

INDEPENDENT HIGHER EDUCATION

IHE response to the HESA 25056 Student record consultation

April 2025

Guidance on returning previous StudentCourseSessions

Scenario 1 – dormancy – all providers

Scenario 2 – intercalation – all providers

For scenarios 1 and 2 we are presenting three options on how these could be returned

7. Which is your preferred option for returning dormant and intercalating students in these scenarios?

Option 1 – retain current guidance

8. Please provide any contextual information to support your preference, or any alternative approaches you think should be considered, in relation to returning dormant and intercalating students.

Our preferred option at this time is Option 1 as we do not support any further changes for 25056. Any change to requirements creates burden for providers to implement, requiring training and sometimes changes to systems and processes, and increasing the likelihood of errors in the first instance. IHE members are already managing significant change and have been clear that they cannot support further change, even if beneficial, unless and until the burden of in-year data collection is reduced.

We do recognise the need for a solution to the return of students who are dormant, which remains an issue for IHE members. As we have highlighted in response to previous consultations, the data model and StudentCourseSession entity have not been designed to fit flexible provision, such as varying start dates or activity of less than a full year. This will become even more common when LLE comes into effect and there is an expansion of modular delivery.

We feel that Option 3 might be an effective solution, but there is not enough detail in the proposal at this stage for this to be our preferred option. We support HESA pursuing this option, working closely with the sector to consider how it will be implemented and the consequences it will have for the rest of the return. We feel that this should be done after the implementation of in-year data collection.

We are not in support of Option 2. As we set out in our response to the 2024 consultation, returning previous StudentCourseSessions is more burdensome than submitting a new StudentCourseSession. It would require changes to software to enable records to be re-opened and re-submitted – currently this would need to be done manually, which is more work and burden for those submitting the return. We are concerned that software providers could not make these changes in the timeline proposed. We urge HESA, when considering proposals which require such changes, to consult with software providers in the first instance (both large models and those used by smaller providers) to ensure changes can be delivered.

We also note again that the return of a previous StudentCourseSession is more challenging where students are not dormant or do not intercalate 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, or to study at another institution for a single semester or more flexible period of time.

Scenario 3 – Module results – providers in Northern Ireland only

Not answered

Scenario 4 – closing down StudentCourseSessions – all providers

For scenario 4, we propose adding guidance to the StudentCourseSession guidance page for 24056.

11. Please provide any comments on the approach proposed for closing down previous StudentCourseSessions.

IHE members found this difficult to answer due to the more fundamental problems for them with the StudentCourseSession entity - namely the requirement for it to be a full year. The data model has been designed around traditional programmes of study, with student activity taking place between September and June. As we have highlighted previously, many IHE members offer highly flexible courses which do not fit this pattern. Many have multiple entry cohorts per year and the opportunity for students to learn for smaller credit models or for shorter periods. Flexible models will only become more common in the sector with the rollout of the LLE and the expansion of modular study.

We would welcome the opportunity to discuss this further with HESA, including the implications of closing down previous StudentCourseSessions for flexible provision, and explore how the entity could have more variance to reduce the challenges in returning data for programmes of different lengths and flexible patterns of activity.

12. Do you have any other comments on the data collected in the Student record?

We feel that it is important that HESA views every change proposed in the context of plans for in-year data collection and the increased burden of this for providers. IHE members have been very clear that they cannot support further changes to the Student record, even where those might be beneficial, unless and until the burden of in-year collection is reduced. We encourage HESA to consider (and reference) this in any future consultation on the Student record.

We emphasise again that the data model for the Student record is incompatible with flexible provision. The StudentCourseSession entity and the problems with it that we have described in this consultation response is one of the issues. We would welcome the opportunity for further discussion with HESA about this and how future changes to the record could address issues experienced by providers operating outside of traditional academic years and patterns of activity.

13. Do you have any other comments about this consultation?

IHE welcomes HESA's efforts to further consult on proposed changes to the Student record and consider the impact of these changes on providers. We also welcome efforts to address issues experienced in previous collections and reduce errors and burden. We are in support of future changes that will do this.

However, as we have made clear in our response, we cannot support further change at this time. There is already significant change and increased burden with in-year data collection. Any further changes to the Student record should be considered after this, and with due consideration of how to reduce burden.

We also emphasise that further changes to the Student record should consider how the data model can be more compatible with flexible provision, which is growing in prevalence. We would welcome further conversations with HESA about this, and the changes needed beyond the proposals in this consultation.

Contact IHE

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