

HESA CONSULTATION

HESA



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1. OVERVIEW

The purpose of this consultation is to seek the views of our subscribers and others across the higher education (HE) sector regarding the UK-wide services offered by HESA, and the impacts of becoming the designated data body (DDB) in England on our UK-wide service. HESA will use the output of this consultation to inform decisions about what services it offers, and what fees it charges, in future.

We will use the outcomes of this consultation to determine our overall service offering and subscription model, within which will be:

- **a statutory subscription** which covers the costs of providing the right level of services to help HE providers discharge their responsibility to deliver statutory data to the right level of quality;
- **a non-statutory subscription** (this name could change) that covers non-statutory activities. These activities are for HE providers to subscribe to on a voluntary basis.

The subscription model will apply from August 2019.

1.1 WHY ARE WE CONSULTING?

HESA is one of the UK HE sector agencies. Our ‘co-owned’ and charitable status is fundamental to our identity. This survey is your opportunity, as a stakeholder in HESA, to influence the way in which HESA shapes its future services. It is important because we need to ensure that we are offering the right mix of data collection, dissemination and support services to help you meet your regulatory or statutory requirements.

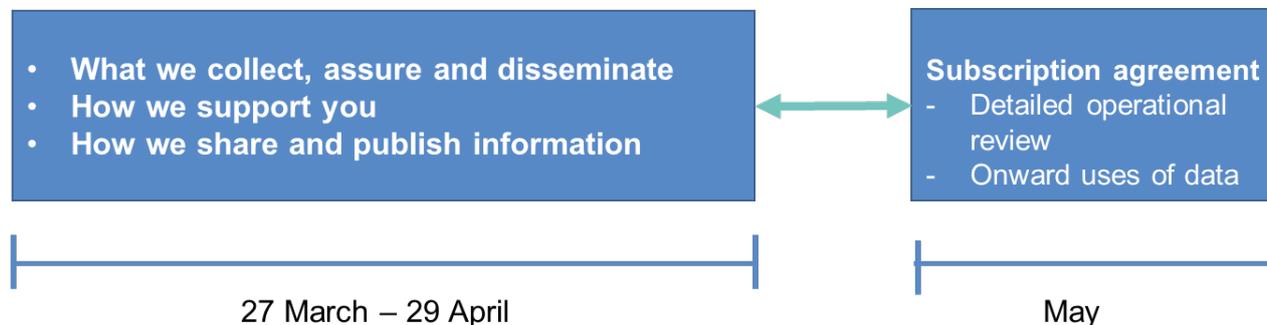
The Higher Education and Research Act 2017 (HERA) created the Office for Students (OfS), together with a new regulatory framework for higher education in England. This structure includes the role of a DDB for England, to which HESA has been appointed.

Becoming the DDB means that many of our activities and collections form part of a statutory and regulatory obligation for English HE providers (and continue to be a statutory requirement across Wales, Scotland and Northern Ireland). This consultation is designed to perform two main functions:

- articulate and share with our subscribers, at a high level, what the statutory elements of our service are; and
- determine how we shape the overall HESA service offering to ensure ongoing delivery of the right services, and to ensure that we maintain a UK-wide picture of the HE sector.

As HERA has been the impetus for this activity, the specific link between HERA and various requirements has been identified throughout the consultation. However, this does not suggest that it is considered in any way as being more important than the requirements of the other nations within the UK or any other statutory requirements.

1.2 STRUCTURE OF THE CONSULTATION



This consultation is the first stage of a wider series of engagements with the HE sector. It will run for four weeks, with the opportunity to respond online being available until 29 April 2019.

Following analysis of responses made to this consultation, we will develop a proposed subscription model and produce the new HESA subscription agreements which will need to be in place for 1 August 2019.

In May, we will provide further information on the form of the new subscription agreement giving you an opportunity to respond to proposals during a two-week period.

To enable you to respond in an effective manner to the questions posed, supplementary and contextual information has been provided for you. In addition, an overview of the questions being asked is included in the next section.

For ease of understanding and navigation, we have grouped the HESA provision into three categories:

- what we collect, assure and disseminate;
 - looking at the data required
- how we support you;
 - detailing the activities or services we deliver in order to support you in meeting your regulatory/statutory data requirements; and
- how we share and publish information
 - covering our dissemination of data and onward sharing activity

For each of these categories, we will begin by describing and explaining what we anticipate the statutory requirements and therefore compulsory activities, will be.

We will then describe and explain what we anticipate the non-statutory, voluntary offering will be.

Finally, there will be an opportunity to provide more general comments or feedback to HESA, with the inclusion of some questions regarding our major transformation programmes and general principles of business.

We have put forward our best current understanding of what will be a statutory requirement across the UK, and what will therefore form part of a UK-wide statutory service.

For England, we are working with the OfS to refine the details of what sits within this statutory service, as their requirements are still being established and it is possible that some elements may move in or out of this category.

Within Wales, Scotland and Northern Ireland, our current understanding of the statutory requirements has been set out. It is also possible that changes may occur to this.

1.3 WHAT WE ARE ASKING

Our online platform includes two initial questions regarding who is responding to the consultation – these are questions 1 and 2, to align this document with that platform the questions begin at number 3.

What we collect, assure and disseminate

We are not asking questions regarding what we collect as a statutory service, as the scope of this is agreed with our statutory customers.

Although there is a divergence across the UK in respect of statutory requirements, we invite all respondents to answer all of the questions:

- Do you use the data included within this record?
- If so, for what purposes?
- Does the access to the UK-wide picture determine much of the value of this collection?
- With what frequency would the data need to be collected to meet your needs?
- Are there any areas of the collection that you feel are not necessary?
- Are there any areas that are not currently collected, but which you would like to be collected?
- If so, what and to what purposes would you put it?
- Are you likely to continue to subscribe to this record when the cost is part of a voluntary subscription?

In addition, we are asking a more general question within this section:

- Is there anything else that we should collect?
- If so, what and to what purposes would you put it?

The following questions are also being asked regarding the activities undertaken as part of our duty to minimise the burden of data collection.

- Are there any other services or activities that you would like to see provided to support the minimisation of burden?

Specific questions are asked about the Data Landscape Steering Group (DLSG):

- Are you willing to support the continuation of the DLSG and its role in the sector through your HESA subscription?

Your views on these are important and we want to ensure that we are shaping our support services to meet your needs.

How we support you

For the activities included within the **statutory subscription**, the following questions are being asked:

- Do you have any feedback regarding the activities detailed above that we are proposing to continue?

- Are there any activities that we have identified as statutory that you believe are not essential for your organisation? If so, please identify which and if appropriate why.
- Are there any additional activities you require from HESA to support you in your data submission activities, and to meet your data quality assurance obligations? If so, please identify which and if appropriate why.

For **non-statutory** activities the following questions are being asked:

- Of the activities listed as statutory requirements, are there any, when part of a voluntary subscription that you do not believe are useful to your organisation? If so, please identify which and if appropriate why.
- Are there any additional activities you require from HESA that you would like to support you in your data submission activities, and to meet your data quality assurance obligations? If so, please identify which and if appropriate why.

How we share and publish information

Questions are asked regarding the UK Performance Indicators;

- What uses are currently made of the UK Performance Indicators by your organisation?
- Do you support the continued production and publication of the UK Performance Indicators by HESA?
- What do you believe the main role and purpose of the indicators should be, and how should they inter-relate to other relevant metrics published by UK governments, regulatory and funding bodies?
- What do you think needs to change in the content, production processes or governance structures to ensure that the UK performance indicators can support the role and purpose you identified?

Regarding the uses of data, we ask about the continuation of current activities and how this should be conducted:

- Do you agree in principle to data collected in respect of your HE provider being shared by HESA for the following purposes? (Categories in relevant section)
- If you have answered 'No' or 'Unsure' to any of these categories, please can you explain why?
- Within the categories details, are there any potential types of recipients or data services that you would not support and which you would like to see removed from one or more of the categories?
- Do you have any further comments regarding onward use of data outlined or other uses not outlined above that you would like us to consider?
- We are currently reviewing the future of the DDS preview system for high profile data requests. Do you value and use the DDS preview system? Would the presence of this or a similar system make you more likely to agree to opt in to onward data sharing? Additional questions

An opportunity is provided for feedback to be given on the following subjects;

- The Data Futures Programme
- Graduate Outcomes
- Our communication and contacts with HE providers

1.4 HOW TO RESPOND

We are seeking one response per organisation. We would strongly encourage engagement across teams and departments within HE providers in the formulation of responses.

An email, including a link to the consultation platform, will be sent to all HESA subscribers. This will be sent to the Vice-Chancellor or Head of Institution and responses should be coordinated from there.

Access to our consultation site and the consultation document will also be available from our website for anyone to use.

In addition, we will be providing an overview of the process and timelines to each of our senior record contacts and record contacts, to ensure that they are also aware of the activity being undertaken.

Throughout the consultation period we will be working with representative groups, and directly with existing HESA contacts, to encourage this cross-organisational response. We will ask at the end of the response submitted for an indication of which departments from the organisation have been involved with the development of the response.

We are working closely with sector agencies and representative bodies to encourage their members to support them in providing consolidated and representative responses to the consultation.

Responses to this consultation can be made through the online platform at this address <https://consultation.hesa.ac.uk/>.

Details of events and opportunities to engage with HESA colleagues will be available on our consultation pages. Please keep checking as new activity will be added throughout the consultation period.

2. CONTEXTUAL INFORMATION

2.1 OUR STRATEGY

Our mission is to be the analytical powerhouse for the UK HE sector, and the trusted source of national HE statistics and public information. We seek to provide flexible, efficient, high-quality data, information and analytical services to meet our user needs, to support better decision-making in HE, to promote public trust and confidence, and to enhance the competitive strength of the UK HE sector.

We currently have four strategic aims:



Although the sector is rapidly changing, our mission remains the same. We will, however, be using the outcomes of this consultation and future engagements to review and refine our strategic aims.

Future plans

Working more closely with Jisc

In January we provided a statement signalling our intent to work more closely with Jisc. Discussions in relation to the future HESA-Jisc relationship are ongoing, and as such we are not able to provide any detail further to that which was provided in our [media statement](#).

Open data infrastructure

Expanding our Open Data Strategy to include the development of an open data infrastructure for UK HE will be a cornerstone of our future activity. Through the creation of open data tools and open coding frameworks we will drive efficiencies to meet the data needs of the sector.

Delivering increasingly cost-efficient services will be a natural consequence of improvements to the sector data infrastructure and will complement our existing activities that strive to deliver value for the sector.

2.2 CO-REGULATION AND SECTOR OWNERSHIP

HESA is a co-regulated sector agency, providing statutory services for the four governments and related bodies of the UK, but owned and funded by higher education providers. For England these arrangements were enshrined in the Higher Education and Research Act 2017, which explicitly stated that the designated data body (i.e. HESA) must not be a department or 'agent of the crown'.

The co-regulated nature of HESA has been embedded in the organisation's governance and operations since its inception in 1993. At that time, HESA was set up as a shared service, owned by the sector, with the aim of discharging the HE sector's data and information responsibilities in the most efficient way. This same ethos still runs through HESA today.

2.3 UK-WIDE SERVICE

Maintaining a UK-wide picture of HE is a key goal of HESA. It is more challenging as the regulatory and policy environments of the four nations diverge. Our statutory customers in each of the four nations recognise the importance of HESA's role in bringing together mixed requirements and maintaining, where possible, UK-wide standards. This is a fundamental part of HESA's role in the sector.

In addition to maintaining a UK-wide picture of HE, HESA seeks to ensure a consistent level of service across the UK - we wish to offer the same level of service to all HE providers.

2.4 SPECIFICATION OR REQUIREMENT CHANGES

Where details are known, and have been agreed, about proposed changes to our specifications or collections, these have been included. However, there are a number of existing changes that are yet to be evaluated, and therefore no detail has been included regarding those. We will consult separately on any additional changes, as appropriate.

2.5 DATA FUTURES

Within this consultation, a pre-Data Futures position has been put forward as, once developed, the subscription fee and agreements will come into effect from August 2019.

[Recent announcements](#) have confirmed that we will not be delivering Data Futures in 2019/20. The revised timeframe is being reviewed in parallel to this consultation, and as such it would not be appropriate to anticipate outcomes in this document.

The Data Futures Beta Pilot is continuing to be run with the 110 HE providers signed up to participate, and we continue to look to our participants to inform the progression of the solutions. Future changes to services and approaches as a result of Data Futures will be consulted on at appropriate times.

An opportunity to provide feedback or comments regarding Data Futures is included at the end of the consultation.

2.6 GRADUATE OUTCOMES

Our [Graduate Outcomes survey](#) has been confirmed as a statutory requirement across the whole of the UK. It is in its first year and so is being closely monitored and refined as part of its delivery.

There are no specific questions being asked about the Graduate Outcomes survey or its introduction. However, an opportunity to provide general feedback or comments is included at the end of this consultation.

2.7 DATA QUALITY

HESA's statutory customers consider that appropriate data quality is a HE provider responsibility. HESA sees its role as helping HE providers efficiently deliver data to the right quality level. In helping HE providers with this undertaking HESA, working with its statutory customers, determines what is the right level of services needed by administrative teams and those responsible for signing off HESA returns, and how this balance is achieved across statutory and non-statutory subscription.

In determining the right level of service for data quality, HESA would like to understand if there are changes that could be made to existing or planned services to enable HE providers to run their data quality processes more efficiently.

HESA data is collected to inform a range of statutory and regulatory functions within HE as well as policy development more generally. In addition to the mechanisms we use to help HE providers achieve data quality, HESA also needs to adhere to the [Code of Practice for Statistics set out by the UK Statistics Authority](#).

This consultation focuses on the activities that HESA performs that are directly linked to the collection, assurance and dissemination of HE data. It is not intended to provide a complete picture of all the activities undertaken by HESA: for example, information security and back office functions are not included.

3. WHAT WE COLLECT, ASSURE AND DISSEMINATE

HERA Section 64

Duty to compile and make available higher education information

(1) The relevant body must—

- (a) compile appropriate information relating to registered higher education providers and the higher education courses they provide, and
- (b) make the information available in an appropriate form and manner to the OfS, UKRI and the Secretary of State.

This section considers the data that we collect and the value that you place upon data not required for regulatory or statutory purposes. It also covers the activities we carry out within the HE data landscape (for example, regarding the stewardship of data). Questions are asked regarding the collections and activities identified as non-statutory. The articulation of the statutory requirements is for information only.

We know that the use-cases for our data stretch further than the requirements of the statutory customers. As such **we want to ensure that we continue to collect all of the data that is of value to the HE sector**. Where there is not a statutory requirement for data to be collected, and the required data relates to individuals, we will need to establish a legal ground under which we can collect and process the data.

More details about the legal basis on which we collect data can be found [within our Collection notices on our website](#).

HERA places a requirement on HESA as the DDB for England:

“to have regard to the desirability of reducing the burdens on providers relating to the collection of information”

This stipulation is also reflected in the requirements of statutory customers, other than the OfS. We refer to the minimisation of burden regarding our activities that seek to better manage the burden of data collection as a key aspect of all our UK data collection services.

Supporting this requirement runs through everything we do: however, our activities are considered in two ways:

- ensuring that we are only collecting, assuring and disseminating data that is necessary, and;
- facilitating long term efficiencies in the HE data infrastructure by promoting consistent data standards and governance.

Questions are included about the value placed on these activities for two purposes. Understanding the level of support within the sector for elements of our burden minimisation activity is important as it will support the decision whether this falls into a statutory or non-statutory subscription.

3.1 CURRENT RECORDS REQUIRED FOR REGULATORY OR STATUTORY PURPOSES

The data we collect is for the statutory/public functions of our statutory customers. The requirements vary across the countries within the UK.

Requirements in England, under HERA, have been articulated in the OfS [Data Strategy \(18\)](#)

The following collections have been identified as being required for statutory/public purposes in all four countries:

- Student Record
- Finance
- Higher Education – Business & Community Interactions
- Aggregate Offshore
- Provider Profile
- Unistats
- Graduate Outcomes

Required for England only:

- AP Student Record
- ITT
- Staff (expected to be a partial requirement, only relating to academic staff)

Required for Wales, Scotland and Northern Ireland:

- (The full) Staff Record
- Estates Management Record

HESA will include within its statutory subscription the services necessary to support collection, assurance and dissemination of the data in accordance with statutory requirements (to statutory customers, open data, Official Statistics and other statutory routes). The same services, when required to support non-statutory collections, will form part of the non-statutory subscription.

This section is based on the current agreed collection coverage. Although there are some fields that may be reviewed as to whether they continue to be necessary, the current assumption is all existing fields required for statutory activities will continue to be part of the collection.

The launch of the HESA Student Record on the HESA Data Platform (post-Data Futures) will encompass the data currently required for separate ITT and AP Student collections.

Student Record

As our largest and most complex collection, the Student Record provides the foundation of the information required by our statutory customers.

The collection includes:

Provider information	Information about the campuses and venues of the HE provider.
Student information	Personal characteristics, qualifications and proficiency, and biographical, geographical and demographic data. Also, information about the student's engagement and registration with the HE provider.
Curriculum: courses	Delivery information about the HE provider's planned and current courses, including locations, duration, subject(s), study patterns and modes of engagement, and accreditation.
Curriculum: modules	Delivery information about planned and current teaching and learning activity.
Study patterns	Information about student activity and study patterns, including information about modules studied and their outcomes, placements, study abroad and other off-venue activities and progression.
Outcomes	Information about the completion characteristics of students, the award of qualifications and/or credit and reasons for leaving.
Funding and monitoring	Information about the fees and funding arrangements of students. Also, information connected to funding and regulatory requirements to identify populations of students within specific parameters of interest, for the purpose of tracking the progress of initiatives, ensuring the proper use of funding and undertaking monitoring in support of regulatory requirements.

We are aware that some elements of this collection will not be required for those English HE providers registering as 'Approved' for example Approved providers will not need to submit module data.

We augment the Student Record with fields for purposes not requested by our statutory customers, for example to support Data Supply to the General Medical Council. The collection of these fields will not form part of the statutory subscription as they are an optional service to help the sector operate more efficiently, further details about onward use can be found in section 5.

Finance

The collection includes:

Consolidated financial statements	Statement of comprehensive income and expenditure, changes in reserves, balance sheet, and the statement of cash flows.
Financial analysis	Income analysed by source, including tuition fees, education contracts, research grants and contracts, and specific funding body grants. Expenditure analysed by activity, including capital expenditure.
Remuneration	Details of the remuneration of the head of the HE provider and highly-paid staff, including details of severance payments and other compensation.

We are aware that some elements of this collection will not be required for those English HE providers registering as 'Approved' and/or not seeking Research England funding.

Higher Education - Business Community Interactions (HE-BCI)

The collection includes:

Survey	An annual survey of the HE provider's policies and goals with regards to business and community interactions.
Tabular data	Data relating to the scope and scale of the HE provider's business and community interactions activities, including the financial value of collaborative and contract research, the provision of consultancy, CPD and facilities/equipment-based services, funding from major regeneration programmes, patents, software and other licenses, income from Intellectual Property, and the characteristics of spin-offs from staff and student activity. The data also includes information about public engagement events and audiences.

A review of the HE-BCI record will be undertaken during the course of 2019/20.

Unistats

The collection includes:

provider and planned curriculum	Information about the HE provider, its planned course delivery information, and identifiers to permit this information to be linked to other data, for publication via Unistats.
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Unistats as a record is currently under review on behalf of the statutory customers and requirements linked to it may change.

Provider Profile

The collection includes:

provider	Information about the HE provider, including its campuses or venues, academic cost centres and their relationship with internal departmental structures.
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This collection may be superseded by the HESA Student Record through Data Futures. This is to be agreed with our statutory customers. However, until this has been agreed the information will still be required to be returned and collected.

Aggregate Offshore record

The collection includes:

Provision	Basic information about the broad types of transnational education curriculum provision studied by students based wholly overseas.
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In accordance with the OfS Data Strategy, this may become an individual level return for HE providers in England and could become an individual level return for other HE providers if required by statutory customers in other administrations

Graduate Outcomes

The Graduate Outcomes survey is structured differently to our other collections, as it is comprised of data collected through the surveying of graduates. (The data collection elements of Graduate Outcomes are limited to the provision of contact details.)

Graduate Outcomes is expected to continue in its current structure, with a subscription fee invoiced as a separate part of the statutory subscription. The invoice is aligned with the survey population (the file for which is generated in November).

Staff

The collection includes:

Person	The Person entity identifies staff employed at the HE provider, and describes their personal characteristics and qualifications.
Contract	The Contract entity describes the details of the contract(s) held by staff at the HE provider.
Governor	The Governor entity records the details associated with a person's status as a member of the HE provider's governing body.

In Wales, Scotland and Northern Ireland this information is required for all staff.

In England this requirement will be limited to academic staff only.

Estates Management Record

This collection includes:

Estates finances	Information about the costs relating to the HE provider's estates and facilities.
Buildings and functionality	Information about the characteristics of the HE provider's physical estate, its footprint, condition and usage.
Energy	Information about the HE provider's energy consumption and waste, including the generation and usage of renewable energy, water, and targets for carbon reduction.

This collection is a statutory requirement in Wales, Scotland and Northern Ireland.

We are aware that in England, elements of this record may be required in other records.

This section is for information only, as the regulatory or statutory requirements are defined by our statutory customers.

3.2 EXISTING COLLECTIONS NOT REQUIRED FOR REGULATORY OR STATUTORY PURPOSES IN ENGLAND

Given that the data collection requirements of some of our statutory customers are changing, we are keen to explore with you whether there is a sector requirement for HESA to continue to collect all or part of the collections in those parts of the UK for which they are no longer identified as a statutory requirement.

Where we establish a requirement, it will be for each HE provider to determine if they wish to make non-statutory data returns.

We believe that the data in these collections is important and we know that the information is used within the sector today. Three criteria must be established for HESA to continue to collect data required by the sector for non-statutory purposes:

- That it is required by the sector (i.e. the sector says it wants it).
- That there is a clear legal basis under which HESA can collect and process the data.
- How we can fairly charge for the collection, assurance, integration (including the supporting services) and dissemination of this data.

As described above, maintaining a UK-wide picture of HE information is a key aim of HESA. In order to meet this aim, we believe it is important that HE providers participate in non-statutory collections. The information generated from collections with a lower percentage of HE providers will not be as useful due to the incomplete picture it will provide.

Estates Management Record

The principal use for the information derived from this collection is the Higher Education Estates Management Report, produced annually by the Association of University Directors of Estates. This report supports strategic decision making and supports benchmarking, with the KPIs in the report charting the sector's performance against efficiency and sustainability goals. Data is also used in league tables (such as People and Planet's University League) and by the construction industry.

As stated above this collection includes:

Estates finances	Information about the costs relating to the HE provider's estates and facilities.
Buildings and functionality	Information about the characteristics of the HE provider's physical estate, its footprint, condition and usage.
Energy	Information about the HE provider's energy consumption and waste, including the generation and usage of renewable energy, water, and targets for carbon reduction

From 2019/20 this collection is a statutory requirement in Wales, Scotland and Northern Ireland only.

More details can be found on our [coverage statement for the Estates Management Record](#).

We are aware that in England elements of this record may be required in other records.

Staff Record

Person	The Person entity identifies staff employed at the HE provider, and describes their personal characteristics and qualifications.
Contract	The Contract entity describes the details of the contract(s) held by staff at the HE provider.
Governor	The Governor entity records the details associated with a person's status as a member of the HE provider governing body.

This whole collection is required for statutory purposes in Wales, Scotland and Northern Ireland.

It is expected that in England the provision of this information, in relation to atypical or non-academic staff, will be a non-statutory requirement from 2019/20.

QUESTIONS

ESTATES MANAGEMENT RECORD

3. Do you use the data included within this record?
4. If so, for what purposes?
5. Does the access to the UK-wide picture determine much of the value of this collection?
6. With what frequency would the data need to be collected to meet your needs?
7. Are there any areas of the collection that you feel are not necessary?
8. Are there any areas that are not currently collected, but which you would like to be collected?
9. If so, what and to what purposes would you put it?
10. Are you likely to continue to subscribe to this record when the cost is part of a voluntary subscription?

STAFF RECORD

11. Do you use the data included within this record?
12. If so, for what purposes?
13. Does the access to the UK-wide picture determine much of the value of this collection?
14. With what frequency would the data need to be collected to meet your needs?
15. Are there any areas of the collection that you feel are not necessary?
16. Are there any areas that are not currently collected, but which you would like to be collected?
17. If so, what, and to what purposes would you put it?
18. Are you likely to continue to subscribe to this record when the cost is part of a voluntary subscription?

GENERAL

19. Is there anything else that we should collect?
 20. If so, what and to what purposes would you put it?
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The information gathered in response to these collections will inform the future HESA subscription model and agreements, the details of which we will consult on later this year.

Please note, any additional data collection identified as being required would likely form part of the non-statutory offering.

3.3 MINIMISING THE BURDEN OF DATA COLLECTION

HERA Section 64

- (8) In performing the duty under subsection (1)(a), the relevant body must—
- (a) cooperate with other persons who collect information from registered higher education providers, and
 - (b) have regard to the desirability of reducing the burdens on such providers relating to the collection of information.
- (9) In carrying out other functions under this section, the OfS and the designated body must have regard to the desirability of reducing the burdens described in subsection (8)(b).

HESA, through its statutory and charitable purposes, has a duty to ensure that it is minimising the burden of data collections on HE providers. A key way to achieve this is through the activities we undertake to support an effective HE data landscape. These activities enable us to measure and evaluate the burden of new data requirements, whilst also identifying and promoting activities that will drive longer term efficiencies.

It is important that work is done to maintain and improve the underlying data infrastructure of the HE sector. As with any system, to protect ongoing efficiency for all involved, innovation and development are required to evolve and maintain resource requirements. In short, if a system is not curated and improved it quickly becomes inefficient and burdensome for those involved. We believe that our central role in the UK HE sector allows us to support those involved in data supply and demand in achieving this agenda.

In addition to facilitating long term efficiencies we are working to reduce the number of data collections undertaken overall in the sector. By applying our principle of collect once, use many times HESA will seek to meet these additional collection requests, enabling us to directly reduce the burden of data supply on HE providers.

HESA is an independent, co-regulated sector agency. Our organisational and data governance arrangements allow us to evaluate and manage the burden of data supply, seeking to influence and reduce it where appropriate. In acting as a hub for HE data we are able to work with other data requesters to minimise the burden of data supply for both individual HE providers and the sector. We currently work with the [Data Landscape Steering Group \(DLSG\)](#) to promote this aim.

In accordance with the HERA requirements (above) for the OfS and at the request of other statutory customers we have considered what is reasonably required to achieve the appropriate level of data quality. These considerations have been used to inform how activities should be split between statutory and non-statutory requirements.

Statutory Burden Minimisation activities

Burden measurement

The mechanism for assessing the cost of change for both HE providers and HESA to enable informed decisions, and a sector level understanding of the cost of regulatory compliance. Additionally, it offers HE providers an opportunity to understand where further cost minimisation could occur.

Collection consultation and review

An annual review is usually short, sometimes involving consultation but this is not always required. A major review can span over a number of years, and usually consists of multiple review meetings and consultations before the changes are announced. Consultation activity could happen every year for a collection.

We feed back any consultation-type activity and the announcement of what has actually been changed for that year in our Reviews area - <https://www.hesa.ac.uk/innovation/records>

Principles and Codes of practice

The underpinning framework that support a co-regulated governance environment of data collections, outlining behavioural expectations for all parties involved in these activities.

Data standards development

The identification, assessment and adoption of existing standards, or the development of new sector level data standards to support harmonisation of data and common understanding.

Standard data set management

The curation of the logical data model and the data dictionary that forms the basis of HE data collections.

Integrating datasets

An additional activity, integration of data, linking data from varying datasets to provide a single source is identified as a requirement within the [OfS Data Strategy](#) (27) and is a desire of other statutory customers.

As with the supporting services detailed in the following section, these activities are only considered as statutory in relation to the collections required for statutory purposes. For non-statutory collections these services are undertaken, and included within, the non-statutory subscription.

QUESTION

21. Are there any other services or activities that you would like to see provided to support the minimisation of burden?

The Data Landscape Steering Group (DLSG)

The [Data Landscape Steering Group](#) (DLSG) brings together senior representatives from data collectors and HE providers across the UK and is supported by an operational team on an Advisory Group. It was formed with the primary aims of reducing burden on HE providers and improving the quality and timeliness of HE data. It does this through promotion of data standards and of a standard data model, fostering closer collaboration and understanding between HE providers and data collectors and working to improve behaviours and drive efficiency. The vision is for fewer organisations making direct data demands on HE providers, better use of HESA collections, and better formed data requirements which are less resource-intensive for HE providers to satisfy. The OfS, SFC, HEFCW and DFE(NI) all support the code of practice developed by the DLSG.

HESA currently convenes and provides support to the Data Landscape Steering and Advisory Groups. We believe that the work they do has a very positive impact on the efficiency and effectiveness of the sector data landscape, delivering value for HE providers and data collectors.

QUESTION

22. Are you willing to support the continuation of the Data Landscape Steering Group (DLSG) and its role in the sector through your HESA subscription? Please explain your answer.

Your views on these are important and we want to ensure that we are shaping our support services to meet your needs.

4. HOW WE SUPPORT YOU

HE providers are supported by HESA in the submission of data to us through a range of services. We offer support to HE providers across the wide range of size and data capability.

Maintaining the stringent data quality standards required for statutory data and effective dissemination (as identified in the [Code of Practice for Statistics](#)) are essential, and it is through these supporting services that this is achieved.

The support activities provided cover the spectrum of HESA's current services: from the development of collection systems; the management of the specification and statistical analysis; to the experts at the end of the phone in our Liaison team.

HERA

s64. Duty to compile and make available higher education information

s65. Duty to publish higher education information

An appropriate level of data quality is required to fulfil these duties. Those services identified as statutory are essential to maintain this level of data quality.

Delivering each of these supporting services has a cost associated with it. A constant challenge is to find the right balance between keeping the subscription costs as low as possible and providing an appropriate level of service to ensure continued data quality, and to prevent more costly interventions post collection. We also strive to find ways to deliver our services in a more cost-efficient way, exploring new technology and delivery mechanisms to benefit HE providers. Supporting HE providers in the required level of data quality to discharge regulatory and statutory requirements is a statutory activity and as such forms part of the statutory fee, in England this is linked to HERA (as above).

We understand and acknowledge that the level of support required by HE providers varies across the sector. In establishing what services should be identified as essential a 'typical' HE provider has been considered, based on our experience and understanding of current HE provider requirements.

However, through the process of consultation we want to confirm that we have got the balance between our mandatory statutory subscription and voluntary non-statutory subscription correct. We will continue to develop our non-statutory offering so that it meets the widest possible range of needs, according to the demands of customers.

Through these activities we collect data, assure the quality of it, integrate it to ensure it links with previous data supplied, and ensure that the standard HE data model is comparable across HE providers with different HE provisions and across reporting periods. In addition, we disseminate the resulting information to statutory customers and through open data and Official Statistics.

Our dissemination activities are covered in section 5, how we share and publish information.

Our current offering has been described within these pages, categorised as explained above into statutory and non-statutory services. We expect the services offered, both statutory and non-statutory, to develop and evolve over time, to continue to meet the needs of HE providers and our statutory customers.

4.1 STATUTORY SUPPORT SERVICES

The following services will form part of the statutory subscription where they relate to the collection, assurance and dissemination of those records required for statutory purposes.

Collect

The collection

All of our collections are underpinned with detailed data specifications. Creation and curation of the data specification involves a range of activities. The coding manual is the technical specification for the data requirements for collection of a specific record. Coding manual support guides provide up-to-date materials and details about how the record is processed and the background to the collection.

The coding manual includes coverage, the collection schedule, revision history and guidance. Guidance provides users with information to help them to interpret and code data items.

The schema is the blueprint of the organisation of data, showing how a file can be constructed for submission. Schema checks form the first stage of our quality assurance activity (as detailed in our Quality section).

Any necessary changes to the collection are captured in the data model. Changes are to be expected - even minor items change from year to year, or a new rule is needed to capture additional data.

We issue collection notices to inform data subjects how their data will be used to ensure that both HESA and HE providers meet their data protection law requirements.

We offer support tools, of which the data entry tool (<https://www.hesa.ac.uk/support/tools-and-downloads/data-entry-tool>) allows some HE providers to manually enter their students using this tool. They then receive an XML file that they can submit directly into the data collection system

Our suite of support tools also includes the Microsoft Windows desktop application (<https://www.hesa.ac.uk/support/tools-and-downloads/amal-tool>) that amalgamates multiple XML files together, outputting one large XML file:

We aim to publish 'notification of changes' a year in advance of the collection starting. We provide taxonomies, the various lists of relevant content usually related to the data model, e.g. cost centres (<https://www.hesa.ac.uk/support/documentation/cost-centres>) for use.

It is always our aim to meet the agreed timescales. However, we are subject to the requirements of statutory customers. The OfS for example include the following in their Data Strategy (November 2018)

“Where we do make changes, we will give providers as much notice as possible, although we will not hesitate to act quickly where collecting new or different data will improve our effectiveness in supporting students’ interests.”

Collection platforms

Technical support is required for the bespoke collection platforms underpinning HESA collections. This includes software support, technical delivery of the opening and closing of collections as well as coordination of updates and new business requirements.

Liaison & Operations Team

Our Liaison team are expert analysts. By working directly with key contacts, they have developed collaborative relationships across our subscriber base.

These collaborations help shape the technical guidance published to support you with the return of data. They consult and review with colleagues across the sector (through the data collection process), demonstrating our commitment to governance best practice and collaboration.

The Liaison team facilitates our issue resolution process, allowing HE providers to rectify errors in submissions throughout the quality assurance process.

In addition to supporting HE providers, our Liaison team often take the lead with a wide range of data collection and supplier bodies, attending events and participating in activities with software houses, regulatory bodies, and others in the sector.

Statutory training

Training similar to that currently delivered within our ‘introductory sessions’ will be delivered at venues across the UK for the following of our more complex or new records:

- HESA Student Record,
- Staff Record,
- Graduate Outcomes.

In addition to providing two spaces for each HE provider at each of these sessions all records will be supported by e-learning packages.

For other records training will be provided through e-learning, webinars and other training options. The balance and appropriate level of training will constantly be reviewed.

Legal and regulatory information

The HESA website and communications with HE providers include extensive information about the flows of data through the HE sector, and the legal bases underpinning these transfers of data. Documentation, written agreements, and HESA’s dedicated legal and information security teams provide a resource and reference for information and best practice in data protection.

Assure

Assurance activity at HESA includes maintaining constituent lists via our subscriber base – this is the list of which HE providers should be submitting to which collection, in which year. This changes annually as more HE providers join, also merge or de-merge. We also take into account any name changes.

Once a collection is complete and signed-off, the data is migrated to our fixed database. HE providers and statutory customers can request amendments and fixes to previously signed off data in the fixed database and if this is required, we create a snapshot of the original data, to ensure we run correct comparison reports.

Our quality assurance activity is at the core of our responsibility as a data collector and we perform this via a wide-ranging suite of internal systems and processes, further reinforced with external reporting and assurance activity.

From the initial submission of a file linked to any collection, we perform schema checks – this ensures the file matches the database schema exactly.

Our quality rules validate the data submitted to the data collection system in line with the guidance published in the coding manual. The rules form a business logic that is applied to data - we create and curate rules in line with requirements.

Rules can work at individual record level, or at the overall credibility of groups of records within a specified tolerance.

We assist HE providers in their own quality assurance activity with a range of reporting tools.

Credibility reporting shows HE providers back their data in particular ways, including continuation between years (i.e. students return when they are in the middle of their studies). This is often used directly in Minerva* checks or as quality rules, to help HE providers quality assure their data.

Minerva checks are manual checks carried out by HESA, (or by statutory customers in some cases), which a HE provider then needs to confirm before their data can be considered ready to sign-off.

We manage our Iris system that sends data to statutory customers, who then add other bits of confidential data into some reports and send it back to us. This means we can incorporate data that HESA doesn't have access to, in the data collection system.

Verification against external sources include comparison against UCAS *J data, Office for National Statistics, UK Register of Learning providers (UKRLP) and other official records.

Our year-on-year comparisons check back on the previous year's data, to see if it is roughly the same - such as general population numbers. We also do sector comparisons in some cases.

Further assurance activity includes cross-collection checks to ensure different data streams give a consistent representation of a HE provider.

Our 'data supply' gives data back to HE providers, including derived fields (to aid assurance).

The Unistats preview presents a replication of what a HE provider's data might look like on the Unistats website. The 'Population - NSS and Unistats' (report) shows which (cohort) students might fall into.

* Minerva is our online database containing information and queries relating to your data submissions to us.

Integrate

Our activities to integrate data include maintaining our data warehouse which is the source of all historical collections, as well as data enrichment activity to create and supply derived fields together with linking to other data sources to generate greater value from the data.

Derived fields are provided to HE providers and statutory customers to assist when understanding the onward usage of data. These fields are currently given back to HE providers in Data Supply reports and are used by HESA analysts to create bespoke datasets.

Our data enrichment covers a wide range of activities, all aimed at generating a richer source of analytical outputs that can be used for HESA's own publication activities as well as providing the outputs to HE providers and our customers.

Some of our core enrichment activities include:

Populations and counts

We define standardised methodologies for restricting data to a suitable population dependant on the type of analysis to be performed. In conjunction with populations we also define how and what should be counted to ensure analytical outputs are fit for purpose.

Aggregations

We define standard groupings (or utilise already existing standards) for some of our commonly used fields as an aid to analysis and to ensure consistency across outputs. This ranges from grouping qualifications into undergraduate/postgraduate categories to grouping ethnicity categories so that they align with other statistical outputs.

Linking to third party mappings

We utilise third party mappings to derive greater value from our data and use these in our statutory outputs to HE provider a greater richness of data dissemination. This can range from producing a wide range of geographical outputs by mapping postcodes to ONS data to categorising schools attended prior to higher education as state/independent in order to monitor widening participation within the sector.

SIC/SOC coding

Working with a third-party organisation to produce Standard Occupational Classification (SOC) and the Standard Industrial Classification (SIC), used in the Graduate Outcomes collection (formerly Destinations of Leavers from Higher Education (DLHE)). These classifications are produced from a list of job titles and other employment information that graduates have submitted and allows for detailed analysis of graduate employment activity.

Tracking students

We track students across years to give a complete picture of their HE experience which allows us to analyse student pathways such as continuation rates and how students move between HE providers within the sector.

Unistats

We combine data from a range of collections to create the Unistats collection; this data is published on the Unistats website to help potential students to decide what undergraduate course they want to study, and where they want to study it. The data is selected from collections that

include: Student/AP Student, DLHE (Graduate Outcomes), National Student Survey (NSS) and Longitudinal Education Outcomes (LEO) outputs.

We also provide the mechanism for transferring data to and from the Department for Education (DfE) for Teacher Reference Number (TRN) allocation.

QUESTIONS

These activities are essential to meet the requirements of our statutory customers. As such they will form part of a statutory subscription.

23. Do you have any feedback regarding the activities detailed above that we are proposing to continue?

24. Are there any activities that we have identified as statutory that you believe are not essential for your organisation? If so, please identify which and if appropriate why.

25. Are there any additional activities you require from HESA to support you in your data submission activities, and to meet your data quality assurance obligations? If so, please identify which and if appropriate why.

Please note any additional services identified as being required would likely form part of the non-statutory offering.

4.2 NON-STATUTORY SUPPORT SERVICES

Supporting non-statutory collection

Our assurance activities and supporting services, identified as being essential (those listed within the section 4.1), are intrinsically linked to the collections for which they are performed. This means that where a HE provider opts to undertake a non-statutory collection the costs of the supporting services will form part of the non-statutory subscription, for that HE provider (for example the quality assurance process).

Supporting activities charged outside of subscriptions

We currently, and will continue to, offer a range of [training options](#) for HE providers across the spectrum of HE data needs: from the on-boarding of new registered HE providers and major change programmes activity, to technical data system training.

We also offer a data capability toolkit. This self-help assessment and its supporting materials and information, as well as evaluation and synthesis of sector level maturity, facilitates HE providers in implementing data capability improvement activity.

QUESTIONS

26. The activities listed in section 4.1, when linked to non-statutory collections, will form part of the non-statutory subscription.

Are there any, if they were part of a voluntary subscription, that you do not believe are useful to your organisation? If so, please identify which and if appropriate why.

27. Are there any additional activities you require from HESA that you would like to support you in your data submission activities, and to meet your data quality assurance obligations? If so, please identify which and if appropriate why.

5. HOW WE SHARE AND PUBLISH INFORMATION

As with other parts of our services, there are elements of our current provision that will fall within our statutory subscription, and others that will fall outside it. We appreciate that HESA's data sharing activities and access to higher education data is of high importance to HE providers, and others in the sector.

In England, Sections 64 and 65 of HERA set out the DDB's duties to publish and make available higher education information; these are very narrowly defined. We consider it essential that HESA continues to offer data sharing services that are wider than those prescribed within HERA and outside its functions as DDB.

To maintain the current onward data sharing services that we offer, both to HE providers and the wider sector, we will need the explicit agreement from each HE provider for the onward use of their data, in a similar manner to that which we do currently.

In England, without this permission from an appropriate number of HE providers, we may no longer be able to operate services such as Heidi Plus, or share data with HE providers, as these uses sit outside of the HERA prescribed activities.

Within our non-statutory section (5.3), an opportunity will be provided for you to indicate whether you support our current approach for securing permission, as well as an opportunity to comment on the onward uses of data that are included within the existing subscription agreement.

This section also contains specific questions regarding the UK Performance Indicators that HESA produces to ascertain whether there is an appetite within the sector to continue to support these outputs.

5.1 STATUTORY ROLE TO MAKE AVAILABLE AND PUBLISH HIGHER EDUCATION INFORMATION

HERA s64 & s65

‘compile appropriate information relating to registered higher education providers and the higher education courses they provide, and make the information available in an appropriate form and manner to the OfS, UKRI and the Secretary of State’

‘publish, or arrange for the publication of, appropriate information relating to registered higher education providers and the higher education courses they provide’.... ‘at appropriate times’

The statutory role of HESA for Wales, Scotland and Northern Ireland is to support HE providers to fulfil their reporting responsibilities and share the data with the relevant statutory customer bodies (and other approved statutory customer recipients) and make available Official Statistics.

In England, with regard to the above duty to publish, what constitutes appropriate information and appropriate times is determined by the OfS. Given this, it is currently not possible for us to provide a detailed overview of what OfS requirements will be regarding the publication of higher education information. What follows, therefore, is our understanding of the current position and, subject to agreement with the sector, it will be open to HESA to make available information outside its DDB role for England.

Statutory requirements in Wales, Scotland and Northern Ireland:

- Provision of data to the:
 - Scottish Funding Council, HEFCW or DfE NI
 - UKRI
 - Devolved governments
- Publication of Official Statistics

Duties prescribed in HERA:

- Provision of data to the:
 - OfS
 - UKRI
 - Secretary of State
- Publication of Official Statistics

We are in discussions with OfS and HESA’s statutory customers to clarify how data will continue to be able to be shared amongst them to enable HESA’s statutory customers to continue receiving UK-wide data. We are anticipating that the costs of the process agreed by them will continue to fall within the Statutory Subscription.

In England, the following data sharing expectations of the DDB have also been identified from the OfS and we anticipate that these will also be endorsed by the statutory customers in other administrations:

- Publication of a much wider range of data as machine readable open data. It is currently intended that this will be delivered via an online self-service tool (currently in the planning stage).
- Making available data for academic research via the ONS Secure Research Service

We will be producing a Data Protection Impact Assessment for both of these activities. For the new open data tool, HESA will be giving careful consideration (including using specialist disclosure control advisers) to the form of the disclosure control used in the tool to maximise the usability of the data whilst complying with the GDPR Article 5 principles. We anticipate that both the OfS and the HE Funding Bodies will be closely involved in the development of this new tool.

All of the above will be treated by HESA as statutory requirements, and as such the cost of performing these activities will form part of the statutory subscription.

Please note that in section 5.3, we deal with non-statutory data sharing activities as we recognise that, for many users of HESA open data may not be sufficiently detailed to enable them to continue to be able to perform the activities that they currently undertake, many of which are essential to the sector.

The UK Performance Indicators, and how they will continue, is currently uncertain. The following section has been included to establish the appetite within the sector for their continuation and how this could be supported. Following the outcomes of this consultation, it is possible that they may become an OfS statutory requirement in England.

5.2 UK PERFORMANCE INDICATORS – A FUNDAMENTAL REVIEW

The [UK Performance Indicators \(UKPIs\)](#) have been produced and published by HESA since 2002/03 on behalf of our statutory customers the four UK higher education (HE) funding bodies, under an arrangement whereby the former Higher Education Funding Council for England (HEFCE) funded their annual production and took a leading role in their governance.

These indicators were designed to provide reliable information on the nature and performance of the higher education sector in the UK and a consistent set of measures for this performance. The intention was to contribute to a greater public accountability by the sector, as well as to ensure that policy decisions could be made on the basis of consistent and reliable information. They were specifically intended to address areas of long-term relevance and importance in HE provider performance, rather than address shorter-term and transitory policy interests. They were also intended to provide a UK-wide perspective, utilising consistent definitions and methodologies across the UK wherever possible.

The indicators currently cover three main areas:

- Widening participation (e.g. proportion of entrants from state schools and low participation areas)
- Non-continuation rates (following year of entry and projected completion)
- Employment of graduates.

In recent years, the indicators have expanded to include experimental equivalent indicators for Alternative HE providers, adopting adjustments in definitions to optimise comparability between these providers and the previously-covered HE institutions. They have also undergone significant presentational changes to make them more interactive and accessible. Since the last [fundamental review of the UK Performance Indicators](#), carried out in 2013, both the UKPIs themselves, and the environment on which they report have significantly changed.

Discussions with the OfS have concluded that the funding arrangements for the production of UKPIs would need to change and that the OfS would not drive their development and governance in the way that HEFCE did previously. As a result, the previous governance structure has been dissolved. Future production of the UKPIs would require the establishment of a new governance structure and funding arrangement, probably incorporating production and maintenance costs within the HESA subscription charge (whether this would be within the statutory or non-statutory subscription is still to be agreed).

Over the past several years we have seen new metrics and indicators emerging which address particular policy areas and initiatives across the UK. Within England, the Teaching Excellence and Student Outcomes Framework (TEF) has seen a number of the UKPIs indicators adopted and modified for that use, leading to published measures that differ from the original versions. The impact and public profile of the TEF metrics have, arguably, refocused attention of HE providers and other previous users of UKPIs to the TEF variants. OfS intentions on Access and Participation Plans also signal development of new measures that are likely to further diverge from UKPIs.

Within Scotland, we have seen the development of separate metrics that directly reflect the different policy/regulatory environments and areas of focus. A good example of this is in measures of disadvantage, where classifications such as the Scottish Index of Multiple Deprivation are preferred to participation rates by statistical wards (i.e. the 'POLAR' classification). This is due to

key differences such as the relatively high (in UK terms) participation rate in Scotland coupled with the very high proportion of HE that occurs in FE colleges.

In Wales, the UKPIs are utilised in applications such as HEFCW corporate strategy targets and/or national measures and by HE providers in fee and access plans. However, the measures are often used alongside other measures, for example POLAR participation rate indicators are used alongside Welsh Index of Multiple Deprivation (WIMD) measures.

In Northern Ireland, UKPIs are also utilised across a range of areas but deprivation measures such as the Northern Ireland Multiple Deprivation Measure (NIMDM) have been around for many years and are generally considered to have greater traction.

Given the significant changes in the higher education environment, the increasing variety of alternative measures and the imminent requirement to establish new governance and development structures, this would appear to be an opportune moment to re-examine the role and purpose of the UK performance indicators. We therefore seek the views of our stakeholders and statistics users on the following questions.

QUESTIONS

28. What uses are currently made of the UK Performance Indicators by your organisation?
29. Do you support continued production and publication of the UK Performance Indicators by HESA?
Yes
No
30. Please explain your answer
31. If you answered Yes, what do you believe the main role and purpose of the indicators should be, and how should they inter-relate to other relevant metrics published by UK governments, regulatory and funding bodies?
32. If you answered Yes, what do you think needs to change in the content, production processes or governance structures to ensure that the UK performance indicators can support the role and purpose you explained in the previous question?
-

5.3 ONWARD USES OF DATA NOT CONSIDERED AS STATUTORY

Background

HESA currently and has historically acted as an information hub, using and making available data for a variety of purposes that will not fall within the new statutory subscription and which for England are not specified as part of the DDB functions within HERA. For the avoidance of doubt all of these purposes constitute statistical purposes processing.

HERA was specifically drafted to ensure that it did not restrict HESA's information hub activities, enabling HESA to continue to perform these activities but not in its capacity as DDB. In future, the processing of data and the resulting data sharing activities will be dependent on the terms set out and agreed in the Subscription Agreement with HESA subscribers. In addition to agreeing this position with HE providers, HESA must also reach agreement with the HE funding and regulatory bodies.

HESA undertakes its data sharing activities as part of its charitable object to advance education, and because HESA considers it in the public interest to do so. Acting as the sector's data hub enables HESA to reduce the burden and cost of data supply on HE providers by enabling HESA to operate as a shared service. This also improves the quality and comparability of the data, thereby enhancing its usefulness. This embodies the previously endorsed principle of 'collect once and use many times' and supports our statutory requirement to reduce burden.

What's included and what's not?

Data could be shared from any of HESA's collections, and could include data that may be sufficiently detailed to be categorised as personal data, as well as data from collections that do not relate to individuals. Care is taken to ensure we do not share commercially sensitive information.

Not all data collected by HESA has been or will be made available for all onward uses. HESA has never provided data for any commercial purpose that would affect any individual or involve contacting individuals, e.g. we never permit our data to be used for direct marketing.

In addition, HESA has systems and processes in place to consider the legality and sensitivity of data requests before we proceed which include:

- For requests which may include personal data we undertake data protection assessments.
- For high profile uses, e.g. league tables we also operate the Data Dissemination System (DDS) to enable HE providers to securely preview their own data and to provide them with the opportunity to opt out of having their data included in the request. HESA is currently considering the future of this service.

Your views on data sharing activities

To help inform the development of our new Subscription Agreement we are seeking your views on HESA's data sharing activities.

We have grouped the uses of data into six categories to allow us to capture your views, this will then be used to inform development of our subscription agreement. Please note that these categories may change as a result of the feedback that we receive from this consultation.

It is currently planned that through our new subscription agreement, HE providers will have the option to select specific categories regarding onward use. This is only related to data collected after 1 August 2019. Data collected prior to this date will continue to be processed by HESA and will not be covered by the new opt-in process. Please note that it is possible that the process/contractual terms in the Subscription Agreement for onward sharing of data may vary across the United Kingdom following the consultation, to take into account the views of the relevant HE funding or regulatory body under whose powers the data is collected.

Costs for these services are currently recovered by charging a fee to data users and providing information under licence (including specific permitted purposes and retention periods). HESA has historically used any surplus generated from these activities to contribute to its operating costs and thereby reduce the need to increase subscription costs. HESA will continue to reinvest any surplus from its onward data sharing activities in its operations.

Planned changes

While the approach taken across the UK could vary after the consultation, it is currently planned to have a mechanism for providers to select the categories of onward use that they wish their data to be used for. For the avoidance of doubt choosing one category of usage would not necessitate choosing any of the others. However, a reduced proportion of HE providers participating in any of the categories of onward uses of data would diminish the statistical value of the information. This would also result in increased operational costs and potentially to the withdrawal of the service altogether (if the proportion of HE providers opting out reaches a level that renders the service inoperable or disproportionately expensive to operate).

Examples of specific HE provider activities that would potentially be compromised or withdrawn through the inability to share data (other than via open data), and which rely on HESA data, would include:

- accessing sector wide data via Heidi Plus or bespoke data requests
- benchmarking and efficiency performance
- research (e.g. for new course provision) unless undertaken within the ONS Secure Research Service (SRS)
- bespoke, commissioned analysis to improve student access experience and outcomes
- compliance activities
- HESA responses to FOI requests

Our publication of a wider range of Open Data, and the planned online self-service tool supporting this, will result in more data being available as Open Data through this resource. It may be possible over the longer term that this will fulfil some of the needs of those using data in the ways detailed below.

It is important when considering these uses to remember that HESA is a charity working on behalf of and for the HE Sector. Data is never provided for any commercial purpose that would affect any individual or involve contacting individuals.

Categories of non-statutory onward uses of data

Six categories of onward use are described below and reflect the uses permitted by the existing subscription agreement and referred to in the HESA Collection Notices. Given our charitable aims, we are of the view that all outlined onward uses of data HESA undertakes directly or indirectly benefit HE providers and students. We have sought to categorise the variety of activity HESA undertakes into six main categories but some activities have multiple beneficiaries. For the purposes of this consultation we have summarised the uses so that the beneficiaries from these data sharing activities can be easily identified. Copies of the HESA Collection Notices are published on the HESA website and set out the legal bases for processing HESA data.

For all six categories, HESA justifies processing of personal data under GDPR because they are:

- “necessary for the performance of a task carried out in the public interest” (Art.6.1. (e)) – e.g. the public interest in understanding the provision and outcomes of publicly funded and regulated higher education,
or
- “necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data” (Art.6.1. (f)) – e.g. the legitimate interest of research into understanding characteristics of student customer markets, e.g. student accommodation developers and financial services HE providers.

Category 1 - Uses of data that are for the direct benefit of HE providers

This category describes onward use of data where HE providers routinely use HESA data (that would not be delivered by the statutory and open data outputs referred to earlier in this document) for their own planning and operational purposes.

Examples of data services within this category include:

- [Heidi Plus - our online business intelligence](#), benchmarking and analytics service. Heidi Plus, is utilised by 97% of HE institutions, and is widely used by Planning and other departments in HE providers to analyse and report on data from most HESA collections and other sources. Heidi Plus facilitates evidence-based organisational planning, efficiency performance and improving the student experience. The benchmarking capabilities it delivers enable HE providers to optimise their use of public funds and comply with requirements such as the Public Sector Equality Duty (Equality Act 2010) through review of data and publication of necessary information.
- Bespoke data and analytical reports for individual HE providers to support:
 - Research into new course provision,
 - Analysis to improve student access, experience and outcomes,
 - Analysis of compliance activities such as equality obligations or charter marks.
- Data visualisation and analytical products such as [Community Dashboards](#) (advanced, analytical dashboard suites available within Heidi Plus to HE providers) and analytical products (providing relevant and timely insights into the higher education sector).

Potential implications of not permitting these uses of data are:

- Less comprehensive information content of Heidi Plus, which would undermine the value it delivers to HE providers, increased operating costs in delivering it (through operation of a selective inclusion process).
- Restriction on availability of bespoke data requests for HE providers.
- Reduction in quality of analysis undertaken by HE providers and in the reliability of any conclusions drawn from reduced data.
- Significant increases in complex FOI requests made on HE providers.

Category 2 - Uses of data that are for the direct benefit of higher education sector bodies and organisations representing or serving HE providers

This category describes onward use of data where stakeholders in the higher education sector need comparable, consistent and quality assured data to ensure that reliable research and analysis underpins the services they supply to HE providers.

Examples of data services within this category include:

- Heidi Plus (provided recipient meets the access eligibility criteria).
- Data visualisation and analytical products.
- Bespoke data extracts and reports.

Examples of recipients include:

- Sector Agencies analysis, including analysis of equality and diversity monitoring, access arrangements and other activities.
- Employers' associations' and unions' analysis of staff data.
- Mission Groups' and sector representative bodies' analysis of policy and funding changes.
- Collaboration between sector agencies to develop products and services for HE providers.
- Access tracking consortia assessing impact of outreach activities (subject to such activity not being a statutory requirement).
- Membership and licencing subscription charge calculations.
- Professional, Statutory and Regulatory Bodies (PSRBs) undertaking analysis for course accreditation, workforce planning and professional standards monitoring directly affecting course provision by HE providers.
- Consultants working for HE providers.

Potential implications of not permitting these uses of data are:

- Reduction in quality of analysis undertaken by the above bodies and in the reliability of any conclusions drawn from reduced data.
- Inability to access such data would require organisations to seek information from other sources, including directly from HE providers.
- Significant increases in complex FOI requests made on HE providers.

Category 3 - Uses of data that are for the benefit of students and academic researchers

This category describes onward use of data including where HESA provides data directly to students and researchers to support and enable research and analysis of education.

Examples of data services within this category include:

- Data visualisations and analytical products.
- Bespoke data extracts and reports.

Examples of recipients include:

- Students for projects, dissertations and theses.
- Academic researchers for research into education, including learning gain, predictors of educational success, impact of disadvantage on access and progression, etc. (Some elements of this will be facilitated by the statutory inclusion within the ONS SRS, however it is unlikely to fulfil all requirements).

Potential implications of not permitting these uses of data are:

- Disruption to above listed applications of data.
- Significant increase in complex requests in FOI made on HE provider.

Category 4 - Uses of data that are for the benefit of students, prospective students and their representatives and graduate employers

This category describes onward use of data including where HESA provides data to organisations who use it to publish information for prospective students, develop products for the benefit of students and facilitate graduate recruitment.

Examples of data services within this category include:

- Data visualisations and analytical products.
- Bespoke data extracts and reports.

Examples of recipients include:

- League tables producers for league tables aimed at prospective students, their parents and advisers. League table producers use detailed HESA data to develop their own metrics for ranking and comparison of HE providers. League tables using HESA data include:
 - Times Good University Guide
 - Guardian University Guide
 - Complete University Guide
 - Times Higher Education World University Ranking.
- Comparison websites such as Which? University or Bestcourseforme which don't rank but provide a valuable service to students, mostly not for profit.
- Employers ensuring diversity of job applicants is representative of graduate populations,

- Private companies analysing data to inform graduate recruitment activities, e.g. targeting recruitment activities according to availability of graduates with appropriate skills and knowledge from HE providers.
- Private companies that provide services to students e.g. student loans.

Potential implications of not permitting these uses of data are:

- Disruption to above listed applications of data.
- Exclusion from League tables and/or a reduced opportunity for HE providers to collectively influence their design and to be confident that the League tables are based upon consistent standards and levels of quality.
- Significant increase in complex requests in FOI made on HE providers.

Category 5 - Uses of data that are essential or highly valuable for the activities of other public, private or third-sector organisations

This category describes onward use of data including where HESA provides data directly to public, private or third sector organisations focused on the HE sector to support their activities and decision making. This could include schools or other education providers regarding progression into HE, media companies researching articles, to organisations wanting to understand characteristics of the student market. All activity is subject to appropriate assessments as mentioned above.

Examples of data services within this category include:

- Data visualisations and analytical products.
- Bespoke data extracts and reports.

Examples of recipients include:

- Schools, colleges and other education providers researching progression into HE
- Press and media researching stories and articles about higher education.
- Research to understand characteristics of student customer markets, e.g. student accommodation developers and financial services providers.

Potential implications of not permitting these uses of data are:

- If HESA did not share information for these purposes these organisations would need to obtain information about HE providers by other means. They may request the information directly from HE providers via FOI.
- Inability of organisations in this category to utilise high quality, consistent data within their operational processes, may have direct or indirect consequences for their service users, HE providers and their students.

Category 6 – Provision of data to organisations that have a statutory power/function to collect data directly from higher education providers

This category describes onward use of data where HESA currently provides data to organisations who would/may otherwise collect the data directly from HE providers under their statutory powers/public functions.

Examples of data services within this category include:

- Bespoke data extracts and reports.
- Data visualisations and analytical products.

Examples of recipients include:

- Health Education England,
- General Medical Council,
- Government Departments (without a Secretary of State) and local government using evidence to support policy-making, resource planning, service planning, understanding of economic impacts of HE, effects on social mobility, etc.

QUESTIONS**We are interested in capturing your views to help us develop a new form of subscription agreement**

33. We are currently reviewing the future of the DDS preview system for high profile data requests.

Do you value and use the DDS preview system?

34. Would the presence of this or a similar system make you more likely to agree to opt in to onward data sharing?

35. Category 1 - Uses of data that are for the direct benefit of HE providers.

Do you agree in principle to data collected for Category 1 in respect of your provider being shared by HESA?

Yes

No

Unsure - If No or Unsure, please can you explain why?

36. Category 2 – Uses of data that are for the direct benefit of higher education sector bodies and organisations representing or serving HE providers

Do you agree in principle to data collected for Category 2 in respect of your provider being shared by HESA?

Yes

No

Unsure - If No or Unsure, please can you explain why?

37. Category 3 – Uses of data that are for the benefit of students and academic researchers

Do you agree in principle to data collected for Category 3 in respect of your provider being shared by HESA?

Yes

No

Unsure - If No or Unsure, please can you explain why?

38. Category 4 – Uses of data that are for the benefit of students, academic researchers, prospective students and their representatives and graduate employers.

Do you agree in principle to data collected for Category 4 in respect of your provider being shared by HESA?

Yes

No

Unsure - If No or Unsure, please can you explain why?

39. Category 5 – Uses of data that are essential or highly valuable for the activities of other public, private or third-sector organisations.

Do you agree in principle to data collected for Category 5 in respect of your provider being shared by HESA?

Yes

No

Unsure - If No or Unsure, please can you explain why?

40. Category 6 – Provision of data to organisations that have a statutory power/function to collect data directly from HE providers

Do you agree in principle to data collected for Category 6 in respect of your provider being shared by HESA?

Yes

No

Unsure - If No or Unsure, please can you explain why?

41. Within categories 1-6 above, are there any potential types of recipients or data services that you would not support and which you would like to see removed from one or more of the categories?

42. Do you have any further comments regarding onward use of data outlined or other uses not outlined above that you would like us to consider?

6 ADDITIONAL QUESTIONS

Within this consultation we have focussed on the activities directly related to our current service provision and statutory duties. Alongside these we are developing two major sector change programmes in Graduate Outcomes and Data Futures.

We take our role as a sector owned body seriously, offering opportunities to co-design our solutions and we always welcome feedback on our activities.

QUESTIONS

43. Data Futures: open commentary

As communicated on 12 March, Data Futures will not be going live in 2019/20. The team at HESA is working on a revised plan for delivering the student data collection for 2019/20. We will be working with the statutory customers to formalise plans and will provide further information in due course.

This is an opportunity to provide us with any feedback you want with regards the Data Futures Programme.

44. Graduate Outcomes: open commentary

The Graduate Outcomes Survey is in its inaugural year and we are working closely with the Graduate Outcomes Steering Committee to improve and develop the service to meet the needs of the sector.

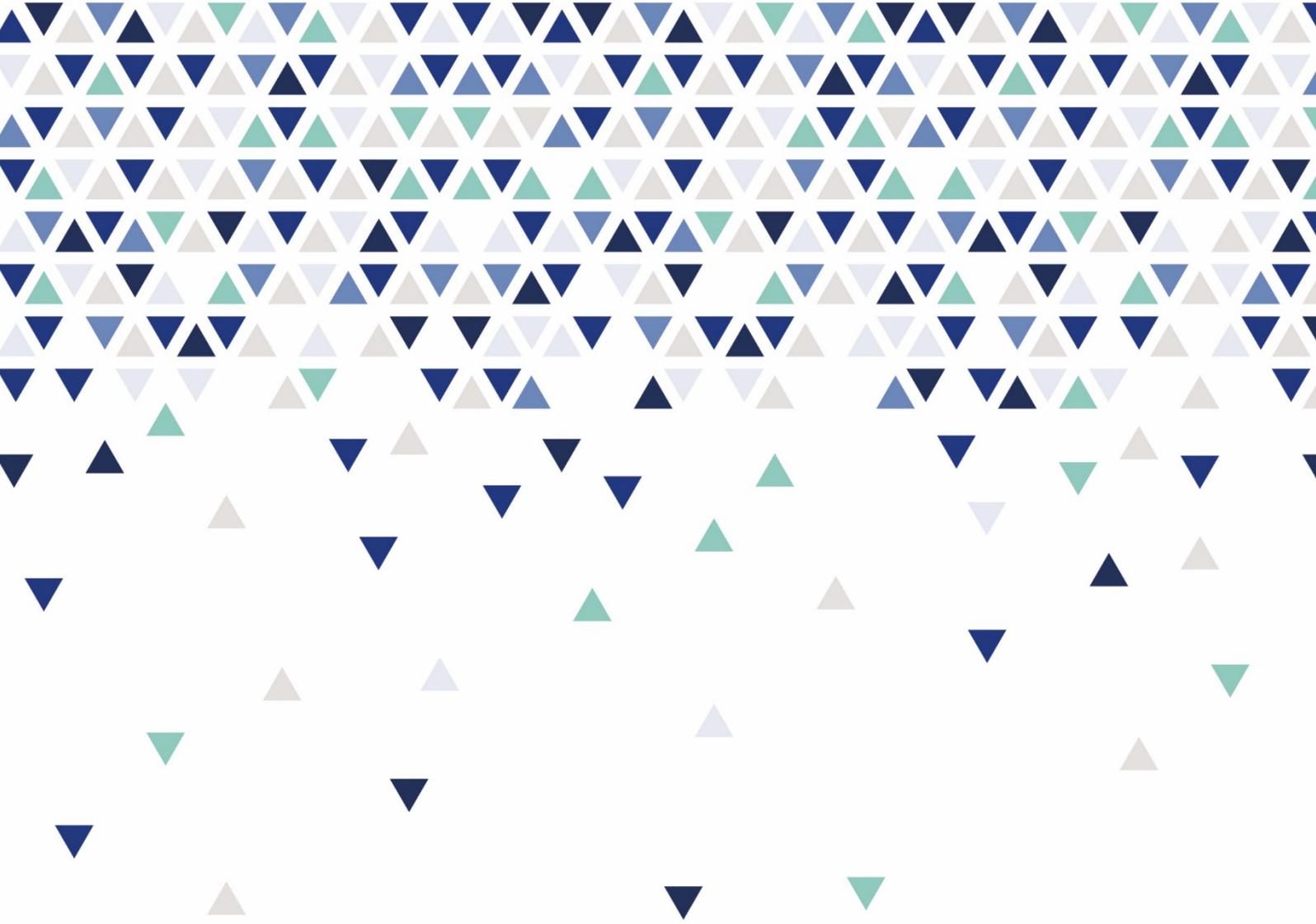
We would welcome any feedback that you would like to give regarding our Graduate Outcomes Programme.

45. As the breadth of support that HESA provides grows it is important to ensure that accurate contact details are held for a wider number of roles within HE providers. We would like to broaden the contact points we have within HE providers to include your Data Protection Officers. This would allow us to communicate more effectively regarding Data Protection issues.

Would you support HESA collecting contact details of your Data Protection Officer?

If you answered yes, please provide contact details below.

Are there any other 'roles' you consider it would be sensible for HESA to collect to make communications and processes more efficient?



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