

INDEPENDENT HIGHER EDUCATION

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

April 2026

Do you support the proposal to create a new StudentCourseSessionCostCentre entity to replace the existing ModuleCostCentre entity?

Yes.

What is your preference for implementation timescales?

2028/29 collections (28156/28056).

In your current system set up, at what level is Cost Centre information held?

We are responding on behalf of IHE Members and their approaches vary. Some members hold cost centre information at Module level only, whilst others hold it at both module and programme (or StudentCourseSession) level. It is also important to note that IHE Members did not previously submit cost centre information under the Student Alternative Return. As a result, these data requirements are relatively new and are still being developed and embedded across the sector.

If this is held at a Module level, please provide feedback on the effort involved in aggregating this to StudentCourseSession level to return.

For providers that hold cost centre data solely at Module level, IHE Members report that aggregation to the StudentCourseSession level would require a significant amount of work. Our

members anticipate the need to develop new mapping logic to accommodate cases where students take multiple modules with different cost centre allocations. The impact would be particularly significant for specialist and industry-focused providers, such as those offering games design, sound and audio engineering, or sport programmes, where individual modules often span multiple specialist subject areas with materially different cost centres. In these contexts, aggregating Module level cost centre data to a single StudentCourseSession level risks being both technically complex and conceptually challenging, requiring subjective assumptions that may reduce data accuracy.

Alongside this, providers would need to update internal reporting structures and validation processes to ensure new data is accurate and consistent. The impact would be greatest where systems are bespoke or processes are more manual, as changes are typically more difficult and resource-intensive to implement.

While aggregation is feasible in principle, the effort required ranges from moderate to high for providers without established system support. For some, manual mapping may remain necessary.

Nonetheless, IHE Members recognise that the proposed move away from Module level dependency has longer-term benefits, as long as the requirements are clearly explained and remain stable over time.

Please provide any contextual information to support your answers above.

Many small and specialist providers operate with limited digital and technical capacity, meaning that even relatively modest system changes can create disproportionately high workload and resource pressures. These impacts are particularly acute for specialist and industry-focused providers, where complex delivery models involve several different cost centres. Such providers are more affected by changes that require new assumptions or additional data-mapping work.

These pressures are further compounded for institutions currently undertaking student record system migrations, where timelines, data models and technical capabilities are still evolving. In these circumstances, uncertainty about future system configuration can make it difficult for providers to assess capacity or plan confidently for the implementation of new requirements.

The proposed implementation of cost centre data changes from the 2028/29 year, aligned with the introduction of changes to FTE data, is therefore welcomed. Implementing these changes concurrently would allow cost-centre derivations to be updated once, reducing duplication of effort. A 2028/29 start date would also be preferable to ensure that LLE-related changes and the expansion of modular delivery are sufficiently embedded beforehand.

Providers emphasise that the success of the proposed approach depends heavily on guidance that is stable, unambiguous and consistent across regulators. Early clarity, alignment between HESA and OfS definitions and expectations, realistic and predictable timelines, and stability in requirements once decisions are made are all seen as essential to enabling proportionate and effective implementation.

Please provide any comments on the alternative options or any other approaches you think should be considered, in relation to collection of cost centre data. Comments on the precision of cost centre FTE calculations required from your provider's perspective would be welcome.

IHE Members agreed that the preferred option is the only viable one. The alternative options were seen as problematic because they either reintroduce burdens this proposal aims to remove or rely heavily on ModuleInstance dates, which are widely regarded as unmanageable and disproportionately complex for many providers. Options that would require providers to keep Module level dates purely to support FTE calculations were viewed as unworkable, given longstanding challenges with aligning these dates to internal systems and the limited operational value they provide.

Providers noted that approaches involving reduced precision may appear attractive from a burden-reduction perspective but risk generating data that is insufficiently reliable for regulatory or analytical use. While IHE Members recognise the importance of maintaining an appropriate level of precision in cost centre FTE calculations, they emphasise that this must be balanced against practicality. Any method requiring extensive assumptions, or reintroducing dependencies on granular Module level structures, is unlikely to be feasible or proportionate for small and specialist providers.

Contact IHE

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