

INDEPENDENT HIGHER EDUCATION

IHE response to the HESA post implementation consultation on the Student record 22056

February 2024

Introduction

1-6)

IHE contact details submitted.

Data Specification

Session year / Student course session

7) What did you find most difficult about the SessionYear and StudentCourseSession entities? Please give specific details about the problem(s) you faced.

IHE members faced a number of structural challenges in the 2022/23 student return, and these influenced their experiences across the return, including in SessionYear and StudentCourseSession.

Members felt strongly that the entities did not clearly map to the fields they used to represent the same information in student alternative, and that presented challenges when setting up SessionYear and ensuring both fields had usage consistent with guidance throughout the return. The guidance did not demonstrate a clear use for the entities including who would use the data from a statutory purpose, and for what purpose, which made it more difficult to match the field to the data providers held. Members found it challenging to create a workable model

for SessionYear, and there were limited examples that most members found unhelpful. Some reported sending possible models to HESA in advance of submission and then finding errors and having to completely change their SessionYear model in the final stages of the submission process.

SessionYear was also more difficult for providers with non-traditional academic years, and those who offered accelerated summer programmes as students would often continue for a short period into another SessionYear which would then present errors at various stages of the data submission. Exceptions were made for some of these issues but members would prefer if the system were flexible enough to allow reporting of students in SessionYear without exceptions and workarounds as these add considerably to the burden of data submission.

Several IHE members reported that HESA had a limit on the number of SessionYear codes that could be created, which caused considerable challenges for those running multiple cohorts and greater challenges for providers who have shorter learning opportunities for students such as courses that are 3, 6, or 9 months. Submission was finally achieved by a number of "workarounds" but this cannot persist if the HESA model is going to support more innovative and modular learning in future.

Members with multiple cohorts found coordinating between SessionYear and StudentCourseSession most difficult as it was not clear what coding they should use and the coding choices often led to quality issues later down the process. IHE encourages HESA to consider specific examples for providers with multiple cohorts (more than 2) to help anticipate challenges which may arise from different fields or in the quality process and may corrections early.

StudentCourseSession did not map well to the types of courses offered by IHE members. Many IHE members offer highly flexible courses, with multiple entry cohorts per year and the opportunity for students to learn for smaller credit models or for shorter periods. Their existing student records systems or processes require them to collect information in a way unique to these delivery models, which often means recording data differently than would naturally fit into the StudentCourseSession entity. Several IHE members share their data systems as part of a global network of providers, which also posed challenges in converting their data to StudentCourseSession as it was not a natural fit to the entity.

There were also challenges for students repeating all or part of a course, as it was not clear in the StudentCourseSession guidance how to record these instances.

Members noted specific problems with StudentCourseSession when students were receiving an exit award from dormancy. Errors flagged on StudentCourseSession but the actual issue was with the dormancy entity. StudentCourseSession errors seemed to be a catch-all but at no point were providers told the issue was in fact with another field. Members ask HESA to ensure errors indicate clearly the field or fields that could be involved, and where lessons can be learned from errors this year, that they be assigned more appropriately in the next return to allow a more efficient quality process.

IHE would welcome the opportunity to support a discussion between HESA and members specifically to find a more permanent solution for both the issue of flexible courses and the challenge of SessionYear with many different models of delivery.

8) What would you like us to do or change, in order to improve or fix the problem(s) you faced?

IHE members would welcome the following specific actions to support a more efficient and less burdensome collection in the next academic year:

- Provide specific examples, working closely with IHE members, of how to best manage SessionYear and StudentCourseSession where providers have multiple cohorts and courses which are less than an academic year.
- Provide more guidance for students repeating years.
- Provide a map for the role of SessionYear across the return. Members have asked for better guidance on the role SessionYear plays further in the data to better understand how to code establish these codes at the start of the process, unique to their provision.
- Work with IHE to consider how SessionYear and StudentCourseSession could be altered to better accommodate shorter periods of study (e.g. 3, 6, 9 months).

9) Please provide any contextual information to support your answers above.

No comment.

Cost centres for postgraduate research students

10) If the option was available, would you submit data on cost centres for postgraduate research students at your provider?

No, I would not optionally submit cost centre data for PGR students.

11) Please provide any contextual information to support your answer above.

As most of IHE members do not have access to any research funding and have limited postgraduate research students, they did not see value in this data entity.

Students studying for QTS - providers in England only

12) What is your preference for returning the age ranges that ITT students qualify in?

No comment.

13) What is your preference for returning the age ranges that ITT students are studying for?

No comment.

14) Please provide any contextual information to support your answers above.

No comment.

Tariff data from UCAS

15) Would you agree that we should be considering this improvement to the data quality, even though that may change some submission data on these fields?

Yes.

16) Are there things you would like us to consider when we look to make this change?

The main challenge with tariff points within the data submission is that there is a lack of guidance to understand the grade combinations, especially where providers are admitting students from overseas, or with non-traditional qualifications such as those required for specific arts or technology Degrees. IHE members report having to use Google or very old documentation from UCAS to get lists of what the different tariff grades mean, so they could map their non-traditional qualifications to these. Clear guidance on the final list will be the most important and we would encourage HESA and UCAS to work with all parts of the sector to ensure the proposed definitions work for everyone. This creates significant burden in the process, especially for the many IHE members who recruit students directly, and not through UCAS.

17) Please provide any contextual information to support your answers above.

No comment.

Coverage statements

18) What are your preferences for coverage statements like the StudentFinancialSupport entity and child fields, where data is only returned where it is applicable? (please select all that apply)

I didn't have a problem returning this in 22056, so keep as is.

19) What are your preferences for coverage statements like the FundingAndMonitoring entity and child fields where a hierarchy is imposed? (please select all that apply)

I didn't have a problem returning this in 22056, so keep as is.

20) Do you have any comments or clarification on the preferences given above?

Most IHE members have limited data to offer to these fields given their small size. They felt the development of the guidance was too late to reduce the burden of submitting these entities and they appreciated the support Liaison provided to ensure they were entering the right information. Given their small size, the financial contributions are often very small and often returned quality errors simply due to size, it would be helpful to adjust these.

21) Are there any other coverage statements that you find confusing, or would like Jisc to take another look at for next year?

Several members raised concerns the apprenticeship coverage statement and would like this reviewed as it returned numerous quality issues that were very difficult to resolve.

22) Please provide any contextual information to support your answers above.

No comment.

Returning data outside of the coverage

23) What areas of the data model would you like us to explore allowing returns outside of the coverage statements? For example, dormant students or the StudentCourseSession entity.

IHE members strongly supported allowing dormant students to be returned outside of the coverage statements as this makes it much easier when awarding an exit qualification to these students, when they decide not to return.

IHE members have a number of different regulatory contexts to collect and return data, and the HESA model has recently changed. This has created considerable challenges in changing software specifications, and in altering data to ensure only that which HESA is requesting, is returned. Most members have bespoke student data systems or systems which are part of their wider global entity and the changes HESA have brought have resulted in them having to manually strip data from the return at considerable resource cost. IHE members ask students for this data and make clear that it will be passed to regulators and specific professional bodies, so feel there is no GDPR concern if most fields are returned with data that may not be specifically covered in the coverage statements.

The most significant example of this is information required to meet professional bodies data requests or required by partners and we would encourage HESA to consider both these points in the provider forum or other opportunities to engage directly with providers.

24) Please provide any contextual information to support your answers above.

No comment.

Placement data

25) What level of placement data did you return in 2022/23? (this is only to help us understand if the guidance put you off returning more than the required coverage)

- Some optional placements (other types of placement).
- Some optional placements (shorter lengths of placement).

26) What guidance did you find the most useful when preparing your data return?

No comment.

27) What area(s) of guidance would you like to see improved for next year? Please be specific in terms of the types of placement or the types of guidance you would like to see.

IHE members did not find the guidance on placements sufficient to return these entities successfully. Our members have high volumes of placements and are often required to meet the conditions of professional bodies that may not conform to the mainstream models of professional accreditation.

Members report considerable errors early in the process, and then these were resolved with little to no intervention, so it is not clear what guidance needs to be changed.

28) Please provide any contextual information to support your answers above.

No comment.

Personal characteristics review

29) How did you find implementing the personal characteristics and equality data consultation outcomes?

As IHE members switched from the Student Alternative, to the Student return for the 2022/23 collection, they did not have the same experience implementing the consultation outcomes. They did, however, note some improvements in that transition, in particular the expansion of disability to allow providers to identify when the student had more than one disability.

Members noted that there were unexplained differences in what characteristics were collected for international students compared to UK students. For example Religion was collected for international students and for UK students but disability was collected just for UK students. While we understand there are funding implications to this example it is not clear if this is the reason why it is not collected for international students. Without a clear justification it can be

difficult to justify the collection to students as 'personal characteristics and equality data' would be expected to be collected equally from all students.

30) Please provide any contextual information to support your answer above.

No comment.

Reduced returns

31) What is your preference for identifying the fewer data items that need to be returned for some students?

Identify through a reduced return flag(s).

32) Please provide any contextual information to support your answer above.

IHE members strongly supported the re-introduction of the reduced return concept to the Student record. Many members using manual entry felt this model would significantly reduce the data burden for these students. The reduced return flag was noted by data staff as particularly helpful, in identifying where data did not need to be returned, and boosting morale during a stressful period. They noted that the 2021/22 guidance was particularly clear and practical and recommended replicating it in future collections.

HESA Data Platform

General accessibility across the HDP

33) What areas of assistance do you need from our system, for either yourself or other staff members at your organisation?

- Better keyboard navigation.
- Better labels and instructions.

34) Please provide any contextual information to support your answer above.

Keyboard navigation was broadly noted as positive however IHE member would welcome the creation of a 'back button' allowing them to return to a previous screen. Labels and instructions focused on tolerances were specifically referenced by members, however the overall feedback is that these should be reviewed with a focus on fields which are new for 2022/23 or which may have changed between the student and student alternative submissions, which most IHE members returned previously.

35) What pain points have you experienced during the managing and submitting submissions stages?

Although IHE is aware there is now a download function embedded into the HESA system, the delay in embedding this to the data return process negatively affected our members. The lack of download availability meant that the number of staff at individual members able to work on their provider's return was limited and created unnecessary delays.

36) What pain points have you experienced during the managing and submitting submissions stages?

The majority of our members reported that their greatest frustrations resulted from what appeared to be continuous changes to the quality rules. This meant that when our members felt they had completed their returns, after initial checks showed no quality issues, they then found they had new issues when the quality rules changed. Our members stressed to us that the frequency of quality rule changes caused the data return to feel unmanageable and significantly increased burden. The lack of clarity throughout the quality issues process, including inconsistency in guidance for quality issues, created a working environment for staff submitting the data return which eroded their confidence through no fault of their own.

A further pain point was how providers were to manage tolerances. It was not clear in the managing and submitting stages where providers could manage their own tolerances. This is discussed further in the consultation.

37)

No comment.

38)

No comment.

Quality assurance process

39) Focusing on the information provided in the quality rule report, on a scale of 1-5, does the report give you enough information to be able to resolve your errors, where 1 is not very much information and 5 is lots of information?

2 – some information.

40) What issues have you had with the information displayed in the quality rule report?

Our members noted that it wasn't clear why some quality flags were based solely percentages rather than number of students/records. Members would prefer if quality flags could be removed if the number of records didn't change.

Members were often frustrated when the information displayed in the quality rule report covered only one entity where in fact the error was often related to a completely different entity. A common example given was where the error was StudentCourseSession but in fact the quality issue was with the dormancy entity. This prevented our members from resubmitting their data as they were unclear which field caused the error, and the guidance offered no suggestion on where to look.

IHE would welcome known error reports being communicated to members quicker and more clearly. During the 2022/23 return, many of our members spent time fixing data errors only to later find out these were caused by known issues with the system and not an error in the data.

Members also felt that it was unclear in the quality errors process whether errors were being responded to by HESA, or where the provider needed further work to resolve the error. This made it difficult for data staff to identify who was responsible for next steps in the process and delayed final submissions.

41) Focusing on the systems, on a scale of 1-5, how easy did you find the tolerance change process in the Issue Management System, where 1 is very easy and 5 is very difficult?

4 – difficult.

42) In your view, are there any improvements that could be made to the tolerance change process?

IHE members would welcome further discussion with HESA on the use of percentage in tolerances, and exploring how the current tolerance process impacts smaller providers. Many providers reported “workarounds” by the HESA team to manage the process and we would like to explore how these could become integrated to improve efficiency for all involved.

Several members noted a lack of consistency in the approaches taken to tolerances, and in particular that this changed frequently over the course of the return. Where it is more appropriate to have different tolerances, members would welcome this clearly identified in the guidance to allow them to feel more confident in the process.

Members consistently noted specific challenges for providers with small populations of students. Tolerances are set for larger datasets, and this creates increased burdens on staff, where they are told by Liaison to request different tolerances than the guidance suggests. Consequently, we would welcome allowances in tolerances that take into account a provider’s size and shape.

Members also raised concerns over bugs within the tolerance process that doubled the number of data errors. One member raised these concerns five times during the process but felt they didn’t receive adequate guidance to address the errors.

43) Please provide any contextual information to support your answers above.

Some of our members experienced communication about the Issue Management System that

was convoluted. Members informed us that they received guidance at the beginning of the return process, only to be told something different when inquiring during the middle of the return process. In part this appeared to be due to communication between OfS and HESA about the allowances for tolerances that had no conclusive response. This left members unable to proceed with their returns and tolerance processes in a sufficiently timely manner. The lack of agreement on the return parameters in advance of the process caused unnecessary delays and burden on providers.

HDP: Credibility reports

44) Which credibility reports would you like to see included?

45) Please provide any contextual information to support your answers above.

IHE would like to see credibility reports remain in the data return process as more of our members will make use of them as they grow in size and change in shape. However, we feel more guidance is needed from HESA to enable our members to best use of these reports in return process.

Several members who used credibility reports in previous returns did so to compare data returns with previous years for consistency purposes. Given the considerable changes in this years' return, these reports were not suitable for this purpose but may be again in future.

HDP: Additional collection reports

46) Tell us about your usage of the additional collection reports? (who looks at these reports within your provider, how do they access them, and which reports do you focus on?)

Our members largely utilise additional collection reports for the Graduate Outcomes survey and NSS.

47) Do these reports give you all the information you need during your submission?

The use of collection reports is heavily dependent on the size and shape of the data submitted by the provider. Those who have or are looking to make use of additional collection reports do not feel that there is sufficient guidance to support their usage.

48) Can you identify all the populations that go into each report, and do you know where to find this, especially where you are recreating our figures with your own data?

The guidance does not enable IHE members to identify all the populations in each report and many find it challenging to recreate HESA figures with their own data. Members with flexible delivery models and multiple cohorts found it most challenging to recreate the data, and this may be an area to explore further guidance in.

49) Please provide any contextual information to support your answers above.

No comment.

Closing feedback

50) Would you be interested in taking part in this further development work with Jisc?

No response.

51) Please provide the email address of the interested parties.

No response.

52) Do you have any other comments or feedback about the Student 2022/23 collection?

All our members struggled with the frequent short notice from HESA staff before the platform went down. IHE understands the need to update the system, however our members require advanced notice of these periods as many data staff in our members work part time, or have limited hours to complete the return.

We are aware the move from the Student Alternative collection to Student brought many new fields in this data return. However, our members wish to have further clarification as to why these additional fields are being collected and how they are different from fields that appear similar later on in the collection. Our members struggled to understand how to represent their non-traditional delivery models within entities as well as it wasn't sufficiently clear why these entities were being collected, and what the differences were between very similar entities. For example, members were very uncertain about the differences between Module start and ends dates versus CourseSession fields.

IHE expressed concern early in the process that information required to update systems was not being given to software companies, or providers who had bespoke systems, far enough in advance to make changes to support the return process. This led to delays in returns, and some members abandoned their return through their software and reverted to the manual entry tool as changes simply could not be made in time.

53) Do you have any comments about this post-implementation consultation?

IHE members would like to see HESA re-visit many of these issues again following future returns. The questions of additional data, the use of credibility and collection reports, and preferences for the location of information were difficult to answer as providers were really challenged to simply provide data which met the quality threshold this year. Members noted that they may notice more and have time to make use of specific tools in a year where the goalposts for the return weren't changing so frequently.

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
- Follow us on Twitter at [@independent_HE](https://twitter.com/independent_HE)