Unsure, please can you explain why?

Members expressed concern about some of the uses of data within this category. Category 5 users are also far less likely to understand the data they are viewing and are more likely to make assumptions on the data which are not accurate. Our members expressed concern in particular that the development of the Alternative Provider record has resulted in a confusing and inconsistent data set that could easily be misread by a less informed user. Recent comparisons between HEI data sets and the Alternative Provider student record show a misunderstanding of the timeseries, especially when considering the changes of the students included. We urge HESA to work closely with providers who have submitted to the Alternative Provider record for any use of this data set by users outlined in Category 5 in the future.

40. Category 6 – Provision of data to organisations that have a statutory power/function to collect data directly from HE providers

Do you agree in principle to data collected for Category 6 in respect of your provider being shared by HESA? Yes

Yes No Unsure - If No or Unsure, please can you explain why?

41. Within categories 1-6 above, are there any potential types of recipients or data services that you would not support and which you would like to see removed from one or more of the categories?

No

42. Do you have any further comments regarding onward use of data outlined or other uses not outlined above that you would like us to consider?

Our members have indicated that they would like to see the wider uses of the data considered when reviewing how the data is collected, categorised and reported. Members feel that changes could be made to allow the data to better support prospective student activity by allowing for the categorisation of courses with foundation programmes integrated, for accelerated degrees and for blended learning. These are currently very difficult to define within the data. They also feel that more should be done to ensure that the data is understood clearly including in HESA's own reporting on the data. For example in the 2018 Alternative Provider data release HESA's own summary highlighted the 18% reduction in part-time students. This change was almost entirely attributed to a single provider, teaching exclusively part-time courses, merging into a publicly funded provider and

joining the HEI data set. IHE managed several press queries reporting a failure of Alternative Providers to retain access for part-time students. Given the susceptibility of the Alternative Provider data to undue influence by a single provider HESA should ensure that these uses are considered when designing and reporting on data sets.

43. Data Futures: open commentary

As communicated on 12 March, Data Futures will not be going live in 2019/20. The team at HESA is working on a revised plan for delivering the student data collection for 2019/20. We will be working with the statutory customers to formalise plans and will provide further information in due course.

This is an opportunity to provide us with any feedback you want with regards the Data Futures Programme.

We support the development of Data Futures, however it has become clear that not only are HESA not prepared to roll out the Data Futures programme, providers are not prepared to manage it. Our members welcome the delay in that it gives the opportunity to better support providers to prepare for delivering the data as required by the new return. HESA must take this opportunity to support the development of data capacity in those providers who are new to data returns and those who are new to the regulated HE sector. Guidance must also be changed to reflect the new group of providers who will be returning data. These providers have a greater diversity of provision including unique delivery models, courses which are not formally on the FHEQ, and varied partnership models. IHE would welcome the opportunity to support HESA to develop a greater understanding of these new providers to facilitate the development of this guidance.

IHE strongly support the use of Data Futures to help rationalise data collection across the higher education sector and reduce burden for HE providers. As such we were disappointed by the delay of Data Futures as it means current returns must be adapted to fit the needs of OfS, which relied on the Data Futures programme to undertake their regulatory activity. Rationalisation of data collection across the bodies which require data from providers should remain a priority for Data Futures and IHE recommend that HESA revisit the possibility of continuous collection within the next two years in an effort to find a solution which can further reduce burden in this area. The current plan for collection at three points during the year should not be considered the final position on the Data Futures programme.

44. Graduate Outcomes: open commentary

The Graduate Outcomes Survey is in its inaugural year and we are working closely with the Graduate Outcomes Steering Committee to improve and develop the service to meet the needs of the sector.

We would welcome any feedback that you would like to give regarding our Graduate Outcomes Programme.

Our members have expressed considerable concern on the management of the first cohort of the graduate outcomes survey. Many members report that they did not meet their targets in Cohort A and that they are not currently on target for Cohort B. For those members with very small cohorts,

where there is a risk of not having publishable data unless over 80% of the population is returned, the centralised model of collection presents considerable risk. Our members feel strongly that the survey should implement considerably more contact points during the initial phase and allow providers to contact students to encourage them to complete the online survey.

Our members request greater guidance and support, following the lessons learned activity from Cohort A, to ensure that they can improve the quality of contact data they provide, especially for international students. They are invested in ensuring they can obtain this data to improve the offer they give to both current students and their graduates. While this data may have a regulatory and policy function, it is primarily for use by providers and as such they want to ensure they have a strengthened role in supporting the collection than they were given in Cohort A. IHE would welcome the opportunity to support HESA to ensure a greater return in Cohort B and beyond.

45. As the breadth of support that HESA provides grows it is important to ensure that accurate contact details are held for a wider number of roles within HE providers. We would like to broaden the contact points we have within HE providers to include your Data Protection Officers. This would allow us to communicate more effectively regarding Data Protection issues.

Would you support HESA collecting contact details of your Data Protection Officer?

If you answered yes, please provide contact details below.

Are there any other 'roles' you consider it would be sensible for HESA to collect to make communications and processes more efficient?

n/a