

INDEPENDENT HIGHER EDUCATION

IHE response to the HESA consultation on the
24056 Student record

July 2024

Introduction

IHE welcomes the efforts of HESA to address the feedback raised in the Student record 22056 post-implementation consultation, and their intention to reduce burden for providers.

We are supportive of Proposal 1 – the removal of SessionYear – and welcome the acknowledgment of feedback IHE has previously provided that its purpose and benefits are not clear, and that it has caused challenges for those with non-traditional academic years. We are also supportive of Proposal 4 – the move to only returning cumulating StudentCourseSession entities in the reference period they span – and note that this is a more future-looking approach which will be more appropriate when in-year collection comes into effect. Whilst we acknowledge what Proposal 3 aims to achieve – removing the burden caused by splitting module activity across StudentCourseSessions – we feel that this proposal should go further and remove the requirement to enter module dates. We do not see the purpose or benefits of these and propose, as an alternative, that providers record the amount of credit completed which will be easier for providers, and a clearer way of seeing the number of modules a student has completed over time. We are not in support of Proposal 2 – returning previous StudentCourseSessions – as this is more burdensome than submitting a new SCS. It is also more challenging in instances where students are not dormant for a full year, a common occurrence for IHE members due to more flexible modes of study and multiple cohorts.

A key theme across our response is the need to ensure that proposed changes are future proof and meet the needs of all providers, especially those operating outside of traditional academic years or with flexible provision. Challenges remain with StudentCourseSession for these providers. The implementation of the Lifelong Learning Entitlement (LLE) and expansion of modular delivery will only increase the frequency of complex models of delivery (such as

courses of less than a year and multiple cohorts) and flexible study options for students. HESA should also consider how requirements will change when in-year data collection comes into effect, and plan for this now. Any change to requirements creates burden for providers to implement, requiring training and sometimes changes to systems and processes, and an increase in errors in the first instance. We urge HESA to be forward-looking and critical in its approach to avoid an unnecessary frequency of change that adds to the burden of data submission.

Finally, we note that timelines for change need to take into account the implications for both higher education providers and software providers. Short timelines make it more likely that software will not be able to change quickly enough and enable the implementation of new models of collecting or reporting data. We urge HESA to consider the longest possible timeline for changes which may result in the need for software modifications, considering both large software models and those used by smaller providers.

Proposal 1: Removal of SessionYear

Do you have any concerns or comments on the proposal to remove the SessionYear entity?

Overall, IHE is supportive of the removal of SessionYear. The purpose and value of SessionYear has not been clear to our members and, as we noted in response to HESA's Student record 22056 post-implementation consultation, a number of our members experienced challenges with SessionYear – in particular those with non-traditional academic years, such as accelerated programmes. In these cases, students would often continue for a short period into another SessionYear which would then present errors at various stages of the data submission. Although exceptions were made, this still added to the burden of data submission. The limit on the number of SessionYear codes that could be created also resulted in considerable challenges for those with shorter learning opportunities or running multiple cohorts. It was also more challenging for these members to coordinate between SessionYear and StudentCourseSession as it was not clear what coding they should use and it often led to quality issues later in the process. As LLE comes into effect, and there is an expansion of modular delivery, the number of providers with more complex models of delivery (including programmes of less than a year and multiple cohorts) who experience challenges with Session Year will only increase if it were to remain.

Further guidance will be needed to clarify the additional validation that will be in place at StudentCourseSession level, in particular the requirement that the StudentCourseSession start date should be within 14 days of the anniversary of the previous StudentCourseSession. We would welcome guidance on how this will work in practice, and what will be expected of providers where start dates do not align with this period.

Please describe any impacts, positive or negative, the removal would have.

We do note and caution that any changes to the data model and requirements for providers creates further work. Although we support the removal of SessionYear in this instance, we urge

HESA to be forward-looking and critical in its approach to avoid an unnecessary frequency of change that adds to the burden of data submission.

What would be your preference for returning this information?

Option two: remove SessionYear and add new data fields and validation.

Burden assessment for continuing with the SessionYear entity and current guidance - Set up

4-7: Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.

Burden assessment for continuing with the SessionYear entity and current guidance - Run

4-7: Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.

Burden assessment for removing SessionYear and returning new data fields - Set up

1-3: Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required

Burden assessment for removing SessionYear and returning new data fields - Run

1-3: Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.

This change is proposed for the 2024/25 Student record (24056). Please highlight any concerns you have with this timeline for implementation, taking into account that by this point, two returns will have been submitted with the current SessionYear structure and guidance.

We do note and caution that any changes to the data model and requirements for providers creates further work. We urge HESA to be forward-looking and critical in its approach to avoid an unnecessary frequency of change that adds to the burden of data submission.

Proposal 2: Return of previous StudentCourseSessions

In scenario one (dormancy) what would your preference be for recording this information?

Option one: continue with current guidance to return a new dormant StudentCourseSession

In scenario two (module result), what would your preference be for recording this information? Please select only one item

Not applicable.

Besides the two outlined here, are there any other scenarios where you think the return of a previous StudentCourseSession would be beneficial?

None.

Burden Assessment for allowing a previous StudentCourseSession to be returned again to update certain information - Set up

8-10: Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

Burden Assessment for allowing a previous StudentCourseSession to be returned again to update certain information - Run

8-10: Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

This change is proposed for the 2024/25 Student record (24056). Please highlight any concerns you have with this timeline for implementation, taking into account that by this point, two returns will have been submitted with the current guidance.

This proposal would require changes to software to enable records to be re-opened and re-submitted. The proposed timeline makes it more likely that software will not be able to change quickly enough to accommodate this. We urge HESA to consider the longest possible timeline for changes which may result in the need for software modifications, considering both large software models and those used by smaller providers.

Please provide any contextual information to support your above answers, or any alternative approaches you think should be considered, in relation to the proposal to amend the guidance for returning previous StudentCourseSessions.

IHE members do not support or see the benefit of Proposal 2, as the return of data previously submitted is more challenging and requires more work than submitting a new StudentCourseSession. It is also more challenging where students are not dormant for a full year. This is a common occurrence for many IHE members as their flexible modes of study and programmes running with multiple cohorts make it possible for students to resume their studies part-way through an academic year. As noted in our response to Proposal 1, this will be even more common when LLE is rolled out and there is an increase in modular provision. Clearer guidance is needed in this area.

This proposal also does not address the challenges IHE noted in response to the Student record 22056 post-implementation consultation regarding instances where students do not return after a period of dormancy and instead receive an exit award. This has previously caused errors for providers on StudentCourseSession with no clarity on how to resolve these. Clearer guidance is needed on how to manage these instances. We would welcome the opportunity to discuss further what would be most helpful.

We also note again the need for guidance regarding requirements for SCS start dates to be within 14 days of the anniversary of the previous SCS.

Proposal 3: Update to ModuleInstance dates guidance

What would your preference be for returning ModuleInstance dates?

Option two: allow ModuleInstances to span StudentCourseSessions as outlined in the proposed guidance above and remove the ModuleInstance.CONTINUING field

Burden Assessment for the proposed amendment to the ModuleInstance start and end date guidance - Set up

1-3: Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required

Burden Assessment for the proposed amendment to the ModuleInstance start and end date guidance - Run

1-3: Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.

This change is proposed for the 2024/25 Student record (24056). Please highlight any concerns you have with this timeline for implementation, taking into account that by this point, two returns will have been submitted with the current guidance.

Timelines for change need to consider the implications for both higher education providers and software providers. Short timelines make it more likely that software will not be able to change quickly enough and enable the implementation of new models of collecting or reporting data. We urge HESA to consider the longest possible timeline for changes which may result in the need for software modifications, considering both large software models and those used by smaller providers.

Please provide any contextual information to support your above answers, or any alternative approach you think should be considered, in relation to the proposal to amend the ModuleInstance start and end date guidance.

We agree that the current guidance that ModuleInstance start and end dates must be contained within the associated StudentCourseSession is challenging. It is often the case for our members that module activity spans StudentCourseSessions and this has made identifying and entering start and end dates difficult. Most of the time, the dates entered have not corresponded to the student's activity or any dates they have in their own systems. This has resulted in errors, creating more burden in the submission.

However, we feel that the change here should go further than the proposal – and remove the requirement to enter module dates. We suggest an alternative means of recording students' progress through modules: using the amount of credit completed. We do not see the purpose of entering module dates, or the benefits this brings. The long-term aim of Data Futures for in-year data collection will also make module dates redundant, so it does not make sense to keep

a requirement to enter these in the data model now. Under LLE there will be more instances where modular dates don't fit StudentCourseSessions, greater variation in module size and length, and more flexible models of study which may make entering any dates even more challenging. Recording the amount of credit completed in each StudentCourseSession will be easier for providers, a clearer way of seeing the amount of modules students have completed over time, and a more future-proof solution.

Proposal 4: Guidance on cumulating StudentCourseSession sub-entities

What is your preference for returning the Session Status, OffVenueActivity and ModuleInstance sub entities of StudentCourseSession?

Option two: only return these sub-entities in the reference period(s) that they span.

The purpose of the current guidance is to allow entities previously submitted in error to be removed. Please provide any comments on if you think the ability to do this is necessary.

We do not feel this is necessary.

Burden assessment for the proposal to return these entities only in the reference periods in which they span - Set up

1-3: Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required

Burden assessment for the proposal to return these entities only in the reference periods in which they span - Run

1-3: Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.

This change is proposed for the 2024/25 Student record (24056). Please highlight any concerns you have with this timeline for implementation, taking into account that by this point, two returns will have been submitted with the current guidance.

We support this proposal and note that this is a more future-looking approach which will be more appropriate when in-year collection comes into effect.

Do you have any other comments on the StudentCourseSession and SessionYear proposals?

These proposals do not address all of the challenges that our members experience with the StudentCourseSession entity, which we raised in response to the Student record 22056 post-implementation consultation. Many IHE members offer highly flexible courses, with multiple entry cohorts per year and the opportunity for students to learn for smaller credit models or for shorter periods. Their existing student records systems or processes require them to collect information in a way that is unique to these delivery models, which often means recording data differently than would naturally fit into the StudentCourseSession entity. Several IHE members

share their data systems as part of a global network of providers, which also poses challenges in converting their data to StudentCourseSession.

Do you have any other comments about this consultation?

A key theme in our response is the need to ensure that proposed changes are future proof and meet the needs of all providers - especially those operating outside of traditional academic years or with flexible provision. Challenges remain with StudentCourseSession for these providers. The implementation of LLE and expansion of modular delivery will only increase the frequency of complex models of delivery (such as courses less than a year and multiple cohorts) and flexible study options for students. HESA should also consider how requirements will change when in-year data collection comes into effect, and plan for this now. Any change to requirements creates burden for providers to implement, requiring training and sometimes changes to systems and processes, and an increase in errors in the first instance. We urge HESA to be forward-looking and critical in its approach to avoid an unnecessary frequency of change that adds to the burden of data submission.

Contact IHE

- For more information, or to speak to someone about this consultation response, please email info@ihe.ac.uk
- Visit our website at www.ihe.ac.uk
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