

# INDEPENDENT HIGHER EDUCATION

IHE response to the HESA consultation on in-year data collection: FTE

April 2026

***Do you support the outlined proposal for collecting FTE data in-year?***

Yes.

***Please provide any contextual information to support your answers above.***

Overall, we support the proposed approach to collecting predicted and actual FTE for the annual reference period (RP0) as we recognise the benefits of establishing a UK-wide, consistent methodology. However, there are several areas where the practical implementation of the proposal may introduce unnecessary burden or ambiguity, particularly for providers with flexible or non-traditional delivery models, and we would welcome refinement of the proposal.

A key concern relates to the proposal to require two separate FTE fields (predicted and actual). The system already identifies when a StudentCourseSession has ended (via SCSENDDATE), meaning that the distinction between predicted and actual FTE could be inferred without duplicating fields. The introduction of a second FTE field is therefore viewed as avoidable additional burden, with a risk of inadvertent double reporting of the same activity.

There is a risk that predicted and actual FTE may not always behave as intended within the proposed validation framework, particularly for providers with irregular or non-traditional programme structures. For courses where students frequently span multiple reference periods, legitimate fluctuations in FTE - most notably where students complete early or mid-period - are already prone to being incorrectly flagged by existing validation checks. Flexible validation tolerances, clear recognition of non-traditional study patterns, and the inclusion of worked

examples illustrating how the model should operate for multi-period or pathway-based delivery would be helpful.

In relation to burden, we anticipate a moderate setup burden for the majority of our members, reflecting the need for system changes, revised internal processes, and updates to validation rules. The ongoing burden is expected to be low, provided that systems can reliably infer predicted versus actual status without requiring manual intervention.

Providers with simpler delivery structures anticipate fewer challenges, while those with more complex or highly flexible provision expect proportionally greater operational impact. We urge HESA to ensure stable timelines, early release of schemas and validation rules, and a commitment to minimising late-cycle changes to minimise the set up and ongoing burden.

The clarity, stability and timing of forthcoming guidance will be critical to successful implementation and reduced burden. Many smaller and independent providers operate outside traditional academic patterns, and we would like to see worked examples of different course structures, including illustrations of overlapping StudentCourseSessions and multi-period delivery models. The usability of the model will depend on the clarity of the final guidance, which should include detailed, worked scenarios illustrating how the approach should operate for irregular or flexible patterns of study.

Overall, while supportive of the direction of travel, IHE Members strongly encourage HESA to refine the proposal to reduce duplication, and provide early, practical guidance that reflects diverse delivery structures and supports consistent application across the sector.

***Please rank the options in order of preference:***

1. Proposed option: Return a predicted and actual FTE for RP0 by StudentCourseSession
2. Option 3: Record predictive and actual FTE by StudentCourseSession
3. Option 1b: Return a predicted and actual FTE for RP0 by Engagement
4. Option 2: Return actual FTE by reference period – Least preferred due to burden and complexity

***Do you have any comments on the alternative options or any additional approaches you think should be considered, in relation to the proposal to collect FTE data in-year?***

We support the proposed option as the most balanced and proportionate approach, particularly in its aim to establish a consistent UK-wide model while avoiding unnecessary complexity. The alternative options risk introducing additional burden without delivering clear benefits, especially for providers with diverse or non-standard delivery structures.

As already noted, the requirement to submit separate predicted and actual FTE fields is a key area of concern for IHE Members. This duplication could be avoided by inferring the required status from existing fields, such as SCSENDDATE. Removing the dual-field requirement would reduce burden, minimise the risk of double-reporting, and provide a clearer and more intuitive model for providers using a wide range of student record systems.

Alternative options adding additional data fields, reference-period splits, or historic adjustments would create disproportionate workload (especially for smaller providers) and run counter to the stated aim of reducing burden across the sector.

Overall, while acknowledging the rationale behind the alternative options presented, IHE Members consider the proposed option to be the most workable and proportionate, provided that refinements are made to reduce duplication, ensure adequate flexibility, and support consistent implementation across the sector.

***Are there any other examples you would like to be reflected in the guidance?***

We would like to see clear, practical worked examples that reflect the full diversity of provider delivery models in the guidance. Many small and specialist independent providers operate outside traditional academic structures, and illustrative scenarios are essential to ensure consistent interpretation of the proposed FTE approach across the sector.

We recommend the inclusion of examples covering short, irregular and flexible courses, as well as provision that does not follow modular patterns. These examples would help clarify how predicted FTE should evolve across reference periods and how transitions should be managed when StudentCourseSessions end earlier than expected.

Providers also highlighted specific areas where additional guidance would be particularly valuable, including:

- Scenarios involving overlapping StudentCourseSessions, where students are enrolled on more than one activity during the same period.
- Examples for providers whose students enter or leave across multiple reference periods, which is common in pathway-based or rolling enrolment models.
- Case studies for pathway providers, where student progression and timing often differ from standard higher education structures.
- Explicit illustrations showing when predicted FTE should be updated, particularly where a student's study pattern changes mid-period.

Detailed, representative examples will materially improve sector-wide understanding and will help ensure that the proposed model operates fairly and effectively for providers with flexible and non-traditional patterns of study.

## Contact IHE

- For more information, or to speak to someone about this consultation response, please email [info@ihe.ac.uk](mailto:info@ihe.ac.uk)
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