

INDEPENDENT HIGHER EDUCATION

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

April 2026

Do you support the proposal to create a new EngagementStatus entity to replace the existing SessionStatus entity?

Yes.

Please provide any contextual information to support your answers above.

Overall, IHE Members are broadly supportive of the proposal to move status data from the StudentCourseSession level to the Engagement level, recognising the logic of aligning status more closely with genuine student activity rather than the technical structure of course sessions. This represents a sensible structural change, particularly in the context of in-year collection, modular provision and increasingly flexible delivery models. The current SessionStatus model can require providers to return or recreate StudentCourseSession records purely in order to record changes in status, even where no real activity has taken place, and this issue is likely to become more pronounced under an in-year collection model.

We welcome the principle that 'Active' would be the default position and would not require explicit reporting where engagement continues uninterrupted. Provided it is clearly communicated as a point-in-time reporting convention rather than a definitive statement of engagement, this approach better reflects real-world delivery and should reduce circumstances in which students appear active in the data solely because providers are required to construct or resubmit technical records. This is particularly relevant for providers with modular, flexible or non-standard provision.

However, 'active by default' does not eliminate the underlying risk of students being recorded as active where providers are not yet aware that engagement has ceased. In practice, there is often a delay between a student disengaging and a formal break in study being approved, and institutions return status data based on the best information available at the point of submission rather than a complete or definitive picture of engagement. This limitation will apply regardless of whether status is recorded at Session or Engagement level.

As a result, it is important that in-year EngagementStatus data is clearly understood by those interpreting and using in-year data as a point-in-time view, subject to later correction and refinement as fuller information becomes available. Without this shared understanding, there is a risk that apparent activity in in-year data could be misinterpreted by external users as confirmed engagement, rather than as a pragmatic reporting assumption. We would therefore welcome clarity from HESA on how EngagementStatus data is intended to be used in-year, including how time-lag, backdating and subsequent revisions are expected to operate within validation and quality processes. Clear articulation of these principles will be essential to avoid misunderstanding or inappropriate use of the data, particularly by external users.

In terms of burden, members generally expect the change to have no or minimal impact for providers in business-as-usual operation, as it represents a change in where status data is recorded rather than a change in what is being recorded. The most significant burden is anticipated at the point of implementation, particularly for system suppliers. Supplier readiness and resourcing are a key risk to successful delivery, especially for small and independent providers who rely heavily on third-party systems or manual processes for data returns. Early and stable technical specifications, realistic lead-in time, and opportunities for testing will be important in mitigating this risk.

We would welcome guidance on how multiple periods of dormancy within a single Engagement would be expected to be represented in practice under in-year reporting. Providers with short, flexible, rolling or modular delivery patterns may legitimately record several changes in engagement status over time, and clarity is needed on expectations around the volume of historical EngagementStatus records to be retained and resubmitted within and across reporting years.

Overall, while members support the direction of travel and see clear merit in the proposed structural change, the success of the approach will depend heavily on clear, practical and stable guidance; transparent framing of what status data can and cannot represent in-year; and sufficient lead-in time for system suppliers to implement changes consistently across the sector.

Please provide any alternative approaches you think should be considered, in relation to collection of status data.

IHE Members do not propose an alternative model that would be preferable to recording status at Engagement level. We agree that the realistic options are limited to locating status data either at StudentCourseSession level or Engagement level, and that, in the context of in-year collection, modular provision and the Lifelong Learning Entitlement, the Engagement-level approach is the more sensible and workable of the two.

IHE Members consider the proposed Engagement-level model to be appropriate, provided that it is accompanied by:

- Clear and stable guidance that supports consistent interpretation and proportionate implementation. In particular, clarity will be essential on how EngagementStatus data is intended to be used for regulatory, analytical and population-derivation purposes, especially in-year, and acknowledgement of time-lag and backdating as inherent features of dormancy data, rather than treating these instances as exceptions.
- Comprehensive, practical worked examples that reflect non-traditional delivery patterns, including short courses, rolling intakes (including where students move cohorts due to breaks in study, or repeating modules), modular provision, multiple periods of dormancy within a single Engagement, and cases where dormancy spans academic or reporting periods. Such examples would materially improve understanding and reduce the risk of inconsistent practice across the sector.
- Alignment of expectations across HESA, OfS and other statutory uses of the data, to avoid unintended consequences where providers are penalised for revisions that reflect improved information rather than data quality failings.

Members did not support moving status data to the student level, as this would create significant ambiguity for students with multiple simultaneous or overlapping Engagements and would risk obscuring meaningful differences in activity across programmes.

Contact IHE

- For more information, or to speak to someone about this consultation response, please email info@ihe.ac.uk
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