

## OfS expectations of Jisc's delivery of the in-year data programme

1. In January 2025, we confirmed that the Office for Students (OfS) would take forward the collection of in-year student data, together with Jisc, the Scottish Funding Council, Medr and the Department for the Economy for Northern Ireland.
2. Our strategic aim is to have the right data, at the right time and in the right way, which is essential to enable higher education institutions to operate effectively, and for robust and timely regulation. We want to ensure that providers and the OfS are equipped with more timely data and insights to improve the potential for interventions by either party to have a positive and meaningful impact on student experiences of, and outcomes from, higher education. The potential benefits the OfS anticipates the introduction of in-year student data collection could realise are set out at Annex A.
3. This document sets out, in broad terms, the OfS's expectations of Jisc, the designated data body (DDB), for delivery of the programme to introduce in-year student data collection. It supplements the 'OfS Statement of Expectations of the DDB' to detail expectations specific to this programme of work. For the avoidance of doubt, the OfS expects that Jisc will adhere in full to the expectations set out in that statement (in particular, paragraphs 26 to 34), whether additional to or underpinning those described here.

### Expectations of in-year programme delivery parameters

4. The OfS expects Jisc to develop a UK-wide sustainable approach and efficient system for in-year student data collection that minimises burden on providers, and enables publication and sharing of robust and timely data products and services. This should include sharing with non-statutory customers (such as PSRBs) to enable burden minimisation through the reduction in separate data requests flowing to providers from such bodies.
5. As an enabler of burden minimisation, the systems and specifications implemented by the programme should be adequately future-proofed to known policy developments, such as the government's implementation of the Lifelong Learning Entitlement (LLE). The programme should aim to ensure Jisc and its statutory customers have confidence – within reason – that those systems are then flexible enough to accommodate continual evolution of the data landscape over the longer term.
6. The student collection should initially include two reference periods (one being the existing end of year annual collection), but with an assumption that England (and any other statutory customers that want to implement) will require an increase to three within or shortly after the planned programme timescales unless significant reason is found to not implement. The design must ensure that the implementation of 'n' reference periods would be possible in future.

7. The in-year data system requires adequate trialling and evaluation prior to full implementation, where that 'system' encompasses the technology platform, guidance to providers, quality rules, credibility reports and other features. The programme should aim to trial in-year student data collection for the 2027-28 year, for at least some providers, in order to test the system components. The OfS will work with Jisc to define the scope and nature of trial activities. While the technology platform is not fundamentally changing, ways of working and processes will need to evolve to enable the annual student collection cycle to happen multiple times a year. The OfS expects that Jisc will document a comprehensive testing plan, with detailed requirements for this to be agreed during the design phase, and that both the plan and the results it produces in due course are communicated effectively to relevant stakeholders.
8. The OfS expects Jisc to adopt an agile, responsive approach to testing at formative and final stages of development, to ensure timeliness in the learning and contributions of the sector's data professionals. This will require a high degree of transparency and open dialogue with data practitioners throughout the programme, including when features or specifications remain subject to change, to ensure good awareness of the culture change in-year data collection promotes. To this end, sector engagement should be proactive and offer compelling articulations and worked examples able to convey benefits to stakeholders at all levels, to help secure buy-in to the importance of the programme. Achieving this will require that meaningful measurement metrics or success criteria are defined (where possible and appropriate to do so) in respect of each of the benefits set out at Annex A and any others identified through continued collaboration between Jisc, the OfS and other statutory customers.
9. The OfS expects the programme to be delivered to the timeline set out in its view of the critical path shared with Jisc. It is expected this will be kept under collaborative review and changes agreed at a minimum of six-monthly intervals, in line with the decision points highlighted and using the programme change control and governance as appropriate. The OfS considers it critical that each milestone is delivered to timings agreed with Jisc and to the scope and quality agreed by us and the programme board during the design phase(s).

## **Expectations of delivery approach**

10. The OfS expects Jisc to base the programme on the principle that development is a collaborative, phased approach that incorporates close and tailored engagement with the OfS and other statutory customers, the sector's data professionals and senior leaders, and software suppliers. Programme deliverables should be defined with reference to feedback, testing and reflection throughout, with learning from each phase being used to shape and refine the next.
11. The OfS expects Jisc to commit resources appropriate to the scope and nature of this programme, including in terms of the numbers of roles contributing to programme delivery and the expertise of individuals occupying those roles. It is expected that some roles will need to be assigned full-time to programme delivery, while others may draw on contributions from subject matter experts across Jisc.
12. It is expected that the OfS (and other statutory customers) will have appropriate visibility of, and opportunity to comment on or contribute to, materials including: the programme's business case and mandate; budget and financial reporting; risk registers and decision logs; technology and product development roadmaps. In the event that Jisc considers it inappropriate for such materials to be shared with wider sponsoring or programme board membership, as the

designated data body in England it is expected to share such information openly with the OfS upon receipt of a reasoned request.

## **Expectations of delivery requirements**

13. Through effective programme governance and oversight, Jisc will ensure:

- Robust governance arrangements, with defined roles and responsibilities across delivery partners are in place and reviewed throughout.
- Programme funders and stakeholders have access to key materials in a timely manner.
- Risks are monitored, assessed, and escalated appropriately, with mitigation strategies in place.
- Programme cost estimates, and the funding arrangements for its delivery, are established at the outset of delivery.
- Proportionate assurance and governance structures are in place.
- Adoption and tracking of the PwC recommendations, as directed by the OfS or the programme board if appropriate.
- Feedback loops, lessons learned activities, and mechanisms for continuous improvement are incorporated into the programme, and opportunities to improve user experience and data quality through technology advancement during the programme are actively pursued.
- Benefits of the programme are identified, measured and quantified where possible and meaningful to do so. The OfS will work collaboratively with Jisc and other statutory customers to define these.

14. Jisc will ensure the system design and implementation delivers:

- A system that supports cumulative data returns, retaining a full data model across reference periods. Schema stability is essential.
- Implementation that supports two reference periods, with expectation of an expansion to three, and design enabling expansion to more.
- Updates to the HESA Data Platform and rule base that are delivered in line with academic cycles and with notice periods that have regard to the time providers and software suppliers may need to plan and prepare.
- A specification that states the data fields the OfS, UKRI and DfE require, our expectations for the quality of the data, and the form and manner in which the DDB requires the data to be compiled and provided.
- Appropriate automation, and user interface(s) that support providers to achieve the required data quality standards and to experience minimal burden when interacting with the systems, its component tools and approaches.

15. To ensure data quality is maintained, Jisc will:

- Work with us and other statutory customers to produce a specification detailing required data fields, expected quality standards, and submission formats.
- Ensure quality thresholds are proportionate and support provider autonomy. The system will include categorised rules and issue management features.
- Monitor provider readiness, with targeted support for those at risk of non-compliance. Escalation protocols will be defined.
- Make recommendations on changes to data fields and quality, for referral to the OfS for decision-making, with appropriate consultation (including with DfE and UKRI).

16. To ensure burden management and minimise pressure on the sector, Jisc will:

- Have due regard for the burden and costs proposed deliverables may incur for providers at all stages, including decision-making and change processes. To the extent possible, it will support providers to understand any additional resources they may require to operate changed processes in their own context.
- Support and monitor the parallel identification of opportunities to reduce provider burden as a key interdependency. This will include removal of redundant data items, alignment with other data collectors, and reduced burden of quality rules.
- Be mindful of appropriate timescales for changes, both for consultation and software supplier developments. Where possible, two years of notification should be provided for any major schema changes.

17. Jisc will ensure provider support and engagement is:

- Clear, timely and tailored to support provider readiness and compliance.
- In line with a shared communications plan, to include regular updates on progress, system functionality, and data model changes.
- Delivered via formal and informal consultation mechanisms to gather sector feedback and inform development.
- Accountable for the regulatory interface between the OfS and providers, ensuring consultation processes are accounted for within programme planning.

## **Annexes**

This document has the following annexes:

- Annex A: OfS's view of benefits of the in-year data programme

## Annex A: OfS’s view of benefits of the in-year data programme

The benefits the in-year data programme should aim to realise will be aligned with the strategic aim we have set out above. The benefits we anticipate the programme realising are:

<b>In-year data should facilitate:</b>	<b>Which should enable or support:</b>
<p>More timely information for policy and strategic decision making, including for providers' governance, planning and marketing purposes</p>	<ul style="list-style-type: none"> <li>- Continual improvement in quality of provision, widening participation and reducing inequality as a result of the OfS’s and providers' improved capacity for and capability to identify areas for enhancement or intervention, and to act at a time that better protects the interests of current as well as future students.</li> <li>- More efficient use of providers' funds and resources, with internal funding and planning decisions informed by more intelligent analysis and based on the latest figures.</li> <li>- More timely and efficient use of OfS resources for understanding of emerging sector trends, risks and issues, used to inform and action policy development and interventions to protect the interests of current as well as future students.</li> </ul>
<p>More timely insights on emerging sector data, risks and issues, including for benchmarking against peers and competitive advantage</p>	<ul style="list-style-type: none"> <li>- Continual improvement in quality of provision, widening participation and reducing inequality as a result of the OfS’s and providers' improved capacity for and capability to identify areas for enhancement or intervention, and to act at a time that better protects the interests of current as well as future students.</li> <li>- More efficient use of providers' funds and resources, with internal funding and planning decisions informed by more intelligent analysis and based on the latest figures.</li> <li>- More timely and efficient use of OfS resources for understanding of emerging sector trends, risks and issues, used to inform and action policy development and interventions to protect the interests of current as well as future students.</li> </ul>
<p>General monitoring of recruitment, access and retention</p>	<ul style="list-style-type: none"> <li>- Continual improvement in quality of provision, widening participation and reducing inequality as a result of the OfS’s and providers' improved capacity for and capability to identify areas for enhancement or intervention, and to act at a time that better protects the interests of current as well as future students.</li> </ul>
<p>More timely student outcome measures to inform regulatory assessments, including in B3 and TEF</p>	<ul style="list-style-type: none"> <li>- Continual improvement in quality of provision, widening participation and reducing inequality as a result of the OfS’s and providers' improved capacity for and capability to identify areas for enhancement or intervention, and to act at a time that better protects the interests of current as well as future students.</li> </ul>
<p>Better informed financial health monitoring of providers</p>	<ul style="list-style-type: none"> <li>- More timely and efficient use of OfS resources for understanding of emerging trends in the financial health of the sector, and risks and issues for individual providers, used to inform and action interventions to protect the interests of current students.</li> </ul>

In-year data should facilitate:	Which should enable or support:
Better informed distribution and protection of public funding for higher education	<ul style="list-style-type: none"> <li>- Better informed funding decisions, including spending reviews, that protect student and taxpayer interests, as a result of more timely and up to date modelling of funding allocations and implications.</li> <li>- Confidence in the effective and appropriate use of public funding invested in higher education.</li> </ul>
NSS target lists and process simplification	<ul style="list-style-type: none"> <li>- Minimisation of regulatory process burden: providers and the OfS need to commit fewer resources to checking and adjusting of target lists, and the operation of the survey.</li> </ul>
Potential for student survey coverage expansions, including to PGT students	<ul style="list-style-type: none"> <li>- Minimisation of regulatory process burden: providers and the OfS need to commit fewer resources to navigating a reduced set of logistical challenges when implementing any changes to survey coverage.</li> <li>- Creation of additional regulatory and provider intelligence, and additional student information, through the availability of survey response data for expanded cohorts, e.g. for use in future TEF assessments.</li> </ul>
Understanding the impacts of exceptional events (e.g. pandemic, industrial action)	<ul style="list-style-type: none"> <li>- Reduction in burdensome ad hoc data requests to providers (in particular, requests that do not support UK-wide comparison).</li> <li>- More timely and impactful analysis by academic researchers and other third parties, to better inform public narratives in the public interest.</li> <li>- Regulatory, policy and funding decisions informed by more timely data deliver greater impact in the student, public or provider interest, through better informed narratives, policy design or interventions.</li> </ul>
Understanding the impacts of change in fees and fee status	<ul style="list-style-type: none"> <li>- Regulatory, policy and funding decisions informed by more timely data deliver greater impact in the student, public or provider interest, through better informed narratives, policy design or interventions.</li> </ul>
Quicker understanding of the delivery and impacts of government policy initiatives (e.g. LLE)	<ul style="list-style-type: none"> <li>- Regulatory, policy and funding decisions informed by more timely data deliver greater impact in the student, public or provider interest, through better informed narratives, policy design or interventions.</li> <li>- Policy initiatives more responsive to emerging features or risks as these become evident through reporting and analyses of more timely data.</li> </ul>
Improved workload distribution for provider data teams by smoothing the work	<ul style="list-style-type: none"> <li>- Minimisation of regulatory process burden: providers empowered to plan resource commitments for compliance with student data collection requirements.</li> <li>- Improved data maturity and data quality enables providers to access, utilise and act upon strategic and operational insights, from its own data as well as centralised data sources.</li> </ul>

<b>In-year data should facilitate:</b>	<b>Which should enable or support:</b>
Improved data capabilities and increased use of automation, raising data maturity, improving data quality and reducing burden	<ul style="list-style-type: none"> <li>- Providers able to access, utilise and act upon strategic and operational insights, from their own data as well as centralised data sources.</li> <li>- Continual improvement in quality of provision, widening participation and reducing inequality as a result of providers' improved capacity for and capability to identify areas for enhancement or intervention, and to act to protect the interests of current as well as future students.</li> <li>- More efficient use of providers' funds and resources, with internal funding and planning decisions informed by more intelligent analysis and based on the latest figures.</li> </ul>
More timely data informing student-facing resources, such as Discover Uni, league tables, etc.	<ul style="list-style-type: none"> <li>- Students making informed choices about what, where and how they will study in higher education.</li> </ul>
More up to date data in Heidi+ and tailored datasets	<ul style="list-style-type: none"> <li>- Providers able to access, utilise and act upon strategic and operational insights, from their own data as well as centralised data sources.</li> <li>- Continual improvement in quality of provision, widening participation and reducing inequality as a result of providers' improved capacity for and capability to identify areas for enhancement or intervention, and to act to protect the interests of current as well as future students.</li> <li>- More efficient use of providers' funds and resources, with internal funding and planning decisions informed by more intelligent analysis and based on the latest figures.</li> <li>- Third parties able to access more timely data insights via tailored datasets reduces their data requests to providers (in particular, requests under the Freedom of Information Act).</li> </ul>
More timely data availability to statutory customers, PSRBs and other bodies with appropriate consistency of specification to support a 'collect once, use many' approach	<ul style="list-style-type: none"> <li>- Minimisation of regulatory process burden: reduction in number or complexity of regulatory data collections where relevant intelligence can be derived from in-year data, e.g. removal or simplification of the Higher Education Students Early Statistics (HESES) survey.</li> <li>- Reduction in number or complexity of other statutory and non-statutory data returns where relevant intelligence can be derived from in-year data, e.g. removal or simplification of data returns to government departments, PSRBs, etc.</li> </ul>

The benefits listed here are to be further expanded, through continued collaboration by Jisc, the OfS and other statutory customers.