

Response ID ANON-H6AS-2H65-Q

Submitted to HESA Consultation
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1. INTRODUCTION

1 About your organisation

What organisation are you responding on behalf of?:
Universities and Colleges Employers Association (UCEA)

2 What email address do you want your completed survey to be sent to?

Email:
l.hopkins@ucea.ac.uk

3. WHAT WE COLLECT, ASSURE AND DISSEMINATE

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

3 Estates Management record

Yes

4 If so, for what purposes?

Text box: please enter your what you use Estates Management record data for:
UCEA uses aggregate analyses of the estates management record to inform its assessment of the financial context facing HE employers.

5 Does the access to the UK-wide picture determine much of the value of this collection?

Yes

6 With what frequency would the data need to be collected to meet your needs?

Text box: please enter frequency required to use Estates Management record data:
Yes – UCEA is interested in a sector level picture so a partial record would reduce the value of the data.

7 Are there any areas of the collection that you feel are not necessary?

Text box: please enter any areas not necessary in Estates Management record:

8 Are there any areas that are not currently collected, but which you would like to be collected?

No

9 If so, what and to what purposes would you put it?

Text box: please enter additional areas you would like to see collected in Estates Management record:

10 Are you likely to continue to subscribe to this record when the cost is part of a voluntary subscription?

No

11 Staff record

Yes

12 If so, for what purposes?

Text box: please state what you use staff record for:
UCEA uses the staff record extensively. We annually order bespoke staff data covering recruitment and retention, staff salaries and the workforce profile. These data are used, inter alia, to:

- Inform responses to Government consultations on employment and related legislation and policy. This includes submissions to the Migration Advisory Committee and analyses prepared for other sector agencies (e.g. UUK).
- Cost pay awards for the HE sector (annually).
- Monitor trends and changes in the HE workforce. We publish a full Workforce Survey biennially, with an annual update, which draws extensively on the HESA staff record.

- Inform joint working with trade unions on matters pivotal to maintaining healthy sector-level dialogue; recent and current focus has been particularly on the gender and ethnicity pay gaps and the employment of fixed-term and casual staff.
- Monitor pay trends as a continuation of a sector-level commitment first made in the Review of Finance and Pay Data in 2008.
- Inform important policy research to address HE provider policies and positions, including recent work on ethnicity pay gaps, international staff flows and studies on immigration costs.
- Assist UCEA members in benchmarking areas and functions, particularly in professional services such as marketing and HR, against the wider sector.

According to feedback from our members, these data are used by individual HEIs for:

- internal and external benchmarking exercises including benchmarking for Research Ethics Committee applications.
- enabling efficient and timely responses to workforce-related Freedom of Information requests.
- providing sector-level or benchmark HE provider data for internal reports, e.g. to Councils and Boards, and for participation in important benchmarking surveys, e.g. UCEA's sickness absence survey and salary surveys.
- Athena SWAN applications, equality strategy development, equal pay reviews and other related equality and diversity analysis and monitoring.
- inform strategy around both internal and external staff data provision, and to record progress against institutions' strategies.

The requirement to submit accurate detailed data to HESA is also a mechanism to meet internal accuracy requirements under GDPR.

Members have also noted that the binary divide between academic/non-academic staff fails to acknowledge the vital contributions of technicians and other professional services staff to teaching, learning, research and student support at universities. Retaining a record on only one half of the workforce is therefore misaligned to the way in which HEIs deliver value to students and the wider economy. Some of our members have also noted that there is limited upside in not making submission as most of the complexity and time burden is related to the academic record.

Our members also stress that they value the uses of these data for policy and research purposes at sector level. The loss of these data or a reduction in quality will have adverse effects on evidence-based policy making in important areas such as equality and diversity, attainment and value for money. As the UK looks ahead to a post-Brexit landscape and new immigration arrangements it is vital that the sector can understand its workforce and skills needs and can continue to provide detailed and robust evidence to the Migration Advisory Committee and policy makers.

If such data were not available to HEIs the potential adverse effects are significant. These include:

- Negative impact of the possibility of undertaking valuable and effective internal and benchmarking exercises to realise efficiency gains.
- Additional workload and changes to IT systems and processes if data should be collected internally, which could in turn prevent like-for-like comparisons as each HEI might adopt different methods.
- Negative impact on UCEA and other sector bodies' ability to provide sector-wide analysis based on HESA data to influence and guide important employment policy decisions.
- An anticipated increase in FOI requests regarding workforce data, with consequent cost and burden, received by each HEI if information that includes professional services staff cannot be obtained from HESA.
- Challenges in collecting personal information from academic staff that is not required for others.
- Additional costs associated with accessing substitute sources of benchmarking data.
- HE providers' employment policies and practices are relevant to their entire workforce, not just their academic staff, and it is right that there is an ability to use data to examine how they employ their Professional Services staff as well as their academic staff.

Relating to Q13

It is imperative that the record maintains its UK-wide coverage as its value would be much diminished in a partial capacity. There are considerable concerns among both our members and the HE trade unions in the 'non-academic' record moving to a voluntary basis. As noted by one UCEA member:

"It is important to know that when examining the return data that it covers the UK wide picture and the statutory element is valued as a prompt to ensure accuracy and data quality across the sector."

Such an approach will inevitably result in the application of cost-saving measures. This impact might be reduced if the mandatory subscription is reduced to reflect the reduced level of data submission and the overall subscription (mandatory plus voluntary) can remain the same. The likelihood is however that the number of HE providers submitting data voluntarily will decrease over time even with the known benefits to accessing the data – and as numbers reduce the meaningfulness of the data will reduce until the record is no longer viable. Small institutions are likely to be the first to fall out due to lack of resources and 'free riding' (using the data but not submitting) may take place by some HEIs. This will likely result in skewing of any data that is collected voluntarily towards larger HEIs. This collective action problem can really only be solved by mandatory collection, which we understand will continue in Northern Ireland, Scotland and Wales. However, in light of the OfS decision as it currently stands, we would urge that HESA adopts an approach that maximises the likelihood of HE providers continuing to provide a comprehensive staff data return, i.e. including 'non-academic' staff.

We are also concerned that a voluntary subscription model might mean that these data are made available only to those HE providers paying additional fees to HESA, as to do otherwise could inadvertently encourage 'free riding' with its consequent erosion of data validity. We urge therefore that there is consideration of this issue and also as to how sector bodies and other stakeholders, including students and trade unions, would be able to have access to these important data.

13 Does the access to the UK-wide picture determine much of the value of this collection?

Yes

14 With what frequency would the data need to be collected to meet your needs?

Text box: what frequency would staff data be required to suit your needs?:

Annually.

15 Are there any areas of the collection that you feel are not necessary?

Please explain your answer:

While nearly all of the fields in the record are used for different aspects of our work, we would understand and support HESA undertaking a review of all fields in the record that might assess both their current usefulness and the ability of HESA to collect this information accurately. We suggest this could be a potential alternative way to address the OfS desire to reduce regulatory burden while retaining the important information that could be gathered from a comprehensive mandatory collection.

16 Are there any areas that are not currently collected, but which you would like to be collected?

Yes

17 If so, what, and to what purposes would you put it?

If so, what, and to what purposes would you put it?:

It is important that the staff record continues to be regularly reviewed and we would support further engagement with HEIs to identify any areas that could be removed and any areas which may benefit from additional collection.

The use of subsidiary companies has long been present in the HE sector, but this has generally been to enable HEIs to run businesses that are not fully aligned with the purpose of the university itself and that may have a greater commercial focus. However, for some HE providers the number of staff employed by their subsidiaries has increased significantly as these companies are now used to provide a greater number of services on behalf of the university. UCEA believes this trend will continue with new providers and as existing providers seek to provide the best service they can for students in the most cost-effective manner. An unforeseen consequence of this is that the number of staff being included in the HESA return may be under-reported as currently only those employed directly by the university must be included. We believe that by widening the categories of staff to include those that are employed via a wholly owned subsidiary (while keeping all other criteria the same) a more complete picture of staffing in HE would be obtained.

The purpose of including staff from subsidiaries would be to ensure that the record captures staff employed by and through HE providers in a diversity of organisational forms. This would ensure information is being gathered on staff delivering professional service and academic-related functions irrespective of the vehicle through which they are employed.

Please note Q18 that we are not a provider so we are answering this as 'Yes' as we would continue to purchase data.

18 Are you likely to continue to subscribe to this record when the cost is part of a voluntary subscription?

Yes

19 General question: Is there anything else that we should collect?

No

20 If so, what and to what purposes would you put it?

If so, what and to what purposes would you put it?:

3.3 MINIMISING THE BURDEN OF DATA COLLECTION

21 Statutory Burden Minimisation activities

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

22 The Data Landscape Steering Group (DLSG)

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

5.2 UK PERFORMANCE INDICATORS – A FUNDAMENTAL REVIEW

28 What uses are currently made of the UK Performance Indicators by your organisation?

What uses are currently made of the UK Performance Indicators by your organisation?:

29 Do you support continued production and publication of the UK Performance Indicators by HESA?

Yes

30 Please explain your answer

Please explain your answer:

31 If you answered Yes, what do you believe the main role and purpose of the indicators should be, and how should they inter-relate to other relevant metrics published by UK governments, regulatory and funding bodies?

If you answered Yes to question 29, what do you believe the main role and purpose of the indicators should be, and how should they inter-relate to other relevant metrics published by UK governments, regulatory and funding bodies? :

32 If you answered Yes, what do you think needs to change in the content, production processes or governance structures to ensure that the UK performance indicators can support the role and purpose you explained in the previous question?

If you answered Yes to question 29, what do you think needs to change in the content, production processes or governance structures to ensure that the UK performance indicators can support the role and purpose you explained in question 30?:

5.3 ONWARD USES OF DATA NOT CONSIDERED AS STATUTORY

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

No

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

No

5.3 (continued) CATEGORIES OF NON-STATUTORY ONWARD USES OF DATA

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

Unsure

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

We are not a provider.

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

Unsure

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

We are not a provider.

However, UCEA is a third party purchaser of HESA data and uses the data purchased extensively on behalf of its 172 member organisations. Feedback from our members has stressed the value that they place on the analysis of HESA data that we do on their behalf and that this should continue for all aspects of the staff record.

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

Unsure

If No or Unsure, please can you explain :

We are not a provider.

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

Unsure

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

We are not a provider.

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

Unsure

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

We are not a provider.

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

Unsure

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

We are not a provider.

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

Please explain your answer:

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

text box:

6. ADDITIONAL QUESTIONS

43 Data Futures: open commentary

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

44 Graduate Outcomes: open commentary

The Graduate Outcomes Survey is in its inaugural year and we are working closely with the Graduate Outcomes Steering Committee to improve and develop the service to meet the needs of the sector. We would welcome any feedback that you would like to give regarding our Graduate Outcomes Programme. :

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

Yes

If you answered yes, please provide contact details below:

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