



Department for Business, Innovation & Skills

Applying Student Number Controls to Alternative Providers with Designated Courses. Response form

There is no obligation to use this form when responding, but doing so will make your responses easier to analyse. There is no obligation to answer all questions. We look further to receiving your feedback.

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is **23 January 2013**

Please return completed forms to:

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Question 1

Name of organisation (or name of person if the response is a personal response and is not submitted on behalf of an organisation)?

What type of organisation is it? (e.g. Alternative Provider, HEI, FEC, Regulatory Body etc.)

- Name of organisation (or name of person if the response is a personal response and is not submitted on behalf of an organisation)?
HESA
- What type of organisation is it? (e.g. Alternative Provider, HEI, FEC, Regulatory Body etc.)
Sector Agency

Question 2

Do you have a preference for Method 1 (control based on eligible students) or Method 2 (control based on students accessing funding)? If so, why is this?

Method 1 would provide a better basis for decision making and accountability, underpinned by public information. A method is required that avoids a crude allocation of student numbers, particularly if it results in stifling growth and diversity, duplication of courses (one designated for support and one not) with a detrimental impact on students.

Method 2 might allow for more rapid introduction and short term control while a more sophisticated and planned method was being put in place.

Question 3

What is your view on submission of data to HESA? Do you think designated courses at alternative providers should participate in the Key Information Set and therefore complete the National Student Survey and Destination of Leavers in Higher Education survey (if student numbers are large enough to permit this)?

With reference to the consultation question 3 as asked – it might be helpful to appreciate that there are perhaps two questions being asked along the lines of:

- i) What is your view on submission of data to HESA? Do you think there is a need and a value in data being submitted in this way for use by students and the public and by HEFCE if an approach outlined in Method 1 is adopted, or - whether Method 1 or 2 - for an understanding of student numbers and characteristics monitoring?
- ii) Do you agree that contributing to the UNISTATS/KIS website should be a requirement for designated courses, in order for prospective students to make informed choices? Is there a value anyway in the NSS and the DLHE surveys being completed by UK and EU full-time undergraduates, when the number attending AP courses are meaningful?

It will therefore be interesting to try and interpret the response to the question posed, whilst appreciating that many APs are not familiar with HESA. At the consultation meeting a number of participants came up to say they are interested in the KIS, they would like to know more about HESA and they were not sure about how they would

answer the question. It was also clear that a need for shared consistent information was widely appreciated as being essential and there was some recognition of the fact that this would require some effort on their part. Seeking the best approach to AP engagement with HESA is not to assume that there is no opportunity to make some changes to current practice. It is important to recognise that there are likely to be changes in the data collection methodology and approaches in the light of the Information Landscape work. The subscription profiles and funding of HESA may alter to reflect changes in the sector. I would recommend we continue a direct dialogue during your analysis and response to this consultation to ensure that HESA can assist with this recognised need for reliable data.

I appreciate the opportunity to be involved in the process so far.
Many thanks
Alison Allden

HESA RESPONSE TO Q3

Need for information and data

Submission of data to the Higher Education Statistics Agency (HESA)*

*HESA is the official agency for the collection, analysis and dissemination of quantitative information about higher education, see <http://www.hesa.ac.uk/content/view/4/54/>

There are a number of reasons why submission of data to HESA should be undertaken, including:

- To provide information in the student interest
- To support student number control
- To provide baseline information about the HE student population studying at APs

In the light of repeated exercises (e.g. HESA 2011, BIS 2012/13) to gather reliable information about the students undertaking HE at APs, the on-going and systematic collection of data from APs has to be an essential feature of any new regulatory framework. Following this consultation it is **recommended work is commissioned to identify the extent of data required in the short to medium term by those with statutory and regulatory interests, other agencies and key stakeholders including the HE AP providers and their students.**

HESA could lead on such an exercise, using the approach undertaken for HESA record reviews (this could be initiated under the auspices of RPG or BIS). It could address:

- Benefit and Purpose
- Burden and Proportionality
- Access to data
- Sharing and Linking
- Compliance e.g. DPA

Currently HESA provides the mechanism for consistent and professional data collection and dissemination. There are clear advantages of HESA undertaking the collection of AP data, whether for SNC, the KIS or for other requirements.

- 1) The data would be to standards already in use in the HE sector and therefore could be linked and shared separately or in conjunction with HE data already collected.
- 2) HESA has the infrastructure – for example to manage DPA, statistical analysis and

support for those supplying data – that would make this approach both reliable and efficient.

- 3) If data are collected from APs by HESA there is the option of changing the data scope in the future if opted for by an AP or required for monitoring or regulatory purposes.
- 4) HESA has a support, training and helpdesk service which is much appreciated by current subscribers and could be available for APs.

Further:

- HESA data collection regime will also avoid the risk of duplicate requests by various regulatory or statutory bodies and as the Information Landscape project develops, these data collections will fall into the proposed governance structure to the benefit of the APs and those wishing to access and use the data.
- It may be that for a number of APs an individual level student return would not be necessary, in which case HESA can provide a light weight data collection mechanism that would ensure data at any level could be consistently aggregated and therefore allow HE provision to be seen as a whole as well as in its constituent parts. The cost of such a light weight approach would clearly be minimal or could be funded appropriately to prevent any cost to the APs.
- HESA has a Customer Liaison, training and support service that can work with APs to ensure the technical and information management regime required for reporting data to HESA is understood and to introduce best practice to achieve an efficient and effective route to data provision.

The purpose and options for providing data are described below in more detail.

Information for Students

- For those that are members of the QAA there is a requirement to provide public information and an expectation that information to assist prospective student choice is provided through the UNISTATS web site <http://unistats.direct.gov.uk/> which includes for each course a Key Information Set (KIS). The KIS gives a wide range of useful and consistent information to prospective students in the UK and internationally. It can also provide a marketing and benchmarking tool for providers. Any higher education provider/AP can opt to contribute to the UNISTATS/KIS information that is published annually in September.
- UNISTATS and the dataset that supports it are available as an open data source of information about what HE opportunities are available to prospective students.
- In order to provide the full KIS it is necessary for information to be provided from the National Student Survey (NSS) which students respond to before they leave their course. The results are a measure of satisfaction and opinion about their studies and experience. Participating in the NSS not only provides prospective students with comparative information but also can be a useful benchmarking tool for providers. The NSS is run through HEFCE as a chargeable service and the data is then included in the KIS.
- The full KIS also provides information about the employment and salary level of students once they have finished their course. This is acquired from the Destination of Leavers from Higher Education (DLHE) survey run through HESA. It is appreciated

that many students will look for evidence of good employment prospects when choosing where to study. Participation in the DLHE would allow APs to indicate their students' success in achieving graduate employment.

- To participate in both the NSS and DLHE, student details have to be provided to HESA within their student record collection.
- However, for some APs (those with a small number of students on any designated course) the full KIS may not be appropriate as it requires the collection and reporting of individual level student based data, for example the HESA Destination of Leavers or National Student Satisfaction Survey. In these cases a "course data only" KIS can be returned (using a simple collection process) so that the course can appear on the UNISTATS web site. There is a lesser charge for returning the course data only KIS to HESA.
- Such a course only data KIS might also be provided initially by APs while in transition towards providing a full KIS in the future.

Student Number Control and the monitoring of the APs' HE Student population

- With regards to Student Number Control the HESA student record would provide a way of monitoring student numbers for Student Number Control under **Method 1**: setting a number control on all eligible students (i.e. UK and EU full-time undergraduates).
- The HESA student record can be used to collect data about students on designated courses – based on the relevant student subset i.e. UK and EU full-time undergraduates. In addition there would be the preferable option of returning more extensive student populations to allow for a full record of how many students were registered in any institution at any HE level and whether FT or PT.
- The HESA student record can be used to collect information about the entry qualifications and grades of students, which HEFCE could use to set and monitor the student number control limits. Through the entry qualifications data it is possible to benefit from the high grades policy which would enable unrestricted numbers of high grade students (ABB+ in academic year 2013/14).
- **Method 2**: setting a number control for eligible (i.e. UK and EU full-time undergraduate) students on designated courses who access loans and/or grant funding from the Student Loans Company (SLC), would not preclude providers submitting student data to HESA.
- For **Method 1** a survey return to HEFCE is proposed in the Consultation document, however it is suggested that the data required is returned to HESA (providing onward use to HEFCE) – using an appropriate vehicle (e.g. survey format) to allow consistent reporting and the potential for seamless integration or progression to a full student record as required. If the student data collection is undertaken by HESA this data is then available for reporting together with data collected from all providers across the HE sector.
- This would give much greater levels of information about students at alternative

providers and would underpin their participation in the UNISTATS/KIS website.

- The data would be provided for monitoring purposes or for regulatory and statutory purposes to HEFCE and BIS.
- Data submitted to HESA can increase the profile of any provider and can be made available online through the HESA website www.hesa.ac.uk and HESA's information services. For public information purposes such data, for example to show graduate employment outcomes, may be published in popular student guides or league tables.

Opportunities for fuller Student Monitoring and Tracking

- The HESA student record can also collect information on, for example, a student's background (such as the main equal opportunities classifications), their course and pattern of study in the year. It is possible to link individual students in the HESA student return to other data sources, such as the National Pupil Database and the Individualised Learner Record submitted by Further Education Colleges. Such individual data might then be available, for example, to support social mobility and may also help to support requirements under TIER4. However in all circumstances the Data Protection Act would need to be fully complied with.

HESA Subscription

- Higher education providers are currently required to subscribe to HESA to submit data and it is therefore necessary, for example, for APs who will be returning data for UNISTATS/KIS to likewise become subscribers to HESA.
- Fuller data can be submitted, if of interest, to the extent provided by traditional higher education institutions, with benefits such as benchmarking and analysis of trend data and combining with local business intelligence systems. For example the full HESA student record can also be used for data about international, post graduate and part-time students if required.
- The annual subscription rate varies depending on partial or full data submission. It is based on an institutional fixed fee and a student per capita rate which is variable depending on which data streams the providers contribute to.
- The HESA student return demands adherence to certain standards, and submitting data to HESA is likely to require an export facility and adoption of standards that may impact on local data management systems. There will be a need for some investment in this managed process and in the quality of data returns.
- For the smallest providers if outside the SNC, a lightweight collection of student numbers might be appropriate. This might be through a survey methodology which would place minimal demand on APs with very small numbers of students. The profile of courses and the student body would suggest the most appropriate approach to data collection.
- The major student data stream is collected at the end of the relevant academic year, which

means in the first instance there is no data available to inform the setting of student number controls in 2013/14, although within a year it could be used for retrospective monitoring. At the earliest, APs could submit 2013/14 data to HESA in autumn 2014, which HEFCE could use to assess student number control limits for academic year 2015/16; although it should be noted there are a number of APs that we expect to return student data, for the purposes of the KIS, in Sept 2013. HESA can supply further details.

Question 4

Are there any other methods for controlling student numbers on designated courses at alternative providers that you would recommend instead of Method 1 or Method 2?

Further work should be undertaken to develop Method 1. The range of different courses, their funding and the variety of corporate forms undertaking HE provision across the whole sector, suggest further consideration of the detail of the SNC methodology adopted.

Question 5

Do you agree that there should be an exemption from student number controls for alternative providers with small numbers of students accessing student support? If so, do you have suggestions as to how the Department should define 'very small'?

While formal SNC might not be necessary on a designated course where only 5 or less students are eligible for seeking student finance, this might change on an annual basis, including the number of students who actually seek a loan as a proportion of those attending the course and the number of designated courses in any AP.

Student number controls are concerned currently with FT/UG UK and EU students, who may just be a small proportion of the total number of students undertaking HE at any one AP, where one or more courses are designated. The size, profile and student interest may not be represented by the SNC numbers involved.

It is therefore **recommended an annual record of the total HE student population and HE courses should be collected in order to manage any exemption policy for SNC purposes.**

Question 6

Equality considerations: Do you think that the proposals for applying student number controls will have any equality implications (e.g. positive, negative, or neutral) for people with protected characteristics (as set out in the Equality Act 2010), or people from low income groups?¹ What impacts might there be and do you have any evidence of possible impacts?

¹ Section 149(1) of the Equality Act 2010 imposes a duty on Ministers to have due regard to three specified equality matters when exercising their functions. These are: a) eliminating discrimination, harassment,

Any comprehensive collection of student data by HESA, with careful regard for data protection, could include information that would allow, at either aggregated level or individual level, monitoring of any equality considerations that might result from SNC for designation of courses within the context of the complete provision of HE.

Question 7

Do you have any other comments on the proposals within this consultation document?

The current requirement for public data from APs who are members of QAA as well as the collection of data for other purposes e.g. SNC, should be kept in mind.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below:

Please acknowledge this reply

x ☐

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

x ☐ Yes

☐ No

victimisation and any other conduct that is prohibited by the Act; b) advancing equality of opportunity between people who share a relevant protected characteristic and people who do not share it; and c) fostering good relations between people who share a relevant protected characteristic and people who do not share it. The Equality Duty covers the following protected characteristics: age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation. The duty to have due regard to the need to eliminate discrimination also covers marriage and civil partnerships.

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