

# AOR major review and Student record expansion England and Wales

## Overview

This consultation makes proposals which aim to ensure that HESA and our Statutory Customers have the necessary data to perform our functions in respect of students studying in transnational education (TNE) and through partnership arrangements. It proposes changes to data collection approaches for providers in England and Wales, which are intended to fill current gaps in our knowledge while ensuring that data requirements from higher education providers remain proportionate.

The change proposals set out in this consultation are intended for the 2025/26 collection year.

In developing the consultation proposals, we have worked alongside Statutory Customers, providers, sector representatives and member organisations to understand their requirements for the future collection of TNE and student data:

- The Office for Students (OfS), Higher Education Funding Council for Wales (HEFCW) and the General Medical Council (GMC) have identified changes to data collections which they intend to facilitate their regulatory functions, as described through this consultation document. In England, this consultation is being conducted under our statutory obligation as the Designated Data Body (as per Schedule 6 of HERA 2017) and compliant with the requirements of HERA s64(6). It also falls under **GMC's functions as defined by the Medical Act 1983** <[http://www.gmc-uk.org/-/media/documents/medical-act-1983\\_pdf-73285575.pdf](http://www.gmc-uk.org/-/media/documents/medical-act-1983_pdf-73285575.pdf)> . In Wales, this consultation is being conducted in line with HEFCW's obligations under Section 27 of the Higher Education (Wales) Act 2015.
- **A separate version of the consultation is intended for providers in Northern Ireland and Scotland** <[/data-innovation/aor-major-review-scotland-northern-ireland](#)> . For providers in Northern Ireland and Scotland, the proposals for the review of the Aggregate Offshore record aim to enhance the existing record and therefore continue with the submission of aggregate rather than individualised data. There are no proposals to expand the coverage of the Student record (for either partnership or TNE students) for providers in Northern Ireland and Scotland. Providers in Scotland and Northern Ireland are welcome to respond to this version of the consultation if they wish to provide feedback on the proposals for the submission of individualised data.

There are two aspects of this consultation:

1. **We are consulting on an expanded collection of data from providers in England and Wales about partnership arrangements with the aim of filling the current gap in our knowledge of students studying in the UK that are taught by the reporting provider or studying for an award of the reporting provider, but are not registered by the reporting provider nor any other provider that is required to report student data to either HESA or the Education Skills Funding Agency in the Individualised Learner Record (ILR). Throughout this consultation we refer to this expansion as one related to 'partnership students'.**
2. **We are conducting a major review of the Aggregate Offshore record (AOR) and consulting on the collection of data from providers in England and Wales about TNE students with the aim of filling the current gaps in our knowledge of these students. For example, in relation to the subjects that they study, the qualifications that they aim for and achieve, their patterns of study, and the identities and locations of organisations involved in the registration and delivery of these courses and corresponding awards. Throughout this consultation we refer to this expansion as one related to 'TNE students'.**

In summary, for providers in England and Wales we are making four proposals:

**Proposal 1:** To expand the Student record to collect data in respect of partnership students (as defined above)

**Proposal 2:** To expand the Student record to collect data in respect of TNE students, and to cease collection of the Aggregate Offshore record

**Proposal 3:** To make a small number of changes and additions to the Student record data model to accommodate efficient reporting and effective identification of the partnership and TNE student populations that we are proposing to now collect there

**Proposal 4:** To collect data in respect of partnership and TNE students either once or twice per year

This consultation will describe these proposals in detail and pose a series of questions in relation to each one in turn. There are also questions in relation to proposed changes to individual areas of the data model. Respondents are then invited to make a summative assessment of the collective impact of these proposals in the section titled 'Closing feedback'.

We welcome responses to this consultation from anyone with an interest in the data collected in relation to TNE or partnership arrangements involving UK higher education providers.

## Why your views matter

We will summarise and publish representative, anonymised comments from the responses to this consultation on the HESA website. This will include an explanation of how and why we and Statutory Customers have reached our decisions, and set out next steps on how we expect to implement any resulting data collection changes.

## Introduction

### Responses

To enable cross-organisational response, the consultation is grouped into subjects for different audiences to engage with. When you click 'next step' under each section, you will be returned to the contents page, which tracks your progress through the questions in each section.

The 'save later' option, also allows multiple users from one organisation to engage with the consultation. Once you click the 'save later' option you will receive a unique link.

Please ensure that you read all of the information supplied in each section before answering the questions.

Once the required questions have been completed, a 'Finish' button will appear at the bottom of the consultation. Pressing this will complete the consultation and send your responses for analysis. Please do not click through to finish until you are satisfied with all of your answers.

On completion, a copy of your responses will be generated as a PDF and sent to the email address you entered at the beginning of the consultation.

### Burden review assessment

In some areas we ask respondents to pick a preferred option from the choices given and complete an associated burden assessment for both the 'setup' and 'run' of these changes. This follows a methodology we have developed to support better understanding of the characteristics of data collection burden. Burden assessment questions are only relevant for HE providers that are or might be required to produce data, and other respondents may ignore these questions. Where burden assessments have been completed the scores will be interpreted alongside the chosen option. We therefore advise reviewing the associated burden before determining your preferred option.

Please contact our Liaison team at [liaison@hesa.ac.uk](mailto:liaison@hesa.ac.uk) or +44 (0)1242 388 531 if you have any questions.

### Data processing notice for consultations

Responses to this survey will be used to support the review of the Aggregate offshore record and Student Record, and will be used in analysis, documentation, and communications in connection with that activity.

We may share your survey responses with statutory customers, sector bodies or other organisations involved within the consultation. We will share your response together with your provider name however we will not disclose your name or email address to organisations we share responses with.

[Privacy information](https://www.hesa.ac.uk/about/website/privacy#016) <<https://www.hesa.ac.uk/about/website/privacy#016>>

#### 1 What is your name?

Name

#### 2 What is your email address?

Email

#### 3 What is your organisation?

*(Required)*

*Please select all that apply*

- English provider
- Scottish provider
- Welsh provider
- Northern Irish provider
- Other organisation
- Sector group/body
- Not applicable

**4** What is your organisation name?

Organisation

**5** What is your job role within the organisation?

**6** In what capacity are you responding to the survey?

*(Required)*

*Please select only one item*

- As a current, recent or prospective student at higher education provider
- To provide an official response on behalf of a higher education provider, organisation, or representative group
- In an individual capacity as an associate or employee of a higher education provider, organisation or representative group
- In any other individual capacity
- Prefer not to say

**7** Does your organisation currently submit data to the Aggregate Offshore record?

*(Required)*

*Please select only one item*

- Yes
- No

## Background to the consultation

The OfS, HEFCW and GMC have identified changes to data collections which they intend to facilitate their regulatory functions. The position of each body is summarised below. The key rationales that underpin these bodies' requirements are articulated for each proposal set out in this consultation.

HESA's Student record is an official data collection for higher education students studying in the UK. In England and Wales, this covers students who are either registered at regulated higher education providers or who are studying for an award of a regulated UK higher education provider, or are at a higher education provider funded by HEFCW. The coverage of the Student record for providers in England and Wales does not currently include students who are taught by the reporting provider or studying for an award of the reporting provider, but are not registered by the reporting provider nor any other provider that is required to report student data to either HESA or the Education Skills Funding Agency in the Individualised Learner Record (ILR).

HESA's annual Aggregate offshore record (AOR) is the current official data collection for students studying wholly outside the UK, who are either registered at UK higher education providers or are studying for an award of a UK higher education provider. However, there is growing evidence that the record offers an insufficiently rich picture of transnational (higher) education (TNE), including the existence of research projects that have collected additional data on UK TNE not available through the Aggregate offshore record, **such as that published by the Department for Business, Innovation & Skills in 2014** <[https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fgovernment%2Fuploads%2Fsystem%2Fuploads%2Fattachment\\_data%2Ffile%2F387910%2Fbis-14-1202-the-value-of-transnational-education-to-the-uk.pdf&data=05%7C01%7Cmelanie.ross%40jisc.ac.uk%7C5b059bb4b86247c7ac6908db5c739025%7C48f9394d8a144d2782a6f35f12361205%7C0%7C0%7C6382054236319](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fgovernment%2Fuploads%2Fsystem%2Fuploads%2Fattachment_data%2Ffile%2F387910%2Fbis-14-1202-the-value-of-transnational-education-to-the-uk.pdf&data=05%7C01%7Cmelanie.ross%40jisc.ac.uk%7C5b059bb4b86247c7ac6908db5c739025%7C48f9394d8a144d2782a6f35f12361205%7C0%7C0%7C6382054236319)> and an unpublished survey carried out by HEFCW and UnisWales in 2015, which used different categories to define types of TNE activity.

## The Office for Students (OfS)

In England, the OfS set out in its **response to the consultations on quality and standards conditions** <<http://www.officeforstudents.org.uk/publications/consultation-on-quality-and-standards-conditions-outcomes/>> and **approach to regulating student outcomes** <<http://www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/student-outcomes/>> that its **revised quality and standards initial and general ongoing conditions of registration apply to any higher education provided "by, or on behalf of, a provider"** <<https://www.officeforstudents.org.uk/media/0dc38475-3730-4173-88e7-42989be88262/revised-condition-b3-student-outcomes.pdf>>. This includes higher education provided to all of the students who are registered with a registered provider, taught by a registered provider, or studying for an award of a registered provider (or where these services are provided on a registered provider's behalf), and therefore encompasses UK-based and overseas activity.

The OfS has stated that it intends to construct indicators and measures in relation to transnational education courses in order to regulate quality for students on these courses, and to ensure that positive outcomes are delivered for these students, taking into account the context in which they are studying. As noted in its **response to the consultation on a new approach to regulating student outcomes** <<http://www.officeforstudents.org.uk/media/402f5f16-58e5-4018-b4d0-593db61a320b/regulating-student-outcomes-analysis-of-responses-reformatted.pdf>>, the OfS anticipates that it would be more likely to introduce measures of continuation and completion rather than measures of progression for TNE courses. The response also noted its intention to set appropriate numerical thresholds for those student outcomes once the data on TNE is sufficiently reliable, and will consult on these measures and the timeframe for their introduction separately in future. The OfS considers it likely that individualised rather than aggregate data is necessary in order to do this.

The OfS also has a duty under section 216 of the Education Reform Act 1988 to publish by statutory order a list of providers delivering courses in preparation for a degree to be granted by a provider that is authorised to award degrees. The OfS considers that it needs to fill the current reporting gap that exists for partnership students in order to do this.

## The Department for Education

The International Education Strategy published by the Department for International Trade and the Department for Education identifies the need to improve the accuracy and coverage of data on TNE, with a view to better understanding the value that the activity provides to the UK economy.

## The Higher Education Funding Council for Wales (HEFCW)

In Wales, HEFCW regulates the activity, including both overseas activity and activity taking place in the UK, of Welsh higher education providers on the basis that the obligations of the regulated provider extend to students for whom it is the awarding body, wherever and however they study. The Commission for Tertiary Education (CTER) will have regulatory oversight of post-16 education in Wales from 2024, including higher education, and in relation to quality, and will have different regulatory powers to those of HEFCW that may extend to TNE provision. Having a comprehensive individualised dataset for all provision is essential to its role.

HEFCW currently include data about TNE students in their National Measures and envisage that CTER (the successor body to HEFCW) will continue using data about TNE provision in the measures that they develop, including the possibility of measures relating to progression and outcomes for TNE students. HEFCW consider that individualised rather than aggregate data is necessary in order to better track student success. They argue that indicators and measures are required in relation to transnational education courses in order to regulate quality for students on these courses, and to ensure that positive outcomes are delivered for these students, taking into account the context in which they are studying.

## The General Medical Council

The General Medical Council (GMC) have a regulatory interest in detailed data on TNE for the purpose of adding these students to GMC data used for the regulation of undergraduate medical education.

The GMC will be launching a **Medical Licensing Assessment (MLA)** <<https://www.gmc-uk.org/education/medical-licensing-assessment>> in academic year 2024/25. UK medical students, including those at offshore franchises of UK medical schools, will need to pass the MLA as part of their medical school degree before they can join the medical register.

The GMC already receive HESA data on UK-based medical students and will be using this data to complete the undergraduate record for medical education. This data collection work falls under GMC's functions from the Medical Act 1983, which include promoting high standards of medical education and co-ordinating all stages of



medical education. The GMC require data on all medical students, including those at offshore franchises, to ensure thorough regulatory oversight of assessment.

The Department for the Economy Northern Ireland (DfE NI) and the Scottish Funding Council (SFC)

DfE NI and the SFC do not consider that they have a requirement for individualised data on TNE students. They are therefore proposing a different approach to the collection of this data than the one outlined in this consultation.

For providers in Northern Ireland and Scotland, proposals for the review of the Aggregate Offshore record are aimed at enhancing the existing record, which is to say continuing with the submission of aggregate-level data. There is a [separate consultation on the major review of the Aggregate Offshore record which is intended for providers in Northern Ireland and Scotland](#) *</data-innovation/aor-major-review-scotland-northern-ireland>* and gives further detail of the enhancement proposals supported by DfE NI and the SFC.

In addition, DfE NI and the SFC would welcome the views of providers in Northern Ireland and Scotland on the costs and benefits of submitting individualised data on TNE students. We would therefore encourage responses to this consultation on England and Wales from providers in Northern Ireland and Scotland as well.

## Proposal 1: expansion of the Student record to collect data about partnership students

To meet the requirements of the OfS and HEFCW in relation to partnership students, as set out in the background section of this consultation, we are proposing an expansion to the coverage of the Student record. This will include all students studying in the UK who are taught by the reporting provider or studying for an award of the reporting provider, where this provision is not already returned by another provider to HESA or to the Education Skills Funding Agency in the Individualised Learner Record (ILR). This is so that the quality and standards of all provision at providers can be monitored, whether the students are registered with, taught by, or studying for an award of a registered (OfS) or regulated (HEFCW) provider.

### OfS requirements

The [OfS's consultation on regulating quality and standards at OfS registered providers](http://www.officeforstudents.org.uk/publications/consultation-on-quality-and-standards-conditions-outcomes/) detailed its plan to monitor performance for courses delivered through partnership arrangements more effectively (both teaching and validation arrangements).

On 1 May 2022, the revised OfS quality and standards conditions came into effect. These conditions apply to higher education provided "by, or on behalf of, a provider", including students on courses delivered through partnership arrangements both within the UK and internationally. The OfS has stated that it requires accurate and timely data about the higher education delivered in partnership to effectively regulate the revised quality and standards conditions of registration.

In addition to these new regulatory requirements, the OfS has a duty under section 216 of the Education Reform Act 1988 to publish by statutory order a list of providers delivering courses in preparation for a degree to be granted by a provider authorised to award. The OfS considers that current data is insufficient for producing this list, because there is a significant delay between the collection and publication of the data, and it does not always provide a full description of all providers roles within a partnership. The OfS considers that these concerns could lead to the publication of inaccurate or incorrect information within a future statutory order.

Consequently, in order to effectively regulate the quality and standards of English higher education providers and to fulfil their duty to under section 216 of the Education Reform Act 1988, the OfS require data to be submitted about UK-based partnership students who are not already covered by the Student or Aggregate Offshore returns.

### HEFCW requirements

HEFCW require data to be submitted about UK-based partnership students who are not already covered by the Student record and won't be covered by the student record by 2024/25, in order to fulfil their requirements with regard to quality at higher education providers in Wales, under the Higher Education (Wales) Act 2015. It should be noted that most providers with specifically designated higher education courses, that do not currently return data to the HESA student record, will be doing so from 2023/24, and that all providers currently funded by HEFCW, including further education colleges, return data to the HESA student record.

### Proposal 1 summary

We therefore propose that a full Student record submission is required for students who meet the definition set out in the paragraphs above. This will involve the collection of additional data items needed to capture who is registering a student, who is the awarding body, and who is teaching the students. We describe these additions in more detail in the section of this consultation labelled 'Proposal 3: changes and additions to specific areas of the Student data model'.

### Alternative approaches

Alternative approaches have been considered in formulating this proposal. The data collection proposed here is considered essential for the risk-based approach to regulation taken by the OfS and HEFCW; were less data collected, these regulators would likely need to rely on other, more intrusive monitoring approaches, and it is judged that these would be likely to increase regulatory burden for providers. The following alternative approaches have been considered by the OfS and HEFCW in particular:

Not collecting information about partnership students. This would mean that the regulatory bodies would not be able to fulfil their statutory functions and duties, and that efforts to do so would therefore be partial or unable to set decisions or interpretations of student outcomes in their full context. The regulators judge that this would not ultimately be in the student interest.

Collecting information about partnership students via a separate data collection. This would create disproportionate burden for providers and other stakeholders, including HESA, as well as complexity for onward users of the data.

Collect less data in relation to partnership students through the Student data collection. At this stage, and given the significant developments in the sector, the regulators believe that any decisions that would be taken now on the data items included or excluded from a reduced set of data requirements would likely need to be revisited in the short or medium term as our understanding of future data requirements evolves. This would increase uncertainty and could lead to additional burden if the need to reintroduce requirements that had been previously removed emerged at a later date.

### Summary

The OfS and HEFCW are aware that this proposal has the effect of increasing the data reporting requirements for providers, and therefore the cost and burden of meeting the regulatory requirements. The regulators considered that this increase is appropriate to deliver key regulatory oversight in the student interest. They also anticipate that providers may encounter challenges in accessing data about partnership students if they do not have appropriate data sharing agreements in place to support sharing of this information in a way that is compliant with data protection legislation; where possible, the regulators would expect to provide appropriate guidance and support for providers to help address these challenges.

## Guidance on how to enter burden assessment summary scores

### SUMMARY ASSESSMENT – SETUP

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.	Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.	Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

### SUMMARY ASSESSMENT – RUN

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.	Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.	Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

#### Text version for Setup:

0: No impact

1-3: Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.

4-7: Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.

8-10: Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

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[Download the full burden assessment guide \(PDF\)](https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf) <<https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf>>

## 8 To what extent do you agree with the proposal to expand the coverage of the Student record to include data on partnership students?

*(Required)*

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

**9** Please complete your provider's burden assessment for expanding the coverage of the Student record to include data on partnership students

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**10** Please provide any contextual information to support your above answers, or any alternative approaches you think should be considered, in relation to the proposal to expand the coverage of the Student record to include data on partnership students

## Proposal 2: expansion of the Student record to collect data about TNE students

To meet the requirements of the OfS and HEFCW in relation to TNE students, as set out in the background section of this consultation, we are proposing to expand the coverage of the Student record to include all students studying through TNE arrangements, and to cease collection of the Aggregate Offshore record. Our proposal is for the submission of a reduced data set in relation to TNE students.

### OfS requirements

The [OfS's recent consultation on regulating quality and standards at OfS registered providers](http://www.officeforstudents.org.uk/publications/consultation-on-quality-and-standards-conditions-outcomes/) detailed their plan to monitor student outcomes for courses delivered through TNE arrangements. This included an intention to construct continuation and completion indicators and measures in relation to TNE courses, to help ensure that positive outcomes are delivered for these students.

### HEFCW requirements

HEFCW require data to be submitted about students on courses delivered through TNE arrangements to fulfil their requirements with respect to quality at higher education providers in Wales, including in order to be able to monitor progression and completion and develop indicators relating to TNE students. HEFCW currently include data about TNE students in their National Measures and envisage that the Commission for Tertiary Education and Research (CTER) (the successor body to HEFCW) will continue using data about TNE provision in the measures that they develop, including the possibility of measures relating to progression and outcomes for TNE students.

### Proposal

We therefore propose that the 2022/23 Student (Data Futures) data model is used as the starting point for an individualised TNE data model, both because a number of the required data items are already present, and so that the primary structure behind the two would be equivalent. However, we are proposing that many data items present in the Student (Data Futures) data model are removed when considering TNE students, resulting in a requirement for a reduced data set. This is because the regulators do not have a requirement to capture certain data for TNE students – including fields in relation to modules, fees and funding, and many of the personal characteristic data items. We describe the fields required as part of the TNE data model in more detail in the section of this consultation labelled 'Proposal 3: changes and additions to specific areas of the Student data model'.

For the avoidance of doubt, the proposal to expand the Student record to collect data about TNE students does not change the existing requirements in respect of students who are already included within the coverage of the Student record. For example, distance learning students who are studying outside the UK who are funded (such as Crown servants overseas and the Services) would remain in coverage of the Student record as they are currently (i.e. as a full return). More detail on the circumstances where a full return is required can be found in the [coverage of the Student record](https://codingmanual.hesa.ac.uk/22056/dataSpecification/Coverage).

### Alternative approaches

Alternative approaches have been considered in formulating this proposal. The data collection proposed here is considered essential for the risk-based approach to regulation taken by the OfS and HEFCW; were less data collected, these regulators would likely need to rely on other, more intrusive monitoring approaches, and it is judged that these would be likely to increase regulatory burden for providers. The following alternative approaches have been considered by the OfS and HEFCW in particular:

Not collecting information about TNE students at an individualised level and continuing to collect the existing Aggregate Offshore return. This would mean that the regulatory bodies would not be able to fulfil their statutory functions and duties, and that efforts to do so would therefore be partial or unable to set decisions or interpretations of student outcomes in their full context. The regulators judge that this would not ultimately be in the student interest.

Not collecting information about TNE students at an individualised level, and instead collecting an enhanced version of the Aggregate Offshore return which aimed to encompass the additional data requirements. We take the view that this would not be workable within the confines of an aggregate data model, because too much data would be required at a high level of granularity and we would ultimately be collecting individualised data.

Expanding the Student record to collect a full data set on TNE students. The regulators take the view that to do so would result in disproportionate burden for providers, and greater complexity in navigating data sharing and data protection considerations internationally. In particular, the regulators note that information about fees and funding is not relevant to TNE students, and we do not seek to collect or hold information that has no value for onward use. While the regulators acknowledge that information about the modules students study and the personal characteristics of individuals may have some value or interest for users, they do not consider that collection of this information proportionate. We are mindful of the regulators' responsibilities under the public sector equality duties, but consider that many of the student characteristics would not be meaningful if collected in respect of international students.

Collecting information about TNE students via a separate individualised data collection, whether using the same data model as set out in this consultation or a different one. This would create disproportionate burden for providers and other stakeholders, including HESA, as well as complexity for onward users of the data.

### Conclusion

The OfS and HEFCW are aware that this proposal has the effect of increasing the data reporting requirements for providers, and therefore the cost and burden of meeting the regulatory requirements. They recognise that there are additional complexities in collecting this data about TNE students given the diversity of provision operating across borders. The regulators considered that this increase is appropriate to deliver key regulatory oversight in the student interest. While they would also expect providers to have mechanisms in place to collect data about their partnerships already, they recognise that providers may encounter challenges in accessing data about TNE students if they do not have appropriate data sharing agreements in place to support sharing of this information in a way that is compliant with data protection legislation; where possible, the regulators would expect to provide appropriate guidance and support for providers to help address these challenges.

## Guidance on how to enter burden assessment summary scores

### SUMMARY ASSESSMENT – SETUP

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.	Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.	Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

### SUMMARY ASSESSMENT – RUN

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.	Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.	Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

#### Text version for Setup:

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8-10: Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

[Download the full burden assessment guide \(PDF\)](https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf) <<https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf>>

## 11 To what extent do you agree with the proposal to expand the coverage of the Student record to include data on TNE students?

*(Required)*

Please select only one item

- Strongly disagree
- Disagree
- Neither agree or disagree
- Agree
- Strongly agree



**12 Please complete your provider's burden assessment for expanding the coverage of the Student record to include data on TNE students**

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**13 Please provide any contextual information to support your above answers, or any alternative approaches you think should be considered, in relation to this proposal**

**Proposal 2 (continued): what are the different types of Transnational education (TNE) in the sector?**

To identify the requirements for an individualised TNE student data model, it is first necessary to consider the different types of TNE in the sector. Ensuring that we have a good understanding of the different types and approaches will help ensure that the data requirements are comprehensive, appropriate, and proportionate.

In the [AOR review definitions and scenarios](https://www.hesa.ac.uk/innovation/records/reviews/aggregate-offshore-return-review/definitions-scenarios) we step through our definitions for different types of TNE provision, and provide illustrative examples of how these types may interact. More detail on these definitions, how we arrived at them, and how we propose to integrate them into the data model can be found in the section in the consultation titled 'Proposal part 3 (continued): replacing the TYPE field', but a summary of these definitions is below.

**Programme types**

Independent programme: whereby a UK provider-owned course is delivered overseas by that provider. More information available in [AOR review definitions and scenarios](https://www.hesa.ac.uk/innovation/records/reviews/aggregate-offshore-return-review/definitions-scenarios) .

Partnership programme, whereby there is a collaborative arrangement between UK and overseas providers that is neither franchised nor validated

Franchised programme, whereby a UK provider-owned course is delivered by an overseas provider

Validated programme, whereby an overseas provider owned course is validated by a UK provider

**Types of venue**

International branch campus, which is a physical location overseas owned by a UK provider

Joint venture, which is a physical location overseas jointly owned by a UK and overseas provider

Partner campus, which is a physical location overseas owned by an overseas provider

**Distance learning**

- Distance learning overseas, whereby students are not in attendance at any physical location owned by a UK or overseas provider for the whole of the year  
We would ask consultation respondents to review the detailed [definitions and the scenarios](https://www.hesa.ac.uk/innovation/records/reviews/aggregate-offshore-return-review/definitions-scenarios) , and to use this as a basis for answering the following questions. This will help us to check whether we have understood all the different types of provision in the higher education sector and identify if there are any cases which sit outside of our proposed definitions.

**14** Do these scenarios accurately reflect TNE provision in your experience? For those completing a response on behalf of a provider, are the combinations of programme type and venue type ones that you recognise at your own provider?

*(Required)*

*Please select only one item*

- Yes
- No
- Partly
- Unsure

**15** Are the registration, delivery, and awarding arrangements as expected in each case?

*Please select only one item*

- Yes
- No
- Unsure

**16** Are you aware of any models of TNE provision that fall outside of these scenarios?

**17** To what extent would you agree that the proposed definitions provide a useful means of classifying TNE provision?

*(Required)*

*Please select only one item*

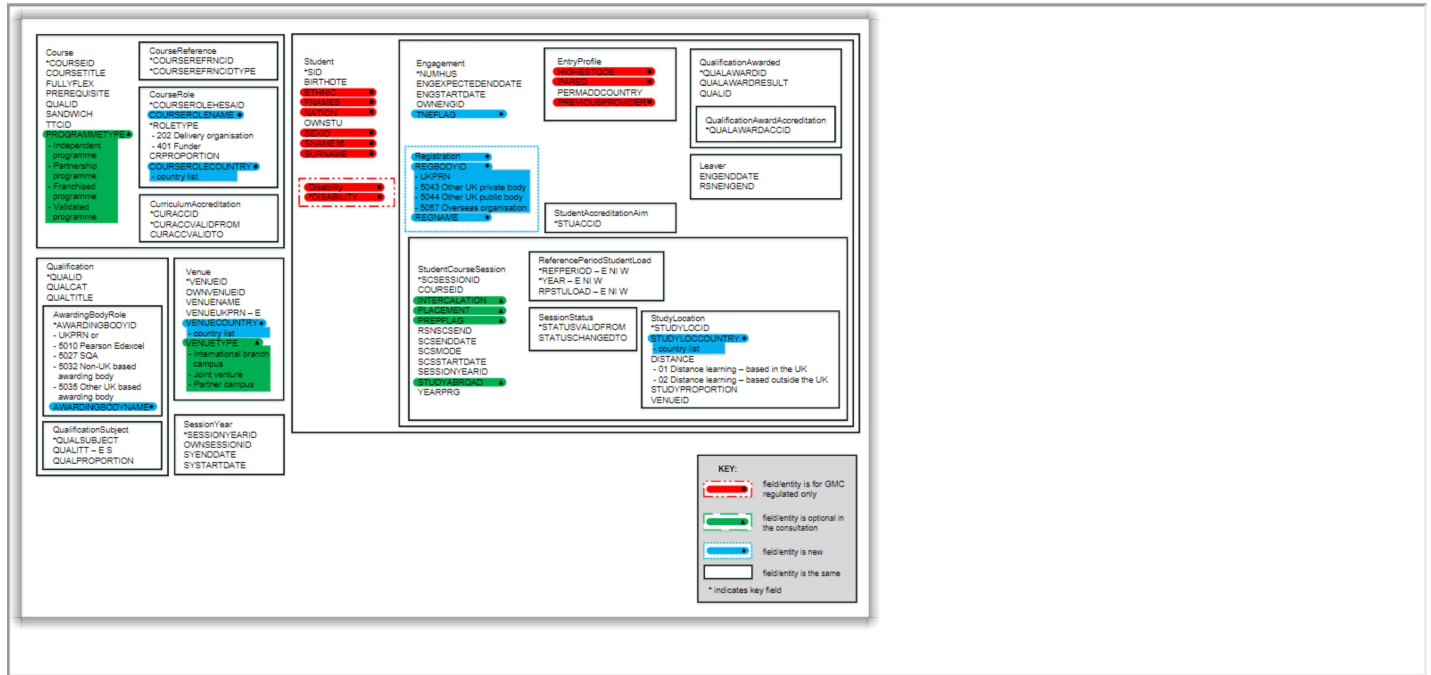
- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

**18** Please provide any contextual information to support your answer above, or any alternative approaches you think should be considered about collecting type data

### Proposal 3: changes and additions to specific areas of the Student data model

Below is the draft individualised data model we propose to implement from 2025/26 with respect to the expanded coverage of the Student record, as set out in the preceding proposals covering the collection of data on partnership students and TNE students. The 2022/23 Student (Data Futures) data model has been used as the starting point for this proposal.

We will refer to the proposed changes to the data model throughout the remainder of this consultation. Unless otherwise stated, we propose that it applies in respect of both partnership and TNE students. Other than the specific changes detailed in this section of the consultation, we propose that the specification and coding frame for each of the data items contained within the data model would remain unchanged from those currently published.



### New data items required for all students

There are number of mandatory data items in the proposed data model for 2025/26 onwards that we are proposing to collect for the first time in order to capture all the required data about partnership, TNE and other students.

The following sections step through each area of new data that is proposed in order to meet the regulators' requirements.

In proposing these new data items, we do not consider there to be viable alternative approaches. The data items being proposed to add are considered fundamental to the appropriate identification of the different types of partnership and TNE arrangements in the sector, and of the individual students studying in these. They aim to capture information about:

- Who the student is registered with: see 'Registration'.
- Who is awarding the student's qualification: see 'Awarding body'.
- Who is teaching the student, and where: see 'Course delivery'.
- Whether the student is studying via distance learning: see 'Distance learning'.

We consider that ease and consistency of identifying these populations is important to minimise the burden of reporting these students for providers, and to ensure onward users of the data share a common understanding of the populations they are looking at. This is likely to be of particular importance for use of the data for regulatory purposes.

### Registration

To capture who the student is registered with, the proposal is to add a new Registration entity that sits on the Engagement entity. This would be a repeating entity to collect the following data items:

- Registering organisation identifier.
- Name of the registering organisation.
- A UKPRN would be required for UK providers where possible, otherwise one of the generic codes would be returned. Where the generic code for an overseas organisation is used, the name of this overseas organisation must be returned as well.

#### Registration Status entity (\*NEW)

- Registration organisation identifier (REGBODYID): UKPRN or 5043 Other UK private body, 5044 Other UK public body, 5057 Overseas organisation.
- Name of the registering organisation (REGNAME): Free text field.

### Awarding body

To capture who is awarding the student's qualification, the proposal is to amend the HESA existing AwardingBodyRole entity to additionally collect the following data items:

Name of the awarding body.

Collection of the awarding body name, in addition to the existing identifier, is intended to provide information to supplement the awarding body identifier in cases where the awarding body is an overseas organisation. A UKPRN would be required for UK providers where possible, or a specific awarding body organisation, otherwise one of the generic codes would be returned. Where the generic code for an overseas organisation is used, the name of this overseas organisation must be returned as well.

This means the **AwardingBodyRole** <<https://codingmanual.hesa.ac.uk/22056/entity/AwardingBodyRole>> entity would now consist of the following fields:

AwardingBodyRole entity

Awarding body identifier (**AWARDINGBODYID** <<https://codingmanual.hesa.ac.uk/22056/AwardingBodyRole/field/AWARDINGBODYID>> ): UKPRN or 5010 Pearson Edexcel, 5027 SQA, 5032 Non-UK based awarding body, 5035 Other UK based awarding body.

Name of the awarding body (AWARDINGBODYNAME) (\*NEW): Free text field.

## Course delivery

To capture information on who is teaching the student, and where, the data model requires that information on a student's teaching provider is identified with respect to the course as a whole and for each year or period in which a student studied. The existing entities of CourseRole and Venue capture information at these points respectively. We propose to amend these existing entities.

To capture who is teaching the student, and where, for the course as a whole we propose to amend the existing CourseRole entity to additionally collect the following data items:

Name of the delivery organisation.

The country in which the course is being delivered.

This amendment would require the additional data items to be returned for the course only in cases when the role of a specified organisation is identified as that organisation being a delivery organisation for the student's course (in technical terms, when **CourseRole.ROLETYPE** <<https://codingmanual.hesa.ac.uk/22056/CourseRole/field/ROLETYPE>> is returned as 202 'Delivery organisation').

This means the **CourseRole** <<https://codingmanual.hesa.ac.uk/22056/entity/CourseRole>> entity would now consist of the following fields:

CourseRole entity

Delivery organisation identifier (**COURSESOLEHESAIID** <<https://codingmanual.hesa.ac.uk/22056/CourseRole/field/COURSESOLEHESAIID>> ) (also referred to as the teaching provider identifier): UKPRN or 5043 Other UK private body, 5044 Other UK public body, 5057 Overseas organisation.

Name of the delivery organisation (COURSESOLENAME) (\*NEW): Free text field.

Role of a specified organisation with respect to a student's course (**ROLETYPE** <<https://codingmanual.hesa.ac.uk/22056/CourseRole/field/ROLETYPE>> ): 202 Delivery organisation, 401 Funder.

Course role proportion (**CRPROPORTION** <<https://codingmanual.hesa.ac.uk/22056/CourseRole/field/CRPROPORTION>> ) (also referred to as the proportion of a student's course that is being taught by that provider): % (1dp).

Country in which the course is being delivered (COURSESOLECOUNTRY) (\*NEW): Country list.

## Venue

To capture who is teaching the student, and where, for each year or period in which a student studied, we propose to amend the existing Venue entity to additionally collect the following data items:

The country in which the venue is located.

This means the **Venue** <<https://codingmanual.hesa.ac.uk/22056/entity/Venue>> entity would now consist of the following fields:

Venue entity

Unique identifier for the venue at which the student is taught (**VENUEID** <<https://codingmanual.hesa.ac.uk/22056/Venue/field/VENUEID>> ): Free text field.

Provider's own identifier for the venue (**OWNVENUEID** <<https://codingmanual.hesa.ac.uk/22056/Venue/field/OWNVENUEID>> ): Free text field.

Postcode of the venue (**POSTCODE** <<https://codingmanual.hesa.ac.uk/22056/Venue/field/POSTCODE>> , UK venues only): Postcode field.

Name of the venue (**VENUENAME** <<https://codingmanual.hesa.ac.uk/22056/Venue/field/VENUENAME>> ): Free text field.

UKPRN of the venue (**VENUEUKPRN** <<https://codingmanual.hesa.ac.uk/22056/Venue/field/VENUEUKPRN>> , providers in England. only): UKPRN or 5043 Other UK private body, 5044 Other UK public body, 5057 Overseas organisation.

Country in which the venue is located (VENUECOUNTRY) (\*NEW): Country list.

For both the CourseRole and Venue entities, collection of the name of the delivery organisation or venue, in addition to the existing identifier(s), is intended to provide information to supplement the identifier in cases where it refers to an overseas organisation. Collection of the information on country is intended to both supplement the identifiers (for example, in cases where names may not be meaningful) and to support understanding the delivery of a course in its local context. The regulators consider the collection of this data important for their purposes, as well as being in the student interest.

## Distance learning

To capture whether the student is studying via distance learning, the proposal is to amend the existing StudyLocation entity to additionally collect the following data items:

Country of the study location.

This amendment would require the additional data item to be returned for the course only in cases when the distance learning marker is used to identify students based outside the UK who are studying via distance learning (in technical terms, when **DISTANCE** <<https://codingmanual.hesa.ac.uk/22056/StudyLocation/field/DISTANCE>> is returned as 02 'Distance learning – based outside the UK').

This means the **StudyLocation** <<https://codingmanual.hesa.ac.uk/22056/entity/StudyLocation>> entity would now consist of the following fields:

Study location entity

Study location identifier (**STUDYLOCID** <<https://codingmanual.hesa.ac.uk/22056/StudyLocation/field/STUDYLOCID>> ): Free text field.

Country of the study location (STUDYLOCCOUNTRY) (\*NEW): Country list.

Distance learning marker (**DISTANCE** <<https://codingmanual.hesa.ac.uk/22056/StudyLocation/field/DISTANCE>> ): 01 Distance learning - based in the UK, 02 Distance learning - based outside the UK.

Proportion of a student's course session that is being studied at the location (STUDYPROPORTION) (also referred to as the study proportion): % (1dp).

Unique identifier for the venue at which the student is taught (**VENUEID** <<https://codingmanual.hesa.ac.uk/22056/StudyLocation/field/VENUEID>> ): Free text field.

Collection of the information on country is intended to both supplement the identifier in cases where it refers to an overseas location and to support understanding the distance learning activity in its local context. The regulators consider the collection of this data important for their purposes, as well as being in the student interest.

If country were not added to the StudyLocation entity, an alternative approach would be to require a Venue entity for each location a student could be distance learning from. We do not consider this to be proportionate as it would be unnecessarily burdensome. Our proposed approach is instead aligned with the current approach for UK-based distance learning students in the Student data model.

## Guidance on how to enter burden assessment summary scores

### SUMMARY ASSESSMENT – SETUP

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.	Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.	Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

### SUMMARY ASSESSMENT – RUN

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.	Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.	Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

#### Text version for Setup:

0: No impact

1-3: Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.

4-7: Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.

8-10: Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

#### Text version for Run:

0: No impact

1-3: Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.

4-7: Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.

8-10: Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

[Download the full burden assessment guide \(PDF\)](https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf) <<https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf>>

## 19 To what extent do you agree with the proposal to add the Registration entity to the Engagement entity?

*(Required)*

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree



**20** Please complete your provider's burden assessment for returning data on who registers all students

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**21** Please provide any contextual information to support your above answers, or any alternative approaches you think should be considered, about collecting registration data

**22** To what extent do you agree with the proposal to amend the AwardingBodyRole entity to collect the awarding body name?

*(Required)*

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

**23** Please complete your provider's burden assessment for returning data on who awards the qualification to all students

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

24 Please provide any contextual information to support your above answers, or any alternative approaches you think should be considered, about collecting awarding body data

25 To what extent do you agree with the proposal to amend the CourseRole and Venue entities to collect course delivery data and country data in particular?

*(Required)*

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

26 Please complete your provider's burden assessment for returning data for all students on who delivers the course

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

27 Please provide any contextual information to support your above answers, or any alternative approaches you think should be considered, about collecting data on who delivers the course

**28** To what extent do you agree with the proposal to amend the StudyLocation entity to collect the country of study location?

*(Required)*

*Please select only one item*

Strongly agree

- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

**29 Please complete your provider's burden assessment for returning location data for distance learning students outside the UK**

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**30 Please provide any contextual information to support your above answers, or any alternative approaches you think should be considered, about collecting distance learning location data**

**Proposal 3 (continued): data item no longer required - PRINONUK field**

There is one data item that exists in the 2022/23 Student (Data Futures) data model that has been removed from the proposed data model for 2024/25 onwards.

Many of the data items collected within the existing data model can be considered to hold a degree of longevity that is often highly valued, and we recognise the importance of the stability this affords to providers and data users. However, we consider that it would be inconsistent with the principles of data collection to continue collecting information that is no longer necessary or meaningful for the purposes that the Student record needs to serve, for HESA, our Statutory Customers, or other data users. Removal of data items that have become redundant or obsolete represents good data governance and is intended to minimise the burden of data collection for providers.

**Primarily outside the UK**

For the 2024/25 data model we propose to remove the existing PRINONUK field. This field has been used to identify whether students who fall into coverage of the existing Student record (on the basis of them spending at least eight weeks in the UK during their course) were studying primarily outside the UK.

Please note that for 2023/24 the PRINONUK field will be moving from the StudyLocation entity to the Engagement entity (guidance has already been amended for 2022/23 to match this), so we are considering the field from this position.

Earlier in this section of the consultation we detailed the new collection requirements in relation to the venues and locations in which TNE and partnership students study, and in relation to identification of TNE students. We judge that these collection requirements would make the existing PRINONUK field redundant for 2024/25 onwards.

Removing the PRINONUK field would mean that it would no longer be required in respect of individuals in the existing Student record, nor for partnership or TNE students joining the record from 2024/25.

While this data item could be retained within the data model, alongside the additional data items, in the interests of consistency of data reporting over time, anecdotal feedback has been that the PRINONUK definition is difficult to work with and that it's not always clear for which record a student falls into coverage. Accordingly, we do not propose to do this.

**31 To what extent do you agree with the proposal to remove the PRINONUK field?**

*(Required)*

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

**32 If you would prefer to keep and revise the PRINONUK field, please explain your reasons for this**

**Proposal 3 (continued): new data item - TNE flag on Engagement entity**

There is one mandatory data item in the proposed data model for 2025/26 onwards that we are proposing to collect for the first time, in order to identify TNE students separately from UK-based students.

We consider that ease and consistency of identifying TNE students is important to minimise the burden of reporting these students for providers, and to ensure onward users of the data share a common understanding of the populations they are looking at. This is likely to be of particular importance for use of the data for regulatory purposes.

**Identifying TNE students**

To identify TNE students we propose to add a new data item that sits on the Engagement entity. This would clearly identify the students who are considered to be studying through TNE arrangements. The definition of a TNE engagement will be consistent with that set out in the coverage of the current Aggregate Offshore and Student records.

The field would consist of a single valid entry as a marker of a TNE engagement (01 Transnational education engagement). The proposal is to name the field TNEFLAG.

Collection of a marker to identify TNE students is intended to serve two key purposes. Firstly, it would indicate whether a provider is required to submit a full Student return for that student, or a reduced one, and support data validation processes in that regard. Secondly, it would enable onward users of the data to make informed decisions about the populations they wish to consider, for example, to include TNE students in certain populations for analysis and publication purposes.

As detailed previously, we consider a consequence of this proposal to be the opportunity to remove the reporting requirement for the PRINONUK field.



## Guidance on how to enter burden assessment summary scores

### SUMMARY ASSESSMENT – SETUP

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.	Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.	Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

### SUMMARY ASSESSMENT – RUN

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.	Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.	Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

#### Text version for Setup:

0: No impact

1-3: Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.

4-7: Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.

8-10: Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

#### Text version for Run:

0: No impact

1-3: Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.

4-7: Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.

8-10: Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

[Download the full burden assessment guide \(PDF\)](https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf) <<https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf>>

### 33 To what extent do you agree with the proposal to add a TNE flag to the Engagement entity to identify TNE students?

*(Required)*

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

**34** Please complete your provider's burden assessment for returning a TNE flag in the TNE data collection

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**35** Please provide any contextual information to support your above answers, or any alternative approaches you think should be considered, about collecting a flag field to identify TNE students

## Proposal 3 (continued): existing data items required for TNE students

As set out in the second overarching proposal, we propose that information about TNE students should be collected through the Student data collection.

The following sections step through the fields in the existing data model that we propose to include in the reduced data set for TNE students, alongside the new data items already proposed, in order to meet the regulators' requirements. The data items we are proposing to include in the return are considered fundamental to regulate quality for students on TNE courses, and to ensure that positive outcomes are delivered for TNE students, taking into account the context in which they are studying. They aim to capture information on:

The identifiers used for individual students: see Student identifiers.

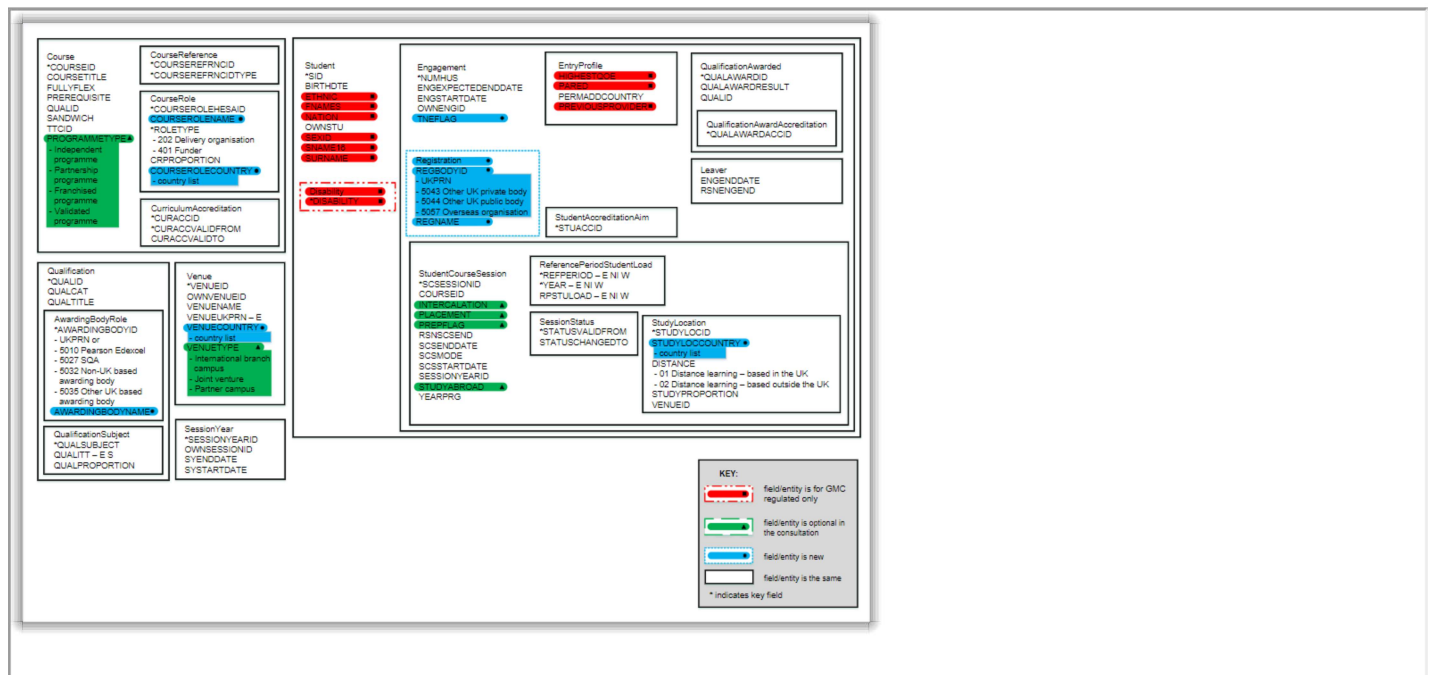
The personal characteristics of the students: see Personal characteristics data.

The course the students are studying on and the qualifications they are aiming for as part of their engagement: see Course and qualification data.

The activity being undertaken by the student as part of their engagement: see Engagement and student course session data.

The outcome of the student's engagement and the qualifications achieved: see Leaving data.

The draft data model can be used to understand the complete picture of all the fields proposed in the reduced return for TNE students.



### Student identifiers data

To ensure that students contribute appropriately to the populations and student outcome measures that are instrumental to the approaches of the regulators, it is important that individuals can be uniquely identified when they are returned by multiple providers or in related data sources (such as the GMC Register) and linked when they are included in successive years of Student data collections.

To be able to uniquely identify students and to link data across data collections we propose to collect the following data items for all TNE students:

A unique student identifier

A provider's own internal identifier for the student.

This means the proposed reduced return model would include the following student identifier data items:

Student entity

Unique student identifier (**SID** <<https://codingmanual.hesa.ac.uk/22056/Student/field/SID>> ).

Provider's own internal identifier for the student (**OWNSTU** <<https://codingmanual.hesa.ac.uk/22056/Student/field/OWNSTU>> ).

Please note that the regulators are not proposing to collect first and surnames for all TNE students. While these are normally of significant value for the purposes of linking students' data records, it has been judged that they would not normally provide a sufficiently robust basis for linking the records of overseas students. The exception here is considered to be the linking of a subset of the Student records to the GMC Register for the GMC's regulatory purposes, where it is imperative that names are accurately and consistently recorded in both sources. This requirement is discussed further in the 'Additional personal characteristics data required for GMC regulated students' section.

### Personal characteristics data

The regulators' approaches rely on understanding the provision delivered by a provider, and its student outcomes, in the context of its mix of students. This includes what and how they are studying and, for TNE students in particular, their geographical mobility. For example, there is a lot of interest in the movement of doctors and where they end up working relative to their home and medical school locations. To provide this context, the regulators have sought to understand a number of student and course characteristics using data items collected in the existing Student record.

The regulators propose that, when considering the TNE student population as a whole, it would be sufficient and meaningful to collect only the following personal characteristics data items:

The student's date of birth.

The country of the student's permanent home address on entry to their engagement.

The regulators consider that, in addition to the contextual value that these data items would provide in their own right, they are also likely to be helpful for supplementing a student record linking methodology which will primarily be based on the student identifiers discussed in the previous section.

This means the proposed model would include the following data items on personal characteristics data:

Student entity

Student's date of birth (**BIRTHDTE** <<https://codingmanual.hesa.ac.uk/22056/Student/field/BIRTHDTE>> ).

EntryProfile entity

Country of the student's permanent home address on entry to their engagement (**PERMADDCOUNTRY**

<<https://codingmanual.hesa.ac.uk/22056/EntryProfile/field/PERMADDCOUNTRY>> ).

Please note that while the regulators are mindful of their responsibilities under the public sector equality duties, they consider that many of the wider student characteristics collected in the existing Student record would not be meaningful if collected in respect of students based outside of the UK. This is, in large part, because the data in question uses terms and definitions specific to the UK environment. They also consider that it would be disproportionate to require collection of personal characteristics for all TNE students, at such scale and detail for the purposes of contextualisation, and that such evidence can normally be secured via alternative, less burdensome approaches.

The exception here is considered to be the range of personal characteristics data items which are required in respect of a subset of the TNE Student records, for the GMC's regulatory purposes. Understanding of these characteristics plays a more direct role in the GMC's processes, which it would be more burdensome to address through alternative approaches. We are therefore proposing to collect additional personal characteristic fields for GMC regulated TNE students. This requirement is discussed further in the 'Additional personal characteristics data required for GMC regulated students' section.

## Course and qualification data

The regulators' approaches rely on understanding a provider's higher education activity in respect of the courses that it provides across different qualification types, subject areas, and delivery models. It is therefore important that they are able to differentiate TNE students' activities into relevant categorisations on these bases – for example, to identify those individuals who are studying in undergraduate courses in certain subject areas separately from those studying other subjects. This allows the regulators' approaches to take appropriate account of structural differences in the design and delivery of higher education courses, and of differences in students' motivations for study and academic experiences. It also allows them to understand whether positive outcomes are delivered for these students, taking into account the context in which they are studying.

The proposal is to include the following data items on the Course, CourseReference, CurriculumAccreditation, Qualification and QualificationSubject entities within the return for TNE students:

Course entity

Course identifier (**COURSEID** <<https://codingmanual.hesa.ac.uk/22056/Course/field/COURSEID>> ).

Title of the course (**COURSETITLE** <<https://codingmanual.hesa.ac.uk/22056/Course/field/COURSETITLE>> ).

Marker of whether the course is fully flexible (**FULLYFLEX** <<https://codingmanual.hesa.ac.uk/22056/Course/field/FULLYFLEX>> ).

The level of course in relation to the qualifications normally required in order to gain entry to the course (**PREREQUISITE**

<<https://codingmanual.hesa.ac.uk/22056/Course/field/PREREQUISITE>> ).

Qualification identifier (**QUALID** <<https://codingmanual.hesa.ac.uk/22056/Course/field/QUALID>> ).

Marker for where the course has the option of a sandwich placement (**SANDWICH** <<https://codingmanual.hesa.ac.uk/22056/Course/field/SANDWICH>> ).

Marker for where the course is a teacher training course (**TTCID** <<https://codingmanual.hesa.ac.uk/22056/Course/field/TTCID>> ).

Course Reference entity

Course reference identifier (**COURSEREFRNCID** <<https://codingmanual.hesa.ac.uk/22056/CourseReference/field/COURSEREFRNCID>> ).

The type of course reference identifier (**COURSEREFRNCIDTYPE** <<https://codingmanual.hesa.ac.uk/22056/CourseReference/field/COURSEREFRNCIDTYPE>> ).

Curriculum Accreditation entity

Curriculum accreditation identifier (**CURACCID** <<https://codingmanual.hesa.ac.uk/22056/CurriculumAccreditation/field/CURACCID>> ).

The date from which the accreditation is valid (**CURACCVALIDFROM** <<https://codingmanual.hesa.ac.uk/22056/CurriculumAccreditation/field/CURACCVALIDFROM>> ).

The date to which the accreditation is valid (**CURACCVALIDTO** <<https://codingmanual.hesa.ac.uk/22056/CurriculumAccreditation/field/CURACCVALIDTO>> ).

Qualification entity

Qualification identifier (**QUALID** <<https://codingmanual.hesa.ac.uk/22056/Qualification/field/QUALID>> ).

Category of qualification (**QUALCAT** <<https://codingmanual.hesa.ac.uk/22056/Qualification/field/QUALCAT>> ).

Title of the qualification (**QUALTITLE** <<https://codingmanual.hesa.ac.uk/22056/Qualification/field/QUALTITLE>> ).

Qualification subject entity

Subject of qualification (**QUALSUBJECT** <<https://codingmanual.hesa.ac.uk/22056/QualificationSubject/field/QUALSUBJECT>> ).

Initial teacher training specialism of qualification (**QUALITT** <<https://codingmanual.hesa.ac.uk/22056/QualificationSubject/field/QUALITT>> , providers in England only).

Proportion of subject (**QUALPROPORTION** <<https://codingmanual.hesa.ac.uk/22056/QualificationSubject/field/QUALPROPORTION>> ).

## Engagement and Student course session data

To further enhance the regulators' understanding of whether positive outcomes are delivered for TNE students, taking into account the context in which they are studying, it is important to understand the details of the students' engagements and activity as they progress through their course. For example, to identify students studying at different intensities and by different modes of study, or to identify differences between a student's actual and expected end date. This allows the regulators' approaches to take appropriate account of structural differences in the design and delivery of higher education courses, and of differences in students' motivations for study and academic experiences.

The proposal is to include the following data items on the Engagement, StudentAccreditationAim, StudentCourseSession, ReferencePeriodStudentLoad, SessionStatus and SessionYear entities within the return for TNE students:

Engagement entity

Engagement identifier (**NUMHUS** <<https://codingmanual.hesa.ac.uk/22056/Engagement/field/NUMHUS>> ).

Expected end date of engagement (**ENGEXPECTEDENDDATE** <<https://codingmanual.hesa.ac.uk/22056/Engagement/field/ENGEXPECTEDENDDATE>> ).

Start date of the engagement (**ENGSTARTDATE** <<https://codingmanual.hesa.ac.uk/22056/Engagement/field/ENGSTARTDATE>> ).

Provider's own internal identifier for the engagement (**OWNENGID** <<https://codingmanual.hesa.ac.uk/22056/Engagement/field/OWNENGID>> ).

Student Accreditation Aim entity

Student accreditation aim identifier (**STUACCID** <<https://codingmanual.hesa.ac.uk/22056/StudentAccreditationAim/field/STUACCID>> ).

Student Course Session entity

Student course session identifier (**SCSESSIONID** <<https://codingmanual.hesa.ac.uk/22056/StudentCourseSession/field/SCSESSIONID>> ).

Course identifier (**COURSEID** <<https://codingmanual.hesa.ac.uk/22056/StudentCourseSession/field/COURSEID>> ).

The reason for the student course session ending (**RSNSCSEND** <<https://codingmanual.hesa.ac.uk/22056/StudentCourseSession/field/RSNSCSEND>> ).

End date of the student course session (**SCSENDDATE** <<https://codingmanual.hesa.ac.uk/22056/StudentCourseSession/field/SCSENDDATE>> ).

Mode of study for the student course session (**SCSMODE** <<https://codingmanual.hesa.ac.uk/22056/StudentCourseSession/field/SCSMODE>> ).

Start date of the student course session (**SCSSTARTDATE** <<https://codingmanual.hesa.ac.uk/22056/StudentCourseSession/field/SCSSTARTDATE>> ).

Session year identifier (**SESSIONYEARID** <<https://codingmanual.hesa.ac.uk/22056/StudentCourseSession/field/SESSIONYEARID>> ).

Year of programme of study for the student course session (**YEARPRG** <<https://codingmanual.hesa.ac.uk/22056/StudentCourseSession/field/YEARPRG>> ).

Reference Period Student Load entity

The reference period the student load applies to (**REFPERIOD** <<https://codingmanual.hesa.ac.uk/22056/ReferencePeriodStudentLoad/field/REFPERIOD>> ).

The year the student load applies to (**YEAR** <<https://codingmanual.hesa.ac.uk/22056/ReferencePeriodStudentLoad/field/YEAR>> ).

The full-time equivalence for the reference period (**RPSTULOAD** <<https://codingmanual.hesa.ac.uk/22056/ReferencePeriodStudentLoad/field/RPSTULOAD>> ).

Session Status entity

The date on which a student moves to a new status (**STATUSVALIDFROM** <<https://codingmanual.hesa.ac.uk/22056/SessionStatus/field/STATUSVALIDFROM>> ).

The status a student has moved to (**STATUSCHANGEDTO** <<https://codingmanual.hesa.ac.uk/22056/SessionStatus/field/STATUSCHANGEDTO>> ).

Session Year entity

Session year identifier (**SESSIONYEARID** <<https://codingmanual.hesa.ac.uk/22056/SessionYear/field/SESSIONYEARID>> ).

Provider's own internal identifier for the session year (**OWNSESSIONID** <<https://codingmanual.hesa.ac.uk/22056/SessionYear/field/OWNSESSIONID>> ).

End date of the session year (**SYENDDATE** <<https://codingmanual.hesa.ac.uk/22056/SessionYear/field/SYENDDATE>> ).

Start date of the session year (**SYSTARTDATE** <<https://codingmanual.hesa.ac.uk/22056/SessionYear/field/SYSTARTDATE>> ).

## Leaving data

The regulators' approach to ensuring that positive outcomes are delivered for TNE students will likely result in the introduction of measures of continuation and completion for TNE courses, it is therefore important to understand the outcomes of the students on such courses. For example, the qualifications achieved by students or the reasons for leaving their course. This allows the regulators' approaches to recognise where students may or may not be achieving positive outcomes and understand these in context.

The proposal is to include the following data items on the Leaver, QualificationAwarded and QualificationAwardAccreditation entities within the return for TNE students:

Leaver entity

End date of the engagement (**ENGENDDATE** <<https://codingmanual.hesa.ac.uk/22056/Leaver/field/ENGENDDATE>> ).

The reason for the engagement ending (**RSNENGEND** <<https://codingmanual.hesa.ac.uk/22056/Leaver/field/RSNENGEND>> ).

Qualification Awarded entity

Qualification awarded identifier (**QUALAWARDID** <<https://codingmanual.hesa.ac.uk/22056/QualificationAwarded/field/QUALAWARDID>> ).

The result of the qualification awarded (**QUALAWARDRESULT** <<https://codingmanual.hesa.ac.uk/22056/QualificationAwarded/field/QUALAWARDRESULT>> ).

Qualification identifier (**QUALID** <<https://codingmanual.hesa.ac.uk/22056/QualificationAwarded/field/QUALID>> ).

Qualification Award Accreditation entity

Accreditation identifier of the qualification awarded (**QUALAWARDACCID**

<<https://codingmanual.hesa.ac.uk/22056/QualificationAwardAccreditation/field/QUALAWARDACCID>> ).

## Guidance on how to enter burden assessment summary scores

### SUMMARY ASSESSMENT – SETUP

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.	Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.	Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

### SUMMARY ASSESSMENT – RUN

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.	Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.	Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

#### Text version for Setup:

0: No impact

1-3: Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.

4-7: Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.

8-10: Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

#### Text version for Run:

0: No impact

1-3: Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.

4-7: Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.

8-10: Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

[Download the full burden assessment guide \(PDF\)](https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf) <<https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf>>

### 36 To what extent do you agree with the proposal to collect the proposed student identifiers data for all TNE students?

Please select only one item

- Strongly agree  
 Agree  
 Neither agree or disagree  
 Disagree  
 Strongly disagree

### 37 Please complete your provider's burden assessment for returning the proposed student identifier data items for all TNE students

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



**38** Please provide any contextual information to support your above answers about the proposed student identifier data items for all TNE students

**39** To what extent do you agree with the proposal to collect the proposed personal characteristics data for TNE students?

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

**40** Please complete your provider's burden assessment for returning the proposed personal characteristics data for TNE students

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**41** Please provide any contextual information to support your above answers, about returning the proposed personal characteristics data.

**42** To what extent do you agree with the proposal to collect the proposed course and qualification data for all TNE students?

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

**43** Please complete your provider's burden assessment for returning course and qualification data on TNE students

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**44** Please provide any contextual information to support your above answers, about collecting course and qualification data for all TNE students

**45** To what extent do you agree with the proposal to collect the proposed Engagement and Student course session data for all TNE students?

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

**46** Please complete your provider's burden assessment for returning Engagement and Student course session data on TNE students

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**47** Please provide any contextual information to support your above answers, about collecting Engagement and Student course session data

**48** To what extent do you agree with the proposal to collect the proposed leaving data for all TNE students?

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

**49** Please complete your provider's burden assessment for returning leaving data on TNE students

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**50** Please provide any contextual information to support your above answers, about collecting leaving data

## Proposal 3 (continued): additional personal characteristics data required for offshore GMC regulated students

The GMC will be launching the **Medical Licensing Assessment (MLA)** <<https://www.gmc-uk.org/education/medical-licensing-assessment>> . UK medical students, including those at offshore franchises of UK medical schools, graduating from the academic year 2024-25 onwards, will need to pass the MLA as part of their medical school degree before they can join the medical register.

The GMC already receive HESA data on UK-based medical students and will be using this data for reporting on and evaluating undergraduate assessment, including the MLA. This work falls under GMC's functions from the Medical Act 1983, which include promoting high standards of medical education and co-ordinating all stages of medical education. The GMC require data on all medical students, including those at offshore franchises, to ensure thorough regulatory oversight of undergraduate medical education.

### Classification of the offshore medical schools

The GMC classify the offshore primary medical qualifications as the following, and would consider all of these as franchise programmes:

Newcastle University – **NUMed Malaysia course** <<http://www.ncl.ac.uk/numed/>>

Queen Mary University of London – **Medicine in Malta 5-year programme** <<http://www.qmul.ac.uk/undergraduate/coursefinder/courses/2022/medicine-malta-5-year-programme/>>

When these offshore franchised programmes are included in the main Student record, the GMC will be able to include the Assessment records from the students on these programmes in their Assessment collection. Currently they are excluded, as without the Student records, there is no data to link the records into UKMED, the GMC's research database. We understand from 2020/21 that schools removed these records from students on offshore programmes from their returns.

The inclusion of the franchised programme student data will ensure that UKMED holds complete records for all students on primary medical qualifications classified as UK and will therefore improve the completeness and utility of the database.

In order to meet its regulatory requirements, the GMC requires the following personal characteristics data items collected from the offshore primary medical qualifications listed above.

#### Fields required for matching to the GMC Assessment record <<http://www.hesa.ac.uk/collection/c21055>>

Field	Reason required
Student.BIRTHDTE	Required for matching cases to GMC Register. Required for calculating age at time of Applied Knowledge Test.
Student.FNAMES	Required for matching cases to GMC Register and GMC Assessment records to the Student records.
Student.OWNSTU	Required for matching cases to GMC Register. GMC receive student numbers as part of their registration process. This means the GMC number linked to OWNSTU is available to them for matching in HESA extracts. Also used for linking the GMC Assessment records to the Student records.
Student.SNAME16	Required for matching cases to GMC Register and GMC Assessment records to the Student records.
Student.SURNAME	Required for matching cases to GMC Register and GMC Assessment records to the Student records.

#### Fields required to report offshore MLA candidates in the same way as UK students and specifically to monitor attainment gaps <<http://www.gmc-uk.org/education/standards-guidance-and-curricula/projects/differential-attainment>>

Field	Reason required
Disability.DISABILITY	<b>Required for EDI reporting on the GMC progression reports and UKMED research</b> < <a href="https://www.ukmed.ac.uk/published_research">https://www.ukmed.ac.uk/published_research</a> > . GMC know they are associated with exam performance and need the data for analysis of MLA Applied Knowledge Test and other undergraduate assessments: see Further references 1, 2 and 3 at the bottom of this section. These relate to a <b>GMC corporate objective on differential attainment</b> < <a href="https://www.gmc-uk.org/education/standards-guidance-and-curricula/projects/differential-attainment">https://www.gmc-uk.org/education/standards-guidance-and-curricula/projects/differential-attainment</a> > .
Student.ETHNIC	<b>Required for EDI reporting on the GMC progression reports and UKMED research</b> < <a href="https://www.ukmed.ac.uk/published_research">https://www.ukmed.ac.uk/published_research</a> > . GMC know they are associated with exam performance and need the data for analysis of MLA Applied Knowledge Test and other undergraduate assessments: see Further references 1, 2 and 3 at the bottom of this section. These relate to a <b>GMC corporate objective on differential attainment</b> < <a href="https://www.gmc-uk.org/education/standards-guidance-and-curricula/projects/differential-attainment">https://www.gmc-uk.org/education/standards-guidance-and-curricula/projects/differential-attainment</a> > .
Student.NATION	Required for EDI reporting on the <b>GMC progression reports and UKMED research</b> < <a href="https://www.ukmed.ac.uk/published_research">https://www.ukmed.ac.uk/published_research</a> > .

Student.SEXID	<b>Required for EDI reporting on the GMC progression reports and UKMED research</b> < <a href="https://www.ukmed.ac.uk/published_research">https://www.ukmed.ac.uk/published_research</a> > .
EntryProfile.HIGHESTQOE	GMC report graduate entrants separately.
EntryProfile.PARED	<b>Required for EDI reporting on the GMC progression reports and UKMED research</b> < <a href="https://www.ukmed.ac.uk/published_research">https://www.ukmed.ac.uk/published_research</a> > .
EntryProfile.PERMADDCOUNTRY	Required for workforce planning reports. There is a lot of interest in the movement of doctors and where they finally end up working relative to home address and medical school address.
EntryProfile.PREVIOUSPROVIDER	<b>Required for UKMED research</b> < <a href="https://www.ukmed.ac.uk/published_research">https://www.ukmed.ac.uk/published_research</a> > .  GMC have used this in the past to get things like <b>APSFTE_ALEVA</b> < <a href="https://www.data.gov.uk/dataset/4ce0cee2-7bb6-4cdc-b9d0-3937a3bec68f/ks5-performance-tables/datafile/717b471c-21d2-41f7-98dd-d241fb7f67bb/preview">https://www.data.gov.uk/dataset/4ce0cee2-7bb6-4cdc-b9d0-3937a3bec68f/ks5-performance-tables/datafile/717b471c-21d2-41f7-98dd-d241fb7f67bb/preview</a> >  From <a href="https://www.data.gov.uk/dataset/4ce0cee2-7bb6-4cdc-b9d0-3937a3bec68f/ks5-performance-tables/datafile/717b471c-21d2-41f7-98dd-d241fb7f67bb/preview">https://www.data.gov.uk/dataset/4ce0cee2-7bb6-4cdc-b9d0-3937a3bec68f/ks5-performance-tables/datafile/717b471c-21d2-41f7-98dd-d241fb7f67bb/preview</a> < <a href="https://www.data.gov.uk/dataset/4ce0cee2-7bb6-4cdc-b9d0-3937a3bec68f/ks5-performance-tables/datafile/717b471c-21d2-41f7-98dd-d241fb7f67bb/preview">https://www.data.gov.uk/dataset/4ce0cee2-7bb6-4cdc-b9d0-3937a3bec68f/ks5-performance-tables/datafile/717b471c-21d2-41f7-98dd-d241fb7f67bb/preview</a> >  To put an applicant's A-level scores in context (i.e. compared to other student in their school)

GMC wanted to collect all the equivalent data items they receive now in the Student record for TNE students. In working to understand the requirements, there were a number of fields that were deemed inappropriate to include for TNE students. These are listed below with GMC's reasons for exclusion:

EntryProfile.CARELEAVER – this question would not mean the same to overseas students as the definitions are all UK based, so this wouldn't be appropriate to ask.

EntryProfile.PERMADDCPOSTCODE – this is not a concept overseas, so not relevant.

EntryProfile.SEC – only UCAS entrants are required to complete this field, so not applicable.

EntryProfile.SOC2010 / SOC2020 – only UCAS entrants are required to complete this field, so not applicable.

Student.CARER – this field is for providers in Wales and Scotland only, and as the two providers are in England, this won't be relevant.

Student.GENDERID (for E/NI/W) – this question would not mean the same to overseas students as the definitions are all UK based, and the disclosure of this data may expose the student to risk in some countries, so this wouldn't be appropriate to ask.

Student.UCASPERID and EntryProfile.UCASSCHEMECODE – these are only required for students who entered via UCAS and so not applicable.

Student.RELIGION – this question would not mean the same to overseas students as the definitions are all UK based, and the disclosure of this data may expose the student to risk in some countries, so this wouldn't be appropriate to ask.

Student.SEXORT – this question would not mean the same to overseas students as the definitions are all UK based, and the disclosure of this data may expose the student to risk in some countries, so this wouldn't be appropriate to ask.

Student.SSN – this is for students who apply for SLC funding, which isn't valid overseas, so not relevant.

Student.TRANS (for S) – this question would not mean the same to overseas students as the definitions are all UK based, and the disclosure of this data may expose the student to risk in some countries, so this wouldn't be appropriate to ask.

Further references

Murphy MJ, Dowell JS, Smith DT Factors associated with declaration of disability in medical students and junior doctors, and the association of declared disability with academic performance: observational study using data from the UK Medical Education Database, 2002–2018 (UKMED54) *BMJ Open* 2022;12:e059179. doi:10.1136/bmjopen-2021-059179.

Ellis R, Cleland J, Scrimgeour D, Lee A, Brennan P. The impact of disability on performance in a high-stakes postgraduate surgical examination: a retrospective cohort study. *Journal of the Royal Society of Medicine*. 2022;115(2):58-68. doi:10.1177/01410768211032573.

Ellis R, Brennan PA, Lee AJ, Scrimgeour DS, Cleland J. Differential attainment at MRCS according to gender, ethnicity, age and socioeconomic factors: a retrospective cohort study. *Journal of the Royal Society of Medicine*. 2022;115(7):257-272. doi:10.1177/01410768211079018.

## Guidance on how to enter burden assessment summary scores

### SUMMARY ASSESSMENT – SETUP

	0	1-3	4-7	8-10
Summary scores	No impact	Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.	Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.	Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

### SUMMARY ASSESSMENT – RUN

	0	1-3	4-7	8-10
Summary scores	No impact	Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.	Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.	Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

#### Text version for Setup:

0: No impact

1-3: Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.

4-7: Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.

8-10: Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

#### Text version for Run:

0: No impact

1-3: Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.

4-7: Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.

8-10: Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

[Download the full burden assessment guide \(PDF\)](https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf) <<https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf>>

## 51 To what extent do you agree with the proposal to collection the proposed personal characteristic data for TNE students on primary medical qualifications overseas?

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

**52** Please complete your provider's burden assessment for returning personal characteristic data for TNE students on primary medical qualifications overseas

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**53** Please provide any contextual information to support your above answers, or any alternative approaches you think should be considered, about collecting personal characteristic data from GMC regulated students



## Proposal 3 (continued): further optional data items - TYPE field

As set out in the second overarching proposal, on the expansion of the Student record to collect data about TNE students, we propose that a reduced data set should be submitted for these students as part of the Student data collection. The previous sections of this consultation have discussed a number of data items that would need to be added or retained within the proposed data model on a mandatory basis, for some or all TNE students. This section now considers data items where there is no requirement from the regulators to collect information on a mandatory basis, but for which we would like to understand providers' thoughts on supplying them on an optional basis.

### Replacing the TYPE field - optional

In this section of the consultation, we are concerned with the mechanisms included in the specification of the expanded Student record that could facilitate accurate identification of those definitions and scenarios. We consider it important that the data requirements used for this purpose are effective, while remaining proportionate for providers submitting the data and efficient for onward users of the data.

Please refer to the TNE [definitions and scenarios](https://www.hesa.ac.uk/innovation/records/reviews/aggregate-offshore-return-review/definitions-scenarios) <<https://www.hesa.ac.uk/innovation/records/reviews/aggregate-offshore-return-review/definitions-scenarios>> for further information on the proposed definitions for different programme and venue types within TNE provision, which are relevant to the discussion and proposals that follow.

### Background

As the **TYPE** <<https://www.hesa.ac.uk/collection/C21052/a/TYPE>> field in the existing Aggregate offshore record is an area that has been identified for improvement, we have been working to develop a revised set of definitions and a new approach to collecting this data that can be leveraged to improve its accuracy and utility. In doing so, we reviewed a number of historical approaches that had been taken to the categorisation and collection of such data:

In 2017, the British Council published [a common classification framework and data collection guidelines for international programme and provider mobility, or IPPM](https://www.britishcouncil.org/sites/default/files/tne_classification_framework-final.pdf) <[https://www.britishcouncil.org/sites/default/files/tne\\_classification\\_framework-final.pdf](https://www.britishcouncil.org/sites/default/files/tne_classification_framework-final.pdf)> (otherwise known as transnational education), using the following definitions of TNE provision:

- Independent provision
- Franchise programmes.
- International branch campuses.
- Self-study distance education.
- Collaborative provision
- Partnership programmes.
- Joint universities/colleges.
- Distance education with local academic partner.

In 2015, HEFCW and UnisWales carried out a survey of Welsh providers on TNE activity (unpublished), using the following definitions of TNE provision:

- Campus-based provision.
- Provision delivered at a partner institution – franchise programme.
- Provision delivered at a partner institution – other collaborative programme.
- Distance learning provision.
- Validation programmes.
- Any combination of the above types of provision.

In 2014, the Department for Business Innovation & Skills published [a research paper on The Value of Transnational Education to the UK](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/387910/bis-14-1202-the-value-of-transnational-education-to-the-uk.pdf) <[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/387910/bis-14-1202-the-value-of-transnational-education-to-the-uk.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/387910/bis-14-1202-the-value-of-transnational-education-to-the-uk.pdf)>, using the following definitions of TNE provision:

- Branch campuses and other forms of physical presence overseas by UK recognised bodies (including overseas institutions based on joint venture agreements).
- Distance/online learning provision (either unsupported or supported by an overseas partner).
- Collaborative provision offered in partnership with an overseas partner institution (whether students are registered with the UK or the overseas partner).

Our proposed definitions for updating the TYPE data are most closely modelled on work carried out by the British Council in 2017, within which they sought to define a common classification framework for international programmes. However, the proposals incorporate elements of alternative definitions used in certain circumstances by HEFCW and what was the Department for Business Innovation & Skills (for further information on these, see [definitions and scenarios](https://www.hesa.ac.uk/innovation/records/reviews/aggregate-offshore-return-review/definitions-scenarios) <<https://www.hesa.ac.uk/innovation/records/reviews/aggregate-offshore-return-review/definitions-scenarios>> ). This allows the specification we are proposing to facilitate an additional distinction between types of programme and location within TNE and more detailed and flexible collection of data on TNE provision.

These revised definitions will form the data requirements of the DfE NI and SFC, as outlined within the proposals for an enhanced aggregate data model. These proposals can be found in [the version of the consultation for providers in Northern Ireland and Scotland](https://www.hesa.ac.uk/innovation/aor-major-review-scotland-northern-ireland) <[/data-innovation/aor-major-review-scotland-northern-ireland](https://www.hesa.ac.uk/innovation/aor-major-review-scotland-northern-ireland)> .

### Proposals

The second overarching proposal, on the collection of data relating to TNE students, set out the importance of identifying the different types of TNE in the sector in order to identify the requirements of an individualised TNE student data model. There we set out a number of [definitions and scenarios](https://www.hesa.ac.uk/innovation/records/reviews/aggregate-offshore-return-review/definitions-scenarios) <<https://www.hesa.ac.uk/innovation/records/reviews/aggregate-offshore-return-review/definitions-scenarios>> for different areas of TNE provision, and invited respondents to comment on whether these were comprehensive and appropriate for identifying types of TNE in the sector.

The regulators take the view that the data items we have proposed to add to the Student data model for all students would facilitate the accurate and efficient identification of different types of TNE programme without the explicit collection of a programme type field. Specifically, the proposals to collect data in respect of the registration, awarding body, course delivery, and distance learning could be used to derive the different types of TNE programme described in the second proposal and in the TNE

**definitions and scenarios** <<https://www.hesa.ac.uk/innovation/records/reviews/aggregate-offshore-return-review/definitions-scenarios>> . The proposed derivation of TNE programme types is set out below:

Registration	Awarding Body	CourseRole 202 Delivery Organisation	What does this mean for type of provision?
Yes (or Yes plus others)	Yes (or Yes plus others)	Yes plus others	Partnership programme
Yes	Yes	Yes	Independent programme
Yes	Yes plus others	Yes	Partnership programme
Yes	Yes	No	Franchised programme
Yes	Yes plus others	No	Franchised programme
Yes	No	Yes	Partnership programme
Yes	No	No	Franchised programme
No	Yes	No	Validated programme
No	No	Yes	Partnership programme
No	Yes	Yes	Partnership programme
No	No	No	Not returned in the record

The regulators have confirmed that their priority is to collect sufficient data to facilitate the identification of the different types of TNE programme. They do not consider it essential that different types of TNE venue (such as international branch campuses and joint ventures) need to be identified distinctly. Consequently, none of the information we have proposed to collect in respect of the registration, awarding body, course delivery and distance learning is intended to support identification of the different types of TNE venue we described in the second overarching proposal and in the supplementary document on TNE scenarios and definitions. This approach is intended to limit the burden of the data requirements for providers.

While the Aggregate offshore record currently collects a data item (the TYPE field) that identifies different types of TNE programmes and venues explicitly, the regulators do not consider it strictly necessary that this is replicated in the expanded Student data model, in line with the de-prioritisation of information to identify TNE venues for their purposes. However, they acknowledge that explicit identification of both TNE programmes and venues through such a data item may be of general interest, or have greater value to other data users. In particular, one benefit of continuing to collect a data item that identifies all types of TNE provision explicitly for providers in England and Wales is that it would retain a consistent set of definitions across all four UK administrations, and ensure the ongoing UK-wide comparability of this data.

We consider that there are five options in respect of the data requirements for providers in England and Wales to identify different types of TNE provision, and are keen to hear feedback on which of these might be preferred by respondents:

### Option 1 – derivation only

Do not collect an equivalent to the TYPE field in the expanded Student record.

**Rely on the derivations** shown above to identify TNE programme types.

Do not make any attempt to define data requirements that would allow identification of TNE venue types.

The regulators consider this to be the lowest burden option that would meet their regulatory requirements.

### Option 2 – derivation and mandated venue types

Do not collect an equivalent to the TYPE field in the expanded Student record.

Rely on the derivations shown above to identify TNE programme types.

Introduce a **mandated** additional data item to identify TNE venue types.

This option would extend data requirements beyond those which are required by the regulators. We recognise that it would add value for the purposes of ongoing UK-wide comparability of types of TNE provision.

### Option 3 – derivation and optional venue types

Do not collect an equivalent to the TYPE field in the expanded Student record.

Rely on the derivations shown above to identify TNE programme types.

Introduce an **optional** additional data item to identify TNE venue types.

This option would extend data requirements beyond those which are required by the regulators. We recognise that it would add limited value for the purposes of ongoing UK-wide comparability if the optional basis for reporting this data meant partial coverage of providers or student groups.

#### Option 4 – mandate programme and venue types

**Mandate** collection of an equivalent to the TYPE field in the expanded Student record for all TNE students, to explicitly identify both TNE programme and venue types. This data item would be collected **in addition** to the changes and other additions to the Student data model already proposed in this consultation, which are intended to serve wider purposes than just identifying types of TNE provision.

This option would extend data requirements beyond those which are required by the regulators and consider this to be the highest burden option. We recognise that it would add value for the purposes of ongoing UK-wide comparability of types of TNE provision.

#### Option 5 – optional programme and venue types

Collect on an **optional** basis an equivalent to the TYPE field in the expanded Student record for TNE students, to explicitly identify both TNE programme and venue types. This data item would be collected **in addition** to the changes and other additions to the Student data model already proposed in this consultation, which are intended to serve wider purposes than just identifying types of TNE provision.

This option would extend data requirements beyond those which are required by the regulators. We recognise that it would add limited value for the purposes of ongoing UK-wide compatibility if the optional basis for reporting this data meant partial coverage of providers or student groups.

If options 2 to 5 were implemented, we would expect any equivalent to the TYPE field to utilise a revised set of definitions by comparison with those that have been used in the Aggregate offshore record to date; these definitions would be aligned with those proposed for providers in Northern Ireland and Scotland, as outlined in the background section above, and are set out below. The proposals comprise two additional fields – one in each of the Course and Venue entities – to flag the type of TNE programme and location:

##### Programme

Field	Course entity: PROGRAMMETYPE (*NEW)
Valid entries	Independent programme Partnership programme Franchised programme Validated programme

##### Location

Field	Venue entity: VENUETYPE (*NEW)
Valid entries	International branch campus Joint venture Partner campus

If options 4 or 5 were implemented, we would introduce both the PROGRAMMETYPE and VENUETYPE fields as additional data requirements on either a mandatory or optional basis respectively.

If options 2 or 3 were implemented, we would introduce only the VENUETYPE field as an additional data requirement on either a mandatory or optional basis respectively.

Draft definitions for the different types of programme and can be found in TNE [definitions and scenarios](#)

<[http://Proposal%203%20\(continued\):%20further%20optional%20data%20items%20for%20TNE%20students%20-%20TYPE%20field](http://Proposal%203%20(continued):%20further%20optional%20data%20items%20for%20TNE%20students%20-%20TYPE%20field)> . Data on distance learning in the individualised data model is covered in more detail in the section 'Proposal 3: changes and additions to specific areas of the Student data model'.

## Guidance on how to enter burden assessment summary scores

### SUMMARY ASSESSMENT – SETUP

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.	Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.	Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

### SUMMARY ASSESSMENT – RUN

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.	Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.	Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

#### Text version for Setup:

0: No impact

1-3: Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.

4-7: Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.

8-10: Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

#### Text version for Run:

0: No impact

1-3: Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.

4-7: Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.

8-10: Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

[Download the full burden assessment guide \(PDF\)](https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf) <<https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf>>

**54** Do you have any comments on the derivation for types of TNE provision proposed above?

**55** Which of the five options detailed above would be your preference for identifying different types of TNE provision?

*(Required)*

*Please select only one item*

- Option one: derivation only
- Option two: derivation and mandated venue types
- Option three: derivation and optional venue types
- Option four: mandate programme and venue types
- Option five: optional programme and venue types
- None of the above
- Any of the above, I do not have a preference

**56** Please explain the reasons for your preference, and any alternative approaches you think should be considered for collecting programme and venue type data

**57** Please complete your provider's burden assessment for returning data on programme and venue types for your TNE provision

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**58** Please provide any contextual information to support your above answers about collecting programme and venue type data

## Proposal 3 (continued): further optional data items - Activity data

We have set out above the course and qualification, and student course session, data items that we propose will be required on a mandatory basis within the reduced Student record return for TNE students. This included collection of course attributes such as the sandwich course marker.

There are a number of existing data items that describe other course attributes, and specifically the activities of students with respect to those course attributes, which we have not proposed to include in the data return requirements. The regulators would like to understand whether these are data items that providers are able, or would like, to return. Although there isn't a strong requirement for them, they consider that these data items could help them and other users with building a richer picture of the activity being undertaken by TNE students at different stages of their course, by providing more detail on the courses students are on. It could also help to explain differences in students' outcomes (in particular their completion outcomes or employment destinations) and provide additional contextual information about these types of provision.

We consider that the relevant activity data items identify whether:

The student course session includes a sandwich placement (not including statutory clinical placements) (**StudentCourseSession.PLACEMENT**

<<https://codingmanual.hesa.ac.uk/22056/StudentCourseSession/field/PLACEMENT>> ).

The student undertook a preparatory phase in the first student course session of their course, in order to gain access to the course (**StudentCourseSession.PREPFLAG**

<<https://codingmanual.hesa.ac.uk/22056/StudentCourseSession/field/PREPFLAG>> ).

The student is studying abroad during the student course session (**StudentCourseSession.STUDYABROAD**

<<https://codingmanual.hesa.ac.uk/22056/StudentCourseSession/field/STUDYABROAD>> ).

Students on courses in medicine, as well as those in dentistry or veterinary sciences have taken time out during the student course session to study for a qualification or credit that does not count towards their main qualification, with the intention to return to their main programme on completion of the second one

(**StudentCourseSession.INTERCALATION** <<https://codingmanual.hesa.ac.uk/22056/StudentCourseSession/field/INTERCALATION>> ).

## Guidance on how to enter burden assessment summary scores

### SUMMARY ASSESSMENT – SETUP

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.	Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.	Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

### SUMMARY ASSESSMENT – RUN

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.	Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.	Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

#### Text version for Setup:

0: No impact

1-3: Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.

4-7: Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.

8-10: Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

#### Text version for Run:

0: No impact

1-3: Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.

4-7: Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.

8-10: Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

**Download the full burden assessment guide (PDF)** <<https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf>>

**59** Which, if any, of these data items do you consider that it could be worthwhile to collect within the Student record for the purposes of gaining contextual information about TNE student? Please select any you would consider worthwhile to supply

*Please select all that apply*

- StudentCourseSession.PLACEMENT
- StudentCourseSession.PREPFLAG
- StudentCourseSession.STUDYABROAD
- StudentCourseSession.INTERCALATION
- None of the above

**60** Do you consider that it would be feasible for your provider to return data on these items for TNE provision? Please select any you would be able to supply

*Please select all that apply*

- StudentCourseSession.PLACEMENT
- StudentCourseSession.PREPFLAG
- StudentCourseSession.STUDYABROAD
- StudentCourseSession.INTERCALATION
- None of the above

**61** Please explain the reasons why you think that collection of activity data (including the Placement field, Preparatory and Study Abroad flags and Intercalation field) would or would not be worthwhile or feasible

**62** Please complete your provider's burden assessment for returning the Placement, Preparatory, Study Abroad and Intercalation flags for TNE students

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



**63** Please provide any contextual information to support your above answers, about collecting activity data

**Proposal 4: Timing of the expanded Student Return**

The current Aggregate offshore record is collected once per year, covering the traditional HESA reporting period of 1 August until 31 July. From 2024/25, the Student record will be collected twice per year as two discrete data collections; the first reference period 1 August until 1 December and the second reference period 2 December until 31 July.

While the regulators do not yet have a fixed view of the timing requirements for submitting an expanded Student record that includes partnership and TNE students, they consider that it will be necessary to align timings for each of the proposed expansions with one of these two approaches. If the data was only collected once a year, we consider it would represent a separate data model for the data on partnership and TNE students as from 2024/25 the Student return model and HESA's data collection systems would be aligned to two discrete collections. We consider trying to accommodate the two different timing requirements into a single model and collection would add complexity and burden to the data reporting process.

The regulators are keen to hear feedback on the feasibility, opportunities and challenges for the timing of the collections.

**Guidance on how to enter burden assessment summary scores**

**SUMMARY ASSESSMENT – SETUP**

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.	Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.	Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

**SUMMARY ASSESSMENT – RUN**

	0	1-3	4-7	8-10
<b>Summary scores</b>	No impact	Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.	Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.	Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

**Text version for Setup:**

0: No impact

1-3: Almost no change to processes or systems. Can be fitted into business as usual against a known release window. Limited training or guidance required.

4-7: Minor to medium changes to systems and processes. Difficult to resource. Date for go-live sub-optimal. Requires bespoke training.

8-10: Significant change to systems and/or processes. Detrimental impact on ability to do other activities. Cannot be serviced from existing capacity. Release date very challenging. Requires training / re-skilling.

**Text version for Run:**

0: No impact

1-3: Business as usual (BAU). Operated through processes and systems. No discernible impact on current operating model.

4-7: Increased resources. Sustained opportunity cost. Complexity in planning. Requires specialist support.

8-10: Sustained increased resources required. Conflict with other business priorities. Cannot be systemised - lots of manual checking. Requires subject matter expert (SME).

[Download the full burden assessment guide \(PDF\)](https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf) <<https://www.hesa.ac.uk/files/Burden%20Assessment%20Guide.pdf>>



**64** On which frequency do you consider that it would be feasible for your provider to submit the full Student record return proposed for partnership students?

*(Required)*

*Please select only one item*

- We could only submit partnership student data once a year, covering 1 Aug – 31 Jul period
- We could submit partnership student data twice a year, to fit in with the Student record timescales
- We could submit partnership student data either once or twice a year
- Not applicable

**65** On which frequency do you consider that it would be feasible for your provider to submit the reduced Student record return proposed for TNE students?

*(Required)*

*Please select only one item*

- We could only submit TNE student data once a year, covering 1 Aug – 31 Jul period
- We could submit TNE student data twice a year, to fit in with the Student record timescales
- We could submit TNE student data either once or twice a year
- Not applicable

**66** Please provide any contextual information to support your answers about collecting partnership and TNE student data once or twice per year. If you think that there are particular opportunities or challenges associated with either of these timing requirements, please explain these, and any alternative approaches you think should be considered

**67** Please complete your provider's burden assessment for submitting partnership student data once a year

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**68** Please complete your provider's burden assessment for submitting partnership student data twice a year

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**69** Please complete your provider's burden assessment for submitting TNE student data once a year

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**70** Please complete your provider's burden assessment for submitting TNE student data twice a year

	0	1-3	4-7	8-10
Setup <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Run <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Closing feedback**

**71** Do you have any other comments on the collection method of the data?

72 Do you have any other comments about this consultation?

## Appendix: Matters to which OfS have had regard in reaching the proposals

In setting out its requirements to HESA which resulted in the formulation of these proposals, the OfS has had regard to a number of matters. These are described through this annex.

### The codes of practice for higher education data collections

In developing its requirements, the OfS has had regard to both the [demand-side code of practice for higher education data collections, and the supply-side on <http://www.hesa.ac.uk/innovation/data-landscape/Codes-of-practice> e](http://www.hesa.ac.uk/innovation/data-landscape/Codes-of-practice). It considers that the principles of Rigour are particularly relevant on both the demand and supply sides, and the Honesty and Impartiality principles are also relevant on the demand side.

It has sought to develop a data collection approach that defines the data request on its merits and seeks the best evidence available for the requirement at a proportionate cost in terms of the burden of data collection for providers. It has considered the use cases provided by the regulators of higher education providers in England and has sought to develop standardised data definitions that would minimise the risks of duplication of existing data collection activity.

### The OfS's general duties

In developing its requirements, the OfS has had regard to its general duties as set out in [section 2\(1\) of HERA <https://www.legislation.gov.uk/ukpga/2017/29/contents/enacted>](https://www.legislation.gov.uk/ukpga/2017/29/contents/enacted). This consideration has therefore contributed to the development of these proposals. It considers that the proposals in this consultation are particularly relevant to general duties (a), (b) and (g), which relate to the need to protect the institutional autonomy of English higher education providers; quality, choice and opportunities for students; and the principles of best regulatory practice, including the principles that regulatory activities should be transparent, accountable, proportionate and consistent.

The OfS's regulatory objectives reflect the things that are important to all students: high quality courses, positive outcomes, and the ongoing value of their qualifications. In setting out its requirements, the OfS has sought to align development of the student data collections for partnership and TNE students with the recent changes it has made to regulation of quality and student outcomes, through conditions of registration B1, B2, B3, B4 and B5. The proposals are considered appropriate to support a consistent, comprehensive and transparent approach to regulation of quality and student outcomes for the benefit of providers and students.

As well as providing necessary information for its regulatory purposes, the OfS considered that its requirements would result in information being collected that may support individual providers' quality improvement or enhancement activities. It has therefore sought to develop requirements that have a proportionate impact on the data reporting burden on providers. It does not consider that the proposals would impinge on the institutional autonomy of English higher education providers.

### Public Sector Equality Duty

The OfS has had regard to: schedule 1, paragraph 21 of HERA, which extends the Equality Act 2010, and therefore the Public Sector Equality Duty, to the OfS. Compliance with the Public Sector Equality Duty requires the regulators to have due regard to the need to eliminate unlawful discrimination, foster good relations between different groups and take steps to advance equality of opportunity.

The OfS has considered whether there may be any tension between the consultation proposals in relation to student data collection and equality matters. Its view is that it is seeking to expand the student data collections to be more comprehensive in coverage of student groups, including those who share protected characteristics, with a view to better understanding the outcomes and experiences of those groups through onward use of the data in its regulatory processes. It considers that improved understanding of those student groups, including through the availability of more information for individual providers to support their quality improvement or enhancement activities, is likely to have a positive impact on equality. If a subset of students, particularly those who share protected characteristics, is not identifiable within student data collections, their outcomes and experiences may be less well understood by providers seeking to improve.

When identifying the student characteristics data items to be included in the reduced return that it has proposed to collect for TNE students, the OfS has been mindful of its obligations in respect of the Public Sector Equality Duty. However, it has needed to balance these interests against the likelihood of collecting meaningful data through an approach that represents proportionate burden. While this means that fewer student characteristics have been proposed for collection than might be desirable if the Public Sector Equality Duty were to be prioritised above all else, the OfS considers that relevant information can normally be secured via alternative, less burdensome approaches through the course of its risk-based regulatory approaches.

The OfS will continue to have due regard for its obligations under the Equality Act 2010, as we consider responses to this consultation.

### The Regulators' Code

In developing its requirements, the OfS has had regard to [the Regulators' Code <https://www.gov.uk/government/publications/regulators-code>](https://www.gov.uk/government/publications/regulators-code). Section 1 of the code is particularly relevant: 'Regulators should carry out their activities in a way that supports those they regulate to comply and grow'.

Paragraph 1.1 requires regulators to have due regard for avoiding the imposition of 'unnecessary regulatory burdens through their regulatory activities'. Throughout the proposals, explanations have been provided for why this particular approach to expanded student data collection is being proposed and why it is the lowest burden solution considered to achieve the regulators' aims.

### Guidance issued by the Secretary of State

The OfS has had regard to the matters set out in the [Secretary of State's guidance to the OfS dated March 2022 <http://www.officeforstudents.org.uk/advice-and-guidance/regulation/guidance-from-government/>](http://www.officeforstudents.org.uk/advice-and-guidance/regulation/guidance-from-government/). It considers that the points relating to quality are particularly relevant to our proposals.