

INDEPENDENT HIGHER EDUCATION

IHE response to the HESA consultation on in-year data collection: Reference periods and related factors

March 2026

A. Understanding & Awareness

Q7. How clear is the definition of a “reference period” as used in this consultation?

Somewhat clear.

Q8. How clear is the definition of a “cumulative collection” as used in this consultation?

Somewhat clear.

Q9. Is there any further information you’d like to see as part of these definitions, or further examples that would help understanding?

The definitions are somewhat clear, but clarity could be improved through worked examples that reflect provider diversity, particularly for providers with non-standard academic calendars. Although the underlying principle is simple — that is providers return all students active within the defined dates — the practical application becomes more complex for providers whose academic structures do not follow the traditional August–July cycle or a single annual intake.

Examples are especially valuable where programmes begin outside the traditional cycle or run across different academic years. Providers would welcome explicit illustrations showing how data should accumulate across RP1 → RP2 → RP0 for patterns such as January starts, April starts, multiple cohort intakes, short courses, and accelerated degrees that operate continuously without natural breaks.

As well as examples helping to avoid confusion for colleagues who have complex delivery patterns, it would also strengthen confidence that their specific structures have been recognised and accounted for within the in-year model.

For these reasons, IHE recommends that HESA include clear, practical worked examples covering:

- January–January programmes
- Multiple intakes (e.g. January, April, October)
- Accelerated programmes without built-in break periods
- Short courses running over single reference periods
- Short courses running over two academic years (e.g. April-September)
- 15-month programmes that extend beyond a second reference period

Inclusion of these examples would materially improve sector-wide understanding and support consistent implementation across a diverse and growing part of the higher education landscape.

B. Reference period timing options (RP1 & RP2)

Q10. Which reference period 1 end date do you prefer?

Option B: 15 November.

Q11. What is your rationale for this RP1 preference?

A later RP1 end date would be favourable, as this provides essential additional time during an already busy period of the academic year. Data processing at the start of the academic year is routinely workload-heavy and highly pressured, particularly for small and specialist providers where the same individual or a very small team is responsible for multiple statutory returns – and on occasion, other areas of work. A later deadline therefore offers a more realistic and manageable window in which to complete RP1 accurately.

A mid-November end point aligns more closely with the NSS population deadline, which may support improvements to in population accuracy by reducing unnecessary duplication of effort and minimising discrepancies caused by different reference dates. However, it is not clear whether this alignment would benefit all delivery patterns equally, particularly for those with January, April or multiple intakes, where students may not be active during the NSS reference period. Clarification would be welcomed on whether such alignment is genuinely intended and operationally beneficial for non-standard delivery models.

A later RP1 deadline also helps avoid clashes with ILR deadlines, which fall in the first working week of each month. At the same time, there are concerns that any RP1 date in November risks overlapping with the HESA staff return, as the deadline usually falls around the same time. The

HESA staff return is undergoing substantial changes (with implementation expected in 2027/28 and 2028/29) and it is expected that the changes will increase administrative burden (as was referenced in the major record review consultation outcome). Many IHE Members have a single member of staff who is responsible for both the staff return and student returns; avoiding overlapping deadlines is therefore essential.

Further to this, the subsequent mid-December RP1 sign-off period would clash directly with the HESES deadline. We would support the eventual removal of duplicate data in HESES and for RP1 to become the primary source of OfS funding population data in the future; this could meaningfully reduce burden and resolve longstanding scheduling conflicts.

Overall, IHE Members consider the later RP1 end date to be the option that best supports data quality and operational feasibility, while acknowledging the risk of deadline clashes.

Q12. Which reference period 2 end date do you prefer?

Option B: 10 February.

Q13. What is your rationale for this RP2 preference?

IHE Members generally favour a later RP2 end date, as this better reflects the operational realities of the January–February period. For many providers, particularly those with January intakes, early February coincides with intensive activity associated with welcome, enrolment, timetabling adjustments, and initial student support interventions. A later deadline therefore offers a more realistic window in which to capture accurate and complete data for new starters.

A later RP2 deadline also helps to avoid clashes with other statutory deadlines, including ILR submissions and Student Loans Company course information returns. These overlapping requirements place disproportionate pressure on small and specialist providers, where the same individual or small team is often responsible for multiple data returns.

In addition, a slightly later RP2 end point supports the integrity of the cumulative model by allowing sufficient time for early-term changes (e.g. enrolment corrections, late confirmations, and initial withdrawals) to be fully reflected before data is compiled for onward use. Providers emphasise that this adjustment would not introduce delay but would instead improve accuracy by ensuring that RP2 reflects a more stable picture of early-year activity.

Taken together, we consider the later RP2 end date to be the option that most effectively balances data quality, operational feasibility, and the realistic sequencing of statutory deadlines across the sector.

C. Reference Period 0 (Annual Collection)

Q14. To what extent do you agree with the proposal to move the reference period 0 sign-off date?

Disagree.

Q15. What changes would help make reference period 0 sign-off by 1 October achievable?

IHE Members recognise the intention behind bringing forward the RP0 sign-off date, but emphasise that substantial changes would be required for a 1 October deadline to be feasible. Early October is already one of the highest-pressure periods for data collection in the academic calendar, with providers simultaneously managing enrolment, summary data from re-sits and summer exams, and timetabling adjustments. At small and specialist providers these activities are often handled by the same individual or very small team also responsible for statutory data submissions, creating significant capacity constraints.

A key concern for members is the timing of progression, resit and award boards, many of which for July-term students take place in September or early October. In these cases, final award outcomes may not be confirmed in time for an early RP0 sign-off, creating a material risk of incomplete data. This is particularly the case for accelerated degrees or courses with multiple or non-traditional start dates.

In addition, RP0 would continue to overlap with several other statutory returns, including the HESA staff record, ILR submissions and RP1, which fall in the same window and are again managed by the same staff. The concentration of activity multiplies burden and limits flexibility which narrows capacity to deal with unforeseen events. This risks the quality and timeliness of the data return.

Feasibility also depends heavily on the nature of the RP0 submission. If RP0 simply consolidates the information previously submitted in RP1 and RP2, providers consider an earlier sign-off more achievable. However, if new or additional data is expected at RP0, the burden increases and the deadline becomes unrealistic for many members. IHE Members therefore request clear confirmation of whether RP0 is intended as a cumulative roll-up or a larger, expanded return.

To support any earlier deadline, HESA would also need to commit to freezing validation rules that are not subject to late revisions and releasing schemas considerably earlier in the cycle. IHE Members report that changes or late-released updates - even after nominal rule-freeze points - create uncertainty and delay internal processes. If HESA expects providers to bring work forward, members believe HESA's own internal timelines must shift forward proportionately.

To support an earlier RP0 deadline, providers emphasise the importance of having autonomy in how they meet deadlines, rather than being required to follow prescriptive milestones. While milestones can be useful as guidance, they should operate on an opt-in basis, allowing providers to adopt them where they add value. Frequent changes to milestones or associated requirements create additional administrative burden and undermine providers' ability to plan effectively across the cycle.

D. Two-week coverage rule options

Q16. Which coverage option do you prefer?

Option 3: Include based on expected activity but update during quality assurance period.

Q17. What is your rationale for this preference?

Option 3 aligns most accurately and reflects the operational reality; that is, students can be enrolled but removed later if necessary. While providers always aim to record withdrawals promptly, it is often not possible to confirm within the first two weeks whether a student has genuinely withdrawn, as engagement checks, retention interventions, or external validation processes may delay confirmation. As a result, definitive information may only become available after the RP1 submission point.

Option 3 allows providers to return students based on the most accurate information available at the time and then update records during the quality assurance period once the student's actual engagement is known. Early leaver numbers are typically very small, making post-submission adjustments manageable and proportionate.

By contrast, Option 1 risks under-reporting, and Option 2 risks over-reporting if providers cannot easily remove students later. There is then the risk of creating unintended indicators, such as non-continuation flags, if corrections are missed.

For these reasons, we favour Option 3 and suggest that a tolerance mechanism, similar to existing quality-rule overrides, would support accurate updates without unnecessary regulatory burden.

Q18. Do you have concerns about alignment with other areas (e.g. mode/distance learning rules, population derivations)?

No.

Q19. Should students who started less than two weeks before the reference period end date be include in derived populations (e.g. entrants, standard registration)?

Undecided / unsure.

It is preferable to include students who start within two weeks of the reference period end date in the relevant derived populations. Excluding these students risks systematic under-reporting, whereas inclusion allows any necessary adjustments to be made later within the cumulative model. The impact is likely to be very small, given the low numbers of students who leave within the first two weeks.

However, the overall validity of the population ultimately depends on how the RP1 and RP2 data will be used. Until the intended uses are clarified, it is difficult to assess the potential impact and risk of over- or under-reporting.

E. Graduate Outcomes and the Qualifiers population

Q20. To help us put your responses in context, do you know roughly how many students currently fall into the RSNENGEND = 98 at sign off, and do you anticipate this increasing under the earlier collection schedule?

As we are responding on behalf of the IHE membership as a whole, we cannot provide a numerical estimate. However, we do anticipate that the number of students recorded as RSNENGEND = 98 is likely to increase if the RP0 sign-off point is earlier. Some IHE Members hold exam boards and award committees in late summer, and these schedules are shaped by academic calendars, PSRB requirements, staffing availability, and external validation or partnership arrangements so they cannot easily be moved. As a result, we would anticipate that an earlier RP0 deadline would mean a greater proportion of students whose award outcomes are not yet confirmed at the point of sign-off.

Q21. Do you have any feedback on the recommended solution to minimise the impact on the Graduate Outcomes / qualifiers population in-year?

HESA's proposal to use RP1 of the following year to "top up" RP0 with late-confirmed awards is a pragmatic way of ensuring late-confirmed awards are not missed from the Graduate Outcomes/qualifiers population. This would help accommodate outcomes that are finalised after early autumn exam boards, including late appeals, resits, or corrections, and would reduce the risk of omitting legitimate qualifiers from the population.

However, the effectiveness of this solution will depend on clear operational guidance, including how students whose awards are confirmed after RP0 should be coded, and whether late qualifications data will be returned in RP1 or RP2, and whether manual adjustments to RP0 will therefore be necessary. There is also a need to ensure that systems can manage the transfer of late awards into the subsequent reference period without creating technical burden.

Overall, the recommended "top-up" model is workable, provided it is supported by clear instructions and sufficient system readiness across the sector.

Q22. Do you have any feedback on the discounted options to minimise the impact on the Graduate Outcomes / qualifiers population in-year, if you have considered these?

We understand the rationale for discounting several of the proposed options and broadly agree with these assessments. Options that rely on including students with unknown awards risk over-surveying individuals who may ultimately be ineligible, which could undermine data quality and create a poor survey experience.

Similarly, approaches that depend on historic amendments would increase operational burden, require providers to work across multiple collections simultaneously, and may be unmanageable for institutions without systems designed to support historic amendment workflows. This also introduces additional authorisation requirements for statutory customers.

IHE therefore supports discounting these options and reiterates that any viable solution must balance timeliness with operational feasibility. IHE Members remain supportive of the preferred approach (supplementing RP0 with RP1 of the following year), provided it is underpinned by clear guidance and manageable system expectations.

F. Historic amendment considerations

Q23. Do you have any feedback on the recommended solution for historic amendment in-year?

The proposed approach to historic amendments for RP1 and RP2 is unclear and unnecessarily burdensome; in a cumulative model, RP1 and RP2 are effectively superseded by subsequent collections, raising questions about why tight correction rules are needed when RP0 will become the final, authoritative record.

The recommended solution also appears to contradict the aim of reducing burden, as providers would need to:

- detect errors quickly within a “short timeframe”
- demonstrate that they are “exceptional” and
- secure regulator sign-off.

We request clearer justification for what kinds of errors genuinely require immediate correction at RP1 or RP2 – as opposed to waiting to be corrected in the subsequent collection – and how these data will be used in-year. Until the intended uses are understood, it is difficult to judge the necessity or proportionality of such strict historic amendment requirements.

Q24. Do you have any feedback on the discounted options for historic amendment in-year, if you have considered these?

An alternative approach to consider would be to allow corrections in subsequent reference periods rather than requiring a short, exceptional-use correction window. This would be more practical and better aligned with the cumulative in-year model. Under this approach, errors identified after RP1 could be corrected in RP2 or RP0, supported by quality-rule flags to track changes over time, as is already common practice within existing issue-management systems.

This model would reduce unnecessary burden, avoid duplicative work, and reflect the fact that interim collections are superseded by later submissions. It would also ensure that RP0 remains the final, authoritative record, without imposing unreasonable expectations on providers during already congested periods in the academic cycle.

G. Operational Feasibility & Support Needs

Q25. What additional guidance, tools or support would best help you deliver in-year data?

Clear, practical guidance, including worked examples that cover non-standard study patterns such as January or April starts, multiple cohorts, accelerated programmes, and other atypical structures would help providers to deliver in-year data. These examples would help providers understand how such patterns map across RP1, RP2 and RP0.

We would also recommend making schemas, validation rules and system tools (including full functionality of HDP and OVT) available as early as possible in the cycle, and with minimal

subsequent change, so that providers can test data flows and confirm system readiness. Frequent updates to rules or milestones create additional burden and disrupt planning.

Overall, timely and stable documentation, early availability of validation tools, and guidance that recognises provider diversity are considered essential to support successful in-year implementation.

Q26. Are there risks or barriers your institution faces in adopting in-year collection?

A significant risk to adopting in-year collection is the inability to meet deadlines due to the concentration of multiple statutory returns during the autumn. For many IHE Members, RP0, the staff return, RP1 and HESES are all completed by the same individual or very small team, creating substantial capacity pressures. This risk is intensified by the timing of the major staff record review, which is expected to increase the complexity and workload of staff data submissions. In addition, providers will necessarily be preparing RP0 and RP1 in parallel, managing two schemas simultaneously at one of the busiest points in the academic year. Autumn is already a peak operational period, particularly for smaller institutions whose data staff are also heavily involved in enrolment and induction activities. These overlapping demands heighten the risk of missed deadlines and errors. We encourage HESA to consider the impact of all statutory data collections - not just the in-year student data return - when assessing feasibility and designing timelines.

We also have concerns around system readiness. Providers use a wide range of student record systems - from major platforms to smaller systems and bespoke in-house tools - and many system suppliers have not yet demonstrated how their products will accommodate overlapping schemas and cumulative submissions across two academic years. This also presents challenges for providers who rely on manual upload tools or less mainstream systems. Given these variations, we strongly encourage HESA to ensure that end-to-end testing includes a representative range of systems, not only the large commercial platforms, so that the practical impact on all parts of the sector is fully understood. The IHE representative has requested to the In-Year Data Programme Board that IHE Members participate in end-to-end testing to ensure that the diversity of systems used by IHE Members are considered and risks are managed.

H. Final Comments

Q27. Do you have any other comments about this consultation?

IHE Members welcome the opportunity to contribute to the development of the in-year collection model and we want to emphasise the importance of ensuring that the needs and operating contexts of non-traditional models, and small and specialist providers are fully considered throughout implementation.

As noted elsewhere in this response, members remain concerned about the cumulative impact of overlapping and sometimes conflicting regulatory and data-collection requirements. We strongly encourage HESA and statutory partners to undertake a holistic mapping of deadlines across the sector to minimise overall burden. Overlapping requirements place disproportionate

pressure on small and specialist providers, where a single individual or very small team is often responsible for multiple statutory data returns.

We expect the in-year model to be more burdensome for those relying on manual uploads, as they are less able to automate or streamline submissions. It is therefore essential that the design and sequencing of the in-year collection takes full account of the diversity of provider size, systems capability and delivery models to ensure that the new approach is both fair and genuinely manageable across the sector.

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](https://www.linkedin.com/company/independent-higher-education)