

HESES25 multiplication factors representations process guidance

**Submitting representations for
consideration**

Reference OfS 2025.68

Enquiries to heses@officeforstudents.org.uk

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Contents

Summary	2
Background	3
Multiplication factors applied to 2025-26 student provision.	3
Overview of representations process	6
Principles on which representations will be considered	6
Submission of representations	7
Reviewing representations	8
Further information	9
Annex A: Further guidance on representations	10
Change in provision at a provider	10
Changes to provision affecting FTEs	11
Available historical data can be used instead of sector averages	12

Summary

1. All higher education providers registered with the Office for Students (OfS) in the Approved (fee cap) category must annually return data on the number of registered students they have. For the 2025-26 academic year, this is the **2025 Higher Education Students Early Statistics (HESES25)** survey.¹
2. As described in our 'Changes to 2025 student data surveys to inform funding' publication,² Student data for 2025-26 returned in HESES25 will be used to inform OfS funding allocations for 2026-27.
3. The funding process takes the headcount of student years returned in HESES and applies multiplication factors to determine the funding data for each provider.
4. This document provides information on the process by which providers can submit representations for consideration where they believe that the multiplication factors used by the OfS may not be appropriate due to significant changes in their provision compared to 2024-25.
5. Providers must submit representations to the OfS via the provider portal by **noon** on **Friday 13 February 2026** at the latest for inclusion in the initial grant announcement for the 2025-26 academic year.
6. Representations must be submitted using the multiplication factors sections of Tables 3 and 4 in the HESES25 workbook, accessible on the provider portal, and meet the criteria in this document.

Please email any questions to heses@officeforstudents.org.uk.

¹ See [Higher Education Students Early Statistics survey 2025-26](#) on the OfS website.

² See ['Changes to 2025 student data surveys to inform funding'](#) on the OfS website.

Background

7. The calculation of OfS funding allocations is primarily informed by student data that providers return in the Higher Education Students Early Statistics (HESES) data survey. Up to and including the 2022-23 academic year, completion of the HESES survey required providers to include forecasts of:

- a. 'Non-completion' – essentially an estimate of the proportion of students in the return who would not achieve their study intentions by the end of the year.
- b. The full-time equivalence (FTE) of part-time students – an estimate of the study intensity for these students.

These elements were incorporated into the funding FTE figures derived from HESES, used to determine funding for the following academic year.

8. In 2022-23, the designated data body (Jisc) changed the specification for the Student record. As a result of these changes, the OfS made corresponding changes to the HESES return for 2023-24, removing the requirement for completion and FTE data to be returned.³
9. To compensate for the removal of this data, we introduced multiplication factors as a way to derive fundable FTE numbers from the HESES data in a way consistent with previous years.⁴
10. Multiplication factors apply a fraction to the headcount recorded in HESES to reflect expected non-completion rates and (for part-time students) intensity of study. A provider will have different multiplication factors reflecting combinations of mode of study, price group and level of study. Multiplication factors are only applied to home-fee, OfS-fundable student numbers.
11. The multiplication factor process has been used for the HESES data submitted in 2023-24 and 2024-25. In each year, providers have been given the opportunity to submit representations on any multiplication factors which they think do not appropriately describe their provision.

Multiplication factors applied to 2025-26 student provision

12. We will continue to use the multiplication factor process for 2025-26 HESES data to derive funding FTEs that will inform the calculation of OfS funding for the 2026-27 academic year. For the majority of providers, we will use the multiplication factors agreed in April 2025, following the conclusion of the representations process for 2024-25 data. These have been adjusted to align with the new format of the HESES25 return. For example, we no longer require HESES data to differentiate between undergraduate courses at Levels 4 and 5 versus Level 6, so only unified 'undergraduate' multiplication factors are required.
13. Where a provider is new to the sector, we will use multiplication factors that reflect sector-level data.

³ See '[Changes to 2023 student data surveys to inform funding](#)' on the OfS website.

⁴ The HESES data is supplemented by adjustments to student FTEs that we make for funding purposes, such as to recognise certain expected changes in the year for which funding is provided in medicine and dentistry or arising from transfers of provision between providers.

14. The multiplication factors that we intend to use are set out in Section C of Tables 3 and 4 in your provider's HESES25 workbook. We have used individual multiplication factors for each category of OfS-fundable students, reflecting all combinations of:

- Mode of study – these are full-time, sandwich year out or part-time
- Price group (Table 3 only) – these are A, B, C1.1, C1.2, C1.3 (based on the 2024-25 factor for C1.2), C2 or D
- Profession of students on pre-registration health courses (Table 4 only)
- Level of study – these are undergraduate (UG) and postgraduate (PGT).

These multiplication factors reflect the non-completion rates for each mode, and the intensity of study for sandwich year out and part-time students.

15. You should review the multiplication factors in Section C of these tables and determine if they are representative of your provision for the 2025-26 academic year.

- a. If you consider the proposed multiplication factors to be appropriate, then no further action is required.
- b. If you believe that one or more of the multiplication factors is no longer appropriate, then you can submit alternate figures for our consideration. Representations are made by completing Section D of Tables 3 and 4 in HESES25 and uploading the workbook to the OfS portal.

16. Although the multiplication factor representations sections are contained within Tables 3 and 4 of the HESES25 workbook, please be aware that submitting representations is not required.

Multiplication factors for new provision

17. If you have recorded new provision in HESES25, we will apply a multiplication factor based on historical data. This multiplication factor is based on aggregated data at one of four levels, taken from either your provider or from the sector as a whole.

18. If we have insufficient data to calculate a robust multiplication factor, we then move up a level until sufficient data is available.

19. For Table 3 in the HESES workbook, levels 1 to 4 represent the following variables:

- Level 1 – Provider, mode, price group, level of study and fundability status
- Level 2 – Provider, mode and level of study
- Level 3 – Sector, mode, price group, level of study and fundability status
- Level 4 – Sector, mode and level of study.

20. For Table 4, the levels of aggregation are:

- Level 1 – Provider, mode, profession and level

- Level 2 – Provider, mode and level
- Level 3 – Sector, mode, profession and level
- Level 4 – Sector, mode and level.

21. Where we are unable to determine a relevant provider average figure for a particular student category using the provider's own historical data, we will use relevant sector average data for each category to inform the multiplication factor.
22. We reserve the right to use our own estimates of the data if we consider the data returned by a provider to be inaccurate. Where multiplication factors are based on sector averages, rather than a provider's own data, we will not make adverse changes to funding allocations for the provider if those sector averages change.

Overview of representations process

23. Providers can make representations to the OfS if they believe the multiplication factors are no longer appropriate. Representations will only be considered where the changes may have a significant impact on the indicative funding visible in your workbook.
24. You can submit representations to the OfS via the provider portal from the HESES25 census date until **noon on 13 February 2026**.
25. Representations are made using the HESES25 workbook. We will take the latest version of the workbook that has been submitted by this deadline as the final representations for your provider.
26. Following the deadline, the representations will be checked. Valid submissions will be considered by a panel which will recommend a final decision to the appropriate decision maker. Final multiplication factors will then be confirmed for all providers that have submitted representations.

Principles on which representations will be considered

27. We are aware that provision at higher education providers does not always remain static year-to-year. Significant changes to provision in 2025-26 may mean the multiplication factors agreed for 2024-25 may no longer be appropriate for determining the total FTE at your provider. To account for year-to-year changes, you can submit representations on the multiplication factors being applied to 2025-26 data.
28. For representations to be considered they must meet the criteria outlined in paragraphs 31-36. We would expect there to be small differences between years; this process will focus on only significant changes to provision which would not otherwise be captured by the multiplication factors used. The thresholds are not open to appeal.
29. It is acceptable to suggest an updated multiplication factor that represents the cumulative effect of changes to provision over several years. (For example, from courses being taught out over a number of years.) However, any such cumulative changes must still meet the thresholds set out below.
30. To be considered, proposed alterations to the multiplication factors must have a significant and material impact on the indicative funding shown in the HESES25 workbook. Providers should use these pages to see how changes to multiplication factors might impact funding.

Please note that the indicative funding figures shown in the HESES25 workbook are for information only and should not be taken as representative of the funding that the OfS will allocate for 2026-27.

31. We will consider data and financial thresholds as part of the representations process. Representations must result in one of the following changes, whichever is smaller:
- a. A predicted change to funding based on the indicative funding tables contained within the representations workbook of at least £100,000; or
 - b. A predicted change to funding based on the indicative funding tables contained within the representations workbook of at least 10 per cent of a provider's total funding allocation in 2025-26.
32. For representations on multiplication factors being applied to price group A, changes to multiplication factors must be at least 0.02 or larger to be considered for the representations process. If representations are made on a change to a factor smaller than 0.02 then they will not be considered.
33. For representations on multiplication factors being applied to price groups B, C1.1, C1.2, C2 and D, changes to multiplication factors must be at least 0.05 or larger to be considered for the representations process. If representations are made on a change to a multiplication factor smaller than 0.05 then they will not be considered.
34. The lower threshold for price group A accounts for the fact that smaller changes in this price group can result in material changes to funding equal to or greater than larger changes in other price groups.
35. Where representations are made to change a multiplication factor, there should be a clear rationale for the change. Further guidance on submitting representations can be found in Annex A.
36. We will not consider representations made on the following principles:
- a. where representations will result in a change in indicative funding which does not meet the thresholds above.
 - b. where a provider disagrees with the OfS using sector averages (levels 3 and 4).
 - c. where aspirations or targets are provided as the rationale for a change in the proposed multiplication factor.

Submission of representations

37. Your provider will need to delegate the ability to submit the HESES return to one or more members of staff after HESES is launched on the new OfS portal. Staff who are given access to the HESES25 area of the portal will be able to:
- upload completed HESES workbooks and download copies of submitted data
 - sign off the HESES data on behalf of your provider
 - submit representations on the multiplication factors shown in the HESES25 workbook.

It is up to providers to decide which members of staff should have this access.

38. To submit representations, you should complete the relevant sections of Tables 3 and 4 of the HESES25 workbook. This workbook should then be uploaded to the OfS portal. When you are satisfied it is correct, you should sign off this workbook in the portal. By signing off such representations, you are confirming that you have been issued with delegated authority within your provider to do this. We will also ask you to confirm that the representations submitted have been reviewed with senior management and that the accountable office for your provider has agreed to the representations being submitted.
39. If you upload representations, please email us at HESES@officeforstudents.org.uk, so that this can be tracked. This is also the case if you amend any representations previously made.

Deadlines

40. The deadline for HESES25 data (that is the student headcount recorded on Tables 1 and 2 of the HESES workbook) is **30 January 2026**. After this point you will still be able to make further uploads of the HESES25 workbook to submit representations on multiplication factors. This allows providers additional time to reflect on how accurate the multiplication factors are in light of the final HESES student data position. The deadline for submitting representations is **13 February 2026**.
41. The HESES data verification period, up to 30 January 2026, is only concerned with reviewing and gaining assurance on HESES25 student data. We will not routinely be checking that previously submitted representations have been included in amended data. Submitting representations is not compulsory and it is the responsibility of the provider to ensure that any representations are submitted by noon on 13 February 2026.
42. You can submit representations as many times as is required, but only the latest version of the representations received by 13 February will be used. If you submit representations in an earlier upload of the HESES25 workbook, these representations need to continue to be included in any subsequent uploads.
43. Please note that once the HESES25 data deadline (30 January) has passed, if you upload the HESES workbook to submit multiplication factor representations, you should ensure that there are no changes to the data on Tables 1 and 2. We will not process workbooks that contain changes to the final signed off HESES25 data.
44. In order to guarantee inclusion in the initial grant announcement for 2026-27, you must meet the deadline for submitting representations on 13 February 2026. We may choose to review any representations received after this date, but we cannot guarantee that the outcomes of successful representations will be included in the initial 2026-27 allocation.

Reviewing representations

45. Representations meeting the criteria outlined in this guidance will be reviewed by a panel.
46. Although multiple representations are submitted in a single workbook, they will be considered on an individual basis. This may mean that a provider has some multiplication factors changed as a result of the representations process where others remain the same.

47. The panel will make final recommendations on whether to accept representations to the relevant decision maker. We will then inform providers of the outcomes of the representations.

Further information

48. If you have any questions about the process for submitting representations on multiplication factors, please contact the funding team at heses@officeforstudents.org.uk.

Annex A: Further guidance on representations

1. You can submit representations on each proposed multiplication factor by suggesting a new multiplication factor that should be used instead. Clear reasoning and evidence will need to be provided as to why the new factor is more appropriate to use. An explanation as to how the new multiplication factor has been calculated will need to be given in order for the representation to be considered.
2. There is a range of different reasons why providers may choose to submit representations. To help you decide what may be appropriate, we have provided a number of example scenarios. This is not an exhaustive list but gives context to what is expected as part of the representation process.
3. With any representation that is submitted, we would expect the following information to be given:
 - a. A narrative explanation detailing how provision has changed at the provider.
 - b. Why this change has had an impact on the calculated multiplication factor.
 - c. Why the alternative multiplication factor is more appropriate, including some information on how the proposed multiplication factor has been derived.

Change in provision at a provider

4. In some cases, changes to a provider's provision can reasonably be assumed to have had a material difference on the non-completion rates. We would expect the majority of representations on this topic to fall into one of two scenarios:
 - a. A provider has closed a course which historically had a non-completion rate that differed significantly from other provision in the same category.
 - b. A provider has started to run a course similar to other provision it has historically run and can make a reasonable argument as to why the historical data for other provision may be more suitable to use for the multiplication factor.
5. It is important to note that the OfS does not require providers to maintain records of non-completion data for OfS funding purposes. The last year for which providers were required to submit non-completion records was the 2021-22 academic year. This data will have been used in HESES22 and we are aware that providers will not hold more recent data on non-completions.

Example 1

A multiplication factor for full-time, price group C2, UG is proposed by the OfS at level 2.

The provider previously ran a full-time Higher National Diploma in price group C2 which had a non-completion rate of 35 per cent, based on data from the 2021-22 academic year. The non-completion rate for this course was significantly higher than the other courses within the category. The course has closed for the 2025-26 academic year, meaning it is no longer appropriate to consider the 35 per cent non-completion rate in the calculations for the multiplication factor, which was agreed in 2024-25.

The provider suggests a lower alternative multiplication factor for consideration.

Changes to provision affecting FTEs

6. In some cases, changes to a provider's provision may reasonably be assumed to have had a material difference on the FTE rates. We would expect the majority of representations on this topic to fall into one of three categories:
 - a. A provider has closed a part-time course for which removal would have a material difference on the rate of FTE calculated.
 - b. A provider has started to run a part-time course for which data would have a material difference on the rate of FTE calculated.
 - c. A provider has altered a part-time course, and the basis on which it is taught, resulting in a significant change to the rate of FTE (for example, delivering a two-year part-time course over four years).

Example 2

A multiplication factor for part-time, price group B, UG students is proposed by the OfS at level 1.

The provider has introduced a part-time course with 200 years of engagement in this category with an FTE of 0.75. The only course previously recorded in this category had 30 years of engagement with an FTE of 0.05. With the addition of the new course, the previously agreed 0.05 FTE will not be a reasonable figure to use in the multiplication factor calculations.

The provider suggests an alternative multiplication factor for consideration of 0.7, which more accurately reflects the provision with the introduction of the course.

Available historical data can be used instead of sector averages

7. In some cases, a provider may have been assigned a multiplication factor based on sector averages, but the provider holds clear historical data not considered in the HESES data which can be used to calculate a more accurate multiplication factor.
8. We are only anticipating representations like this where a provider has previously delivered a course under a subcontractual arrangement for another provider but has now begun running the course in its own right, with the students now contractually registered with the provider making the representations. This would mean that 2025-26 was the first academic year for which the delivering provider returned the students, but these students would have previously generated countable HESES years on the return of the provider subcontracting out the teaching.
9. For representations such as this, we are asking providers to include the following information:
 - The name of the course or courses which were previously delivered under subcontractual arrangements
 - A clear narrative explaining the change and evidence that the provider holds appropriate data on the non-completion rates and FTEs for the course or courses.



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