# INDEPENDENT HIGHER EDUCATION

IHE response to the HESA Staff record consultation

March 2025

**Introduction**

IHE does not support the proposals for an expanded Staff record. We feel strongly that these changes would constitute a significant increase in data burden with no justifiable benefits for providers or the sector as a whole. There is not a clear enough rationale for the mandatory collection of such detailed information across all providers.

We consider some of the proposals to be unnecessary and excessive. The scope of the collection seems to go beyond HESA's core purpose of data collection on behalf of the sector and would therefore not meet the requirements of data protection regulation. Areas of particular concern include proposals to collect data on visa type and dependants, and the collection of detailed information about governors which we feel duplicates data already captured by the OfS.

Including in scope staff not directly employed is also unnecessary and excessive. There is no evidence to say that this data will be useful in the form it is collected for regulation. The breadth of staff that could be collected under the professional services and operational category is significant. An expanded collection would disproportionly impact small institutions like those in the IHE membership who use contacts such as these to source expert staff in student wellbeing, IT, and similar roles.

It has been made clear that a large driver for these proposals is the data needs of UKRI. We cannot support a blanket increase in data collection for their purposes when they only fund a subset of the sector. We propose that if there is additional information they require, they should collect this directly from the providers they fund. The collection should remain optional for all others.

The data burden from these proposals would be disproportionate for small institutions like those in the IHE membership. They do not have the resource, or systems designed in such a way to undertake such an extensive additional data collection for staff. For example, information about staff who are paid hourly, or who are not directly employed by the institution are held in other (often manual) systems. These changes would require investment in new HR systems capable of systematically collecting and storing all of this information – there is no clear benefit to justify this kind of investment.

Small institutions like those in the IHE membership often have just one member of staff responsible for data returns. This means that the additional work and resulting burden would fall to the individuals already responsible for the student return and implementation of the changes brought about by Data Futures. This will not be feasible, especially given the further resource which will be needed to support in-year collection in this same time period.

In our response to the consultation, we have considered each proposal in turn and provided comments based on an assessment of the burden and the implications of implementation for IHE members. We consulted our members and have responded to the questions in a way that reflects the majority. It should be noted that responding individually to this consultation has been challenging for our members as it falls during the new student collection.

In some cases, we have provided suggestions where the burden could be reduced if the proposal were to go ahead. However, overall, we do not support the collection of a Staff return of this nature and urge HESA to reconsider these proposals in full.


## Coverage of the Staff record: Non-academics

### 7. Would you support a change in how we refer to staff without an academic contract, from 'non academic staff' to 'professional, technical and operational staff'?

Yes

### 8. Do you agree with dividing the previous category of non-academic staff into separate categories for technical staff and professional services and operational staff?

Yes

### 9. Do you agree with the proposal definition of technical staff?

Yes

### 10. Are there any categories of technical staff that you believe would be excluded by the proposed definition?

No

### 11. For providers only, please complete your provider's burden assessment for the distinction of technical and professional services staff – set up. For providers only, please complete your provider's burden assessment for the distinction of technical and professional services staff – run.

Set-up: 8-10
Run: 8-10

**12. Please provide any contextual information to support your above answers, or any alternative approaches you think should be considered, in relation to the proposed definition of technical staff and the distinction between technical and professional services.**

For IHE members there is often significant overlap between both technical and academic roles, and technical, operational and professional services roles. This means it would be complex and burdensome for providers to identify and categorise staff in the way that is proposed.

In small and specialist institutions, it is very common for staff to have a range of functions within their roles. Firstly, on technical and professional courses 'technical' staff such as Studio or Lab Managers will often also have teaching responsibilities. It is not currently clear enough from the definition where technical staff would need to be returned as 'academic', and how providers would determine this distinction – for example, based on a proportion of their role or duties.

Similarly, roles often combine 'technical' aspects with other operational or professional services duties. Examples include Studio Assistants or Technicians, a common role in institutions offering practical, lab or studio-based education. These roles have aspects which meet the definition proposed for 'technical' staff but could also have duties including setting up rooms, taking registers, moving or managing equipment, and sometimes staffing student enquiry / information hubs. Similarly, staff who are primarily 'professional', such as those working in digital development or IT roles, may also support students with the use of technical equipment.

Our response to Question 11 identifies a very high burden for both setup and run for this reason: that the categorisation of staff in the way that is proposed would be time intensive and costly. It will require an understanding of every individual's duties, which might only be ascertained by speaking directly to them. This is not feasible, or justifiable in terms of any benefit delivered from doing this. Furthermore, roles and duties change and evolve to meet organisational and student needs, meaning that individuals will need to be continuously categorised and recategorised.

Secondly, we note the additional burden caused by proposals later in the consultation – namely the inclusion of staff not directly employed by the institution. As we set out in our responses to Questions 16-19, there are high volumes of contract and service agreement staff in technical, operational and professional services roles which would make including all of these staff groups more complex and burdensome. IHE members don't currently collect information on these staff members in the systematic way that would be needed for this return. Their inclusion would require investment in HR systems to incorporate this change, and the staff resource to deliver.

We do however note that there is some argument for the division of categories, primarily if it enables a better determination of what information is needed for what members of staff. We would therefore support the division of non-academic staff into categories (as per our response to Question 8) if this then meant that certain groups could be excluded and the burden reduced. For example, excluding from scope professional services and operational staff – noting as we have already that high proportions of these would fall into the 'not directly employed' category. It is indicated in the proposal that the intended benefit of capturing this information is primarily for

technical staff for research purposes. We do not see any clear rationale for including all non-academic staff.

If a division were to be made on this basis, there would need to be clearer definitions, and guidance on a proportion of duties that would enable institutions to categorise a role as technical or academic, with then no requirement to return information about their other duties.

**13. Would you support the mandatory UK-wide reporting of data on non-academic staff?**

No

**14. For providers only, please complete your provider's burden assessment for the inclusion of data on non-academic staff – set up. For providers only, please complete your provider's burden assessment for the inclusion of data on non-academic staff – run.**

Setup 8-10
Run 8-10

**15. 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 reintroduce mandatory UK-wide collection on non-academic staff data.**

We feel that the mandatory collection of data on non-academic staff is unnecessary and excessive and therefore does not comply with data protection regulation. This data would have no internal use and would be collected purely for the purpose of the return. We see no potential use within the OfS framework for this data, with no reference to the existing Staff return in existing regulatory action, let alone this additional information.

It is clear that the primary beneficiary of this data will be UKRI, from whom over half of providers in the Fee Cap category of OfS registration do not access any funding. This proportion will only grow with the expansion of the OfS register in line with the DfE's proposals for franchised provision, and the Lifelong Learning Entitlement (LLE). Therefore we see no justification for a blanket mandatory collection.

The additional data burden would be disproportionate for small and specialist providers, like those in the IHE membership. There are a number of reasons for this:

- Limited resource to complete the return: often there is just one member of staff responsible for statutory data returns, the same individuals with responsibility for the Student Return, who are also carrying the additional workload created by Data Futures and the move towards in-year data collection. Further resource would be needed, and without research funding this would ultimately have to be paid for by student fees.
- HR and data systems have not been designed to collect and store the detailed information proposed for this return. The collection would require investment in systems capable of handling more complex data for which there is no internal purpose or need. There would be no return for this investment.
- High volumes of staff 'not directly employed' and fractional staff within the non-academic category, increasing the complexity and burden of the return.

- Complex structures including being part of a group structure, resulting in shared staff. For example, some IHE members delivering HE programmes are a division of colleges or institutions delivering broader education services and share central professional services functions and staff.

## Coverage of the Staff record: not directly employed by providers

**16. To what extent to do you agree with the proposal to increase the Staff record coverage by certain employment arrangements?**

Strongly disagree

**17. For providers only, do you believe your provider will be affected, i.e. increasing the number of staff being returned, as a result of this proposal to change the coverage by certain employment arrangements?**

Yes

**18. For providers only, please complete your provider's burden assessment score for increasing the coverage by certain employment arrangements – set up. For providers only, please complete your provider's burden assessment score for increasing the coverage by certain employment arrangements – run.**

Setup 8-10
Run 8-10

**19. Please provide any contextual information to support your answers above, or any alternative approaches you think should be considered, in relation to the proposal to increase the Staff record coverage by certain employment arrangements.**

Under each of the categories for non-academic staff, IHE members have high proportions employed under different employment arrangements. Collecting information about all of these staff will be time and resource intensive, and we do not see a clear enough justification for doing so.

In professional services and operations there are high proportions of staff who are employed through other organisations. These arrangements are necessary to meet the needs of the student population for specialist services. There are high volumes of students on courses of two years or less, and the headcount of students requiring specific support changes from year to year. Employing staff flexibly through other organisations is necessary to meet these changing needs. Examples of staff that could be in scope include counselling or mental health professionals, disability support staff, staff providing academic support such as 'study skills' provision, marketing and recruitment staff, or operational staff working on short term development or expansion projects.  We do not see in the proposals any justification for collecting information on these staff groups.

We also note that IHE members often work with the same organisations – so staff could be working indirectly for more than one institution. This increases risk in data quality, with the potential for staff being returned more than once.

Many IHE members also employ high proportions of technical staff through other organisations or on a self-employed / freelance basis. A common example is where industry professionals are brought in to support the delivery of their programmes – through masterclasses, field trips or projects. Collecting the information proposed by HESA for these groups of staff would be challenging and create a significant barrier to working with industry partners. There is a real risk that it would make these partnerships more difficult, ultimately to the detriment of the student learning experience.

The variations in the different employment arrangements in the examples given above can be extensive. As we have noted in our response to earlier questions, the burden of capturing, storing and reporting this information often falls to one or two individuals. In some institutions the nature of employment arrangements is not recorded on central systems. Staff responsible for the return would need to ascertain this information afresh. This would be a significant piece of work, and not something we feel can be justified by the described purposes of this part of the collection.

We reiterate that we cannot see the justification for this requirement across all providers. If UKRI and Research England would benefit from this information, we propose that they collect this from the institutions they fund – and it should remain voluntary for all other institutions.

### 20. Do you support the proposal to collect data on the employment arrangements?

No

### 21. Please provide details of any expected challenges for implementation, suggestions for definitions or comments on the proposal to collect data from staff who are employed by an organisation consolidated into the provider's accounts.

Not answered

### 22. Please provide details of any expected challenges for implementation, suggestions for definitions or comments on the proposal to collect data from staff who are employed by an affiliated organisation.

Further clarity is needed on the definition of an 'affiliated organisation'. There are a number of examples in the IHE membership of arrangements which could fall into scope as an unintended consequence without a clearer definition in line with the intended purposes of this collection. We feel that including these staff would be beyond the purposes of this proposal and would add a significant volume of staff to the collection for little identifiable benefit. Examples include:

- Franchised provision: whether staff at a teaching provider are in scope of the awarding partner's return
- 'Managed campus' models: Some IHE members operationally manage and contract staff for campuses of other registered institutions required to submit the Staff return, so whether these staff would need to be included in the partner institution's submission.
- Services agreements for welfare or academic support staff with third party organisations. See our response to Question 19 which sets out the challenges of collecting information about staff who fall into this category.
- Embedded colleges: Centres / sites offering programmes to prepare for entry into HE could be considered 'affiliated' to either the registered pathway provider or university partner.

- Agreements between institutions whereby a portion of a course is delivered by another provider.

**23. Please provide details of any expected challenges for implementation, suggestions for definitions or comments on the proposal to collect data from staff who are employed by an intermediary organisation.**

Further clarity is required on the definition of an intermediary organisation.

There could also be challenges around obtaining the right to collect and hold this level of detailed data for individuals not directly employed. Data sharing agreements would need to be put in place with intermediary organisations. This could create barriers to working with these organisations which are an important route for institutions to respond in a flexible and timely way to changing resourcing needs.

**24. Please provide details of any expected challenges for implementation, suggestions for definitions or comments on the proposal to collect data from staff who are self-employed or freelance.**

As we have noted in response to Question 19, industry professionals are often engaged on a self-employed and freelance basis to support the delivery of specialist programmes. Collecting detailed information about these individuals risks creating barriers to working with industry partners, which is essential to the student learning experience on these programmes, and would not be in the provider or student interest.

**25. Are you aware of any arrangements that aren't covered in the categories listed in the proposed new field to capture the employment arrangements above? If so, please describe these below.**

Clarity is needed on whether student staff would be included in the collection, and what category they would fall under.

**26. For providers only, please complete your provider's burden assessment score for collecting data on the employment arrangements – set up. For providers only, please complete your provider's burden assessment score for collecting data on the employment arrangements – run**

Set-up: 8-10
Run: 8-10

**27. Please provide any contextual information to support your answers above, or any alternative approaches you think should be considered, in relation to the proposal to collect data on the employment arrangements.**

See our response to Question 19.

## Medical & Dental Clinical Academic Surveys

Not answered

## Staff activities and employment functions

**32. To what extent do you agree with our recommended method of collecting employment function data Option 4 (separate flags describing role and main employment function)?**

Strongly disagree

**33. What would be your preferred method of collecting employment function data?**

Option 1 (enhanced guidance)

**34. If you did not select "Option 4" above, please provide a reason as to why a different option would be preferred**

We strongly disagree with collecting detailed information on employment function. As we have referenced earlier in our response, employees at our member institutions often have multiple functions, and these change according to the skills of the employee and organisational needs. This means that the only way to attempt to collect this information would be to speak to every individual about their duties, and then regularly repeat this exercise. The data captured would be meaningless, and the significant burden of undertaking this exercise would not justifiable.

Some examples to illustrate these points are:

- Teaching staff may also provide technical support or have duties such as managing library services or other facilities.
- Technical staff such as Studio Assistants and Technicians might also undertake administrative duties or provide some student services functions, such as staffing student enquiry points.
- In small institutions there is not always a clear distinction between who is and isn't 'student facing' – senior staff might routinely have these responsibilities (such as the Registrar responding to student queries about learning or assessment, or the COO dealing with escalated issues relating to facilities or resources).
- There are often no clear 'back office' spaces in smaller institutions so HR or IT colleagues might speak to students at an enquiry point.

We have selected Option 1 as our preferred option, as Options 2, 3 and 4 each propose defining and categorising staff roles in a way which would be complex and burdensome for our members.

Much clearer definitions of these employment categories would be needed, with clear guidance on what proportion of a role would determine it to be the 'main employment function'. It is not clear at all from the proposal what 'Practice' as a main employment function constitutes, or what roles fall outside of the list and would need to be classified as 'other employment function'.

**35. For providers only, please complete your provider's burden assessment for Option 2 (additional valid entries for technical and professional services contracts) – set up. For providers only, please complete your provider's burden assessment for Option 2 (additional valid entries for technical and professional services contracts) – run.**

Set-up: 8-10
Run: 8-10

**36 For providers only, please complete your provider's burden assessment for Option 3 (multiple choice, with additional valid entries for technical and professional services contracts) – set up.  For providers only, please complete your provider's burden assessment for Option 3 (multiple choice, with additional valid entries for technical and professional services contracts) – run.**

Set-up: 8-10
Run: 8-10

**37. For providers only, please complete your provider's burden assessment for Option 4 (separate flags describing role and main employment function) – set up. For providers only, please complete your provider's burden assessment for Option 4 (separate flags describing role and main employment function) – run.**

Set-up: 8-10
Run: 8-10

**38. 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 change our approach to collecting data on staff employment functions**

As we have outlined in response to Question 33, Options 2, 3 and 4 would require providers to map every job role and attempt to assess proportions of duties to determine which category would be the best fit. This would be a hugely burdensome exercise, and the data would not be used internally.

As we have highlighted earlier in our response, systems have not been designed to collect and store this level of data about staff functions, so they would need to be built or bought with no clear justification or financial return for this investment.

This exercise could lead to staff being arbitrarily shoehorned into categories which might not accurately reflect their full duties. We do not know how this data will be used and are concerned that it could lead to the misrepresentation of the workforce in our member institutions.


## SOC Codes

**39. Would you be in support of collecting 4-digit SOC data?**

No

**40. For providers only, please complete your provider's burden assessment score for collecting 4 digit SOC code – set up. For providers only, please complete your provider's burden assessment score for collecting 4 digit SOC code – run**

Set-up: 8-10
Run: 8-10

**41. 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 collect 4-digit SOC codes**

The burden assessment score we have given in Question 40 is primarily because our members have not opted in to the return of non-academic staff, and our assessment of the level of burden that would be created through the mandatory inclusion of these staff.

Collecting data on SOC codes is complex and burdensome and has no internal purpose or benefit. Members currently collect 3-digit SOC codes for academic staff purely for the purposes of the return. Collecting 4-digit SOC codes for all staff including non-academic staff would be a significant increase in burden. This is relevant to the issues we have highlighted in relation to categorising staff according to employment function (see our responses to Questions 34 and 38).

We cannot see a justification for providers who are not funded by UKRI to have to return this information.

## Careers in higher education: tracking careers and identifiers

**42. To what extent do you agree with Proposal 1a for improving STAFFID (Ensure that the directory of Staff Identifiers contacts is kept up to date)?**

Agree

**43. To what extent do you agree with Proposal 1b for improving STAFFID (Mandatory inclusion of Staff Identifiers contacts in the Staff Identifiers contacts directory)?**

Agree

**44. To what extent do you agree with Proposal 1c for improving STAFFID (Encourage data protection teams to engage with HESA around concerns about sharing STAFFIDs with new employers)?**

Agree

**45. To what extent do you agree with Proposal 1d for improving STAFFID (Encourage staff ownership of STAFFIDs)?**

Disagree

**46. To what extent do you agree with Proposal 1e for improving STAFFID (Develop a central database of STAFFIDs)?**

Disagree

**47. Do you have any other suggestions for how we can support improvements in STAFFID?**

**48. Do you believe it will be possible to improve STAFFID to the extent that it enables reliable tracking between years?**

No

**49. To what extent do you agree with Proposal 2 (Mandate the collection of ORCID for staff engaged in research)?**

Disagree

***50. For providers only, please complete your provider's burden assessment for Proposal 2 (Mandate the collection of ORCID for staff engaged in research) – set up. For providers only, please complete your provider's burden assessment for Proposal 2 (Mandate the collection of ORCID for staff engaged in research) – run.***

Setup 8-10
Run (not answered)

***51. To what extent do you agree with Proposal 3 (Use hashed NI numbers in a central database of STAFFIDs)?***

Disagree

***52. For providers only, please complete your provider's burden assessment for Proposal 3 (Use hashed National Insurance numbers in a central database of STAFFIDs) – set up. For providers only, please complete your provider's burden assessment for Proposal 3 (Use hashed National Insurance numbers in a central database of STAFFIDs) – run.***

Not answered

***53. To what extent do you agree with Proposal 4 (Introduce names to the Staff record if efforts to improve STAFFID prove unsuccessful)?***

Disagree

***54. For providers only, please complete your provider's burden assessment for Proposal 4 (Introduce names to the Staff record if efforts to improve STAFFID prove unsuccessful) – set up. For providers only, please complete your provider's burden assessment for Proposal 4 (Introduce names to the Staff record if efforts to improve STAFFID prove unsuccessful) – run.***

Setup: 8-10
Run: 8-10

***55. Please provide any contextual information to support your answers above, or any alternative approaches you think should be considered, in relation to the proposals on identifiers in the record.***

We do support, in principle, improving the tracking of staff as we believe that we are underutilising this data as a resource to understand and address the diversity of staff in the sector. We feel that this data could be better used by government and policy makers to address issues in the HE workforce. This includes staff shortages, which is something our members experience.

However, we note that the profile of staff in our member institutions would make these proposals challenging and could lead to inaccurate data and the misrepresentation of the workforce. There is a high prevalence of staff from industry who enter and exit the HE sector inconsistently. This will show in the data as high volumes of temporary staff with short contracts, which could be interpreted negatively – despite this being a pattern and frequency of movement which is understood in context as positive for industry-focused programmes. Because of this, we have

agreed overall with improvements to STAFFID but note that our members do not individually see the value in the long-term tracking of staff in their institutions.

As we have highlighted earlier in our response, we also note the high number of fractional contracts, with staff working for more than one institution. This could result in them having multiple STAFFIDs, creating duplication and quality issues in the data.

Our response to Question 50 reflects that small numbers in our member institutions are engaged in research so the use of ORCID is very low. Our assessment is that the setup burden of mandating this would be high. The burden of running this is unknown.

We disagree with Proposal 3 as we do not see the value that using hashed NI numbers would add to the other proposals to improve the use of STAFFID.

We disagree with Proposal 4 as this could increase burden. Our members have noted that using staff names is problematic as staff can have the same name. In the past, this has led to different staff being allocated the same STAFFID.

## Careers in higher education: Fixed term contracts

**56. To what extent do you agree with collecting data on contract length for staff on fixed-term contracts?**

Disagree

**57. What is your preferred approach to collecting data on contract length for staff on fixed-term contracts?**

Option 1 (expected end date)

**58. For providers only, please complete your provider's burden assessment for Option 1 (expected end date) – set up. For providers only, please complete your provider's burden assessment for Option 1 (expected end date) – run**

Set-up: 8-10
Run: 8-10

**59. For providers only, please complete your provider's burden assessment for Option 2 (contract length field) – set up. For providers only, please complete your provider's burden assessment for Option 2 (contract length field) – run**

Set-up: 8-10
Run: 8-10

**60. To what extent do you agree with the proposal to collect data on open-ended contracts linked to grant funding?**

Neither agree nor disagree

**61. For providers only, please complete your provider's burden assessment for the proposal to collect data on open ended contracts linked to grant funding – set up. For**

***providers only, please complete your provider's burden assessment for the proposal to collect data on open ended contracts linked to grant funding – run***

Not answered

***62. Please provide any contextual information to support your answers above, or any alternative approaches you think should be considered, in relation to the proposals on fixed term contracts.***

Whilst we can support the collection of data on contract length for staff on fixed-term contracts already in scope of the record, we do not support it for the expanded record proposed in this consultation.

The volume of staff that would now be in scope – non-academic and those not directly employed by the provider – would increase significantly, as would the complexity and burden of capturing this information (indicated in our responses to Questions 58 and 59). Contract length is constantly changing, and it is common for staff in these wider categories to move to a different contract for different services within the institution, especially in technical roles or those recruited from industry.

There will also be particular challenges in capturing this information for staff who are employed by affiliated organisations: providers would be required to enquire about the end date for fixed-term contracts, noting too that these can change. This would be burdensome for both parties, and a barrier to working with other organisations to meet resourcing needs in this way. An example which would be particularly problematic is an Invigilator used for exams, who often have fixed-term contracts (for which the end date can change frequently) for a primarily part-time role. We would argue that the value of capturing this information for these types of staff member is negligent at best.

There will be further complexity if staff who are part of managed campuses, embedded colleges or franchised provision are in scope of the record (see our response to Question 22 regarding models which could fall under the category of "affiliated organisation"). It can be common practice for the awarding institution to approve recruitment, but not to determine the contract end date or renewal. In these instances there would be increased burden for both parties, including the creation and management of a data sharing agreement between institutions to enable this information to be returned.

We also note the impact of the Government's new Worker Protection Act. The changes that will come into effect, including right to be given a contract, could lead to high numbers of staff who were previously self-employed or freelance (such as hourly paid teaching staff) now given fixed-term contracts, increasing the volume of staff in scope and as such the resource required to meet these requirements.

We welcome that the proposal to collect data on open-ended contracts is limited to where roles are linked to grant funding.


## Visa status and migration to the UK

***63. Would you be in support of collecting data on visa status in the Staff record?***

No

**64. What is your preferred method of collecting data on the type of visa?**

Option 1 visa flag

*65. For providers only, please complete your provider's burden assessment score for collecting a visa flag (option one) – set up For providers only, please complete your provider's burden assessment score for collecting a visa flag (option one) – run*

Setup 4-7
Run 4-7

*66. For providers only, please complete your provider's burden assessment score for collecting the visa type breakdown (option two) – set up For providers only, please complete your provider's burden assessment score for collecting the visa type breakdown (option two) – run*

Setup: 8-10
Run: 8-10

*67. 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 collect data on visa status.*

We do not agree with the mandatory collection of information about visa status for all staff proposed to be in scope of the Staff record. Whilst providers would be able to provide data on visa status (Option 1) for staff already in the record, we note again that the proposed expansion of the record would make this significantly more challenging and resource intensive. Visa status can change, and this would be incredibly time consuming to manage for the categories of staff proposed for inclusion in the record. Returning information about visa status would also be particularly difficult for staff not directly employed by the institution. We have outlined in our responses to Q16-27 the challenges of obtaining and managing this level of detailed information about these individuals.

Furthermore, irrespective of a provider's ability to capture and provide this information we do not see a justification for its collection. Given that the Home Office already holds this data, we suggest that HESA work more closely with them on the transfer of this data if it is essential to their work. We note that the Government has committed to reducing the burden of regulation. If this information is considered essential for HESA's purposes, mechanisms should be put in place to enable it to be appropriately shared as opposed to duplicating its collection.

We note again that one of the primary beneficiaries of this data would be UKRI and reiterate our call for a solution whereby they collect information from the providers they fund, and not that their requirements become mandatory across the sector.

*68. Would you be in support of collecting data on the duration of a visa?*

No

*69. What is your preferred method of collecting data on the duration of a visa?*

Option 1 duration date field

**70. For providers only, please complete your provider's burden assessment score for collecting a duration date (option one) – set up For providers only, please complete your provider's burden assessment score for collecting a duration date (option one) – run**

Setup: 8-10
Run: 8-10

**71. For providers only, please complete your provider's burden assessment score for collecting duration date ranges (option two) – set up For providers only, please complete your provider's burden assessment score for collecting duration date ranges (option two) – run**

Setup: 8-10
Run: 8-10

**72. For providers only, we would like to understand any difficulties providers might face when looking to include visa status data in the Staff record, so please let us know your concerns below.**

There are a number of changes already being made to the interfaces between provider databases and the new sponsor management system as the Home Office overhauls their digital interactions with sponsors. The timing of this proposal is therefore unhelpful and we would recommend waiting and then collaborating with the Home Office digital team on their roadmap before making any decisions.  See our response to Question 67.

**73. 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 collect data on visa duration**

See our response to Question 67.


## Personal characteristics (for providers in Northern Ireland and Scotland) / Dependents

Not answered


## Dependents

**79. Would you be in support of collecting data on dependants?**

No

**80. For providers only, please complete your provider's burden assessment score for collecting data on dependants – set up For providers only, please complete your provider's burden assessment score for collecting data on dependants – run**

Setup: 8-10
Run: 8-10

### 81. 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 collect data on dependants

We feel strongly that the collection of data on dependants is unnecessary and excessive, and this would not therefore comply with data protection regulation. Further explanation from the DfE is required as to why they need this data from all providers in order to justify its collection. Dependant data is not something providers are required to collect or hold. UKVI do not inform sponsors of any dependant visa applications linked to staff members sponsored. Providers would struggle to collect this data, assure its quality or maintain its accuracy.

## Welsh and Scottish Gaelic speakers (for providers in Wales and Scotland)

Not answered

## Governors

### 84. To what extent to do you agree with the proposal to collect more data on governors in general?

Strongly disagree

### 85. Do you support the proposal to collect data on the types of governor?

No

### 86. For providers only, please complete your provider's burden assessment score for collecting data on the type of governor – set up.  For providers only, please complete your providers burden assessment score for collecting data on the type of governor – run.

Set-up: 8-10
Run: 8-10

### 87. Do you support the proposal to collect data on the role of a governor?

No

### 88. For providers only, please complete your provider's burden assessment score for collecting data on the role of a governor – set up. For providers only, please complete your providers burden assessment score for collecting data on the role of a governor – run.

Setup: 8-10
Run: 8-10

**89. Please provide any contextual information to support your answers above, or any alternative approaches you think should be considered, in relation to the proposal to collect more data on governors.**

We do not agree with the collection of further information on governors as part of the Staff record. The OfS already captures information about Chair/Vice Chair positions, as is deemed necessary for its oversight of governance. We understand that the regulator has an increased interest in information on governance. We urge HESA not to implement changes to the Staff record until it is clear what information the OfS will be collecting and so avoid creating inconsistency and duplication which will increase the burden for providers. We feel strongly that information should be collected once and only once and then shared appropriately if different regulators have need for it.

It would be very difficult for providers to provide this information in the way that is being proposed. The list of types of governors does not capture the wide variety of roles and definitions used across the sector. Not all providers use the CUC code or has a governor / trustee model, for example some institutions have Directors. See IHE's Code of Governance as an example of a different model in the sector. It would therefore not be possible for all providers to complete this section of the return with the information they have. We also note that this information changes regularly, making the data useless.

If HESA decides to progress these proposals, IHE would welcome the opportunity to be further involved to help ensure that any information collected is done so in a way that avoids duplication, reduces burden, and is appropriate for the range of governance models in the sector.


**Understand research sabbaticals and secondments**

Not answered


**Year of implementation**

**100. What is your preferred year of implementation for outcomes of the Staff major record review?**

Beyond the 2027/28 collection

**101. What are your main considerations when selecting your preferred year of implementation?**

Ability to make the required changes in time (system or process etc)

Amount of other changes happening at similar times

**103. Please provide any contextual information to support your answers above, or any alternative approaches you think should be considered, in relation to the implementation year of the Staff major record review.**

The changes proposed would create a significant increase in work and burden for providers. Small institutions do not have the resource or the systems to undertake such an extensive additional data collection where there is no clearly justifiable benefit for doing so. Most IHE members do not have HR systems currently built to manage this range and volume of additional detailed information. For example, information about staff who are paid hourly or who are not directly employed by the institution are held in other systems. Meeting the requirements of this revised return would require investment in new HR systems capable of categorising and managing this data in the way required for the return.

Small institutions like those in the IHE membership often have just one member of staff responsible for data returns. This means that this additional work and burden would fall to the individuals already responsible for the student return and implementation of the changes brought about by Data Futures. In this same time period these small teams need to prepare for the commencement of in-year data collection, which will already require additional work and resource. This means there is no resource to meet any additional requirements for the return of staff data.

### 104. Do you have any other comments on the data collected in the Staff record?

Not answered

### 105. Do you have any other comments about this consultation?

IHE does not support the proposals for an expanded Staff record. We feel strongly that these changes would constitute a significant increase in data burden with no justifiable benefits for providers or the sector as a whole. There is not a clear enough rationale for the mandatory collection of such detailed information across all providers.

We consider some of the proposals to be unnecessary and excessive. The scope of the collection seems to go beyond HESA's core purpose of data collection on behalf of the sector and would therefore not meet the requirements of data protection regulation. Areas of particular concern include proposals to collect data on visa type and dependants, and the collection of detailed information about governors which we feel duplicates data already captured by the OfS.

Including in scope staff not directly employed is also unnecessary and excessive. There is no evidence to say that this data will be useful in the form it is collected for regulation. The breadth of staff that could be collected under the professional services and operational category is significant. An expanded collection would disproportionally impact small institutions like those in the IHE membership who use contacts such as these to source expert staff in student wellbeing, IT, and similar roles.

It has been made clear that a large driver for these proposals is the data needs of UKRI. We cannot support a blanket increase in data collection for their purposes when they only fund a subset of the sector. We propose that if there is additional information they require, they should collect this directly from the providers they fund. The collection should remain optional for all others.

The data burden from these proposals would be disproportionate for small institutions like those in the IHE membership. They do not have the resource, or systems designed in such a way to undertake such an extensive additional data collection for staff. For example, information about

staff who are paid hourly, or who are not directly employed by the institution are held in other (often manual) systems. These changes would require investment in new HR systems capable of systematically collecting and storing all of this information – there is no clear benefit to justify this kind of investment.

Small institutions like those in the IHE membership often have just one member of staff responsible for data returns. This means that the additional work and resulting burden would fall to the individuals already responsible for the student return and implementation of the changes brought about by Data Futures. This will not be feasible, especially given the further resource which will be needed to support in-year collection in this same time period.

In our response to the consultation, we have considered each proposal in turn and provided comments based on an assessment of the burden and the implications of implementation for IHE members. We consulted our members and have responded to the questions in a way that reflects the majority. It should be noted that responding individually to this consultation has been challenging for our members as it falls during the new student collection.

In some cases, we have provided suggestions where the burden could be reduced if the proposal were to go ahead. However, overall, we do not support the collection of a Staff return of this nature and urge HESA to reconsider these proposals in full.

**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

- Connect with us on LinkedIn at @Independent Higher Education