

10 April 2025

To: Heads of higher education providers in Wales that subscribe to HESA and return the Aggregate Offshore Record

## Collection of transnational education (TNE) and UK-based award only provision on the HESA student record

This communication is to let you know of a change to reporting requirements for transnational education (TNE) provision and UK-based award only provision.

In September 2024, it was announced that the HESA student record would be expanded to collect [data about TNE and UK-based award only students](#) on an individual basis from 2026/27. The aim was to gain a better understanding about this provision for quality and regulatory purposes; to provide information to assess the risks associated with this type of provision; and to monitor compliance with our regulatory requirements.

We are no longer requiring that TNE and UK-based award only provision is collected on the HESA student record from 2026/27 and are pausing the requirement for this data to be returned to Jisc on an individualised basis, until further notice. Instead, we are requiring providers to return TNE data on the [expanded HESA Aggregate Offshore Record \(AOR\)](#) from 2026/27.

We are changing our approach to recognise that returning this data on an individualised basis would be particularly challenging at this time and in the current climate. This approach takes heed of the outcomes of the [independent review](#) of the implementation of Data Futures. It also responds to comments recently raised with us, where a number of providers have told us they will struggle to make the individualised return in 2026/27, due to available resource and other factors. We have considered whether using the expanded AOR return will meet our requirements and have concluded that, on balance, it will be sufficient for our needs as an interim arrangement. Analysis of data returned on the expanded AOR may lead to requests for further information if the information we require cannot be extracted from the expanded AOR data.

We will not be collecting data about UK-based award only data through the HESA records but will be obtaining that information through other means, such as regulatory returns, and will have further dialogue with providers about their UK-based award only provision where necessary.

Another reason for pausing our requirements for TNE data to be collected on an individual basis is so that all parties involved can concentrate on the successful implementation of in-year data collection. Our timetable for this is still being discussed but we can confirm that we will not require Welsh providers to return in-year data for 2027/28.

This approach means that the collection of TNE data will be consistent across the UK.

Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg, ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome correspondence in Welsh. Any correspondence in Welsh will be answered in Welsh, and corresponding in Welsh will not lead to a delay in responding.

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We recognise that over the past few years there has been a lot of change as a result of Data Futures being implemented. We regularly talk to student data contacts in providers about their concerns and welcome any feedback. Please contact us if you would find further conversations helpful or if there are any issues you would like us to address in our provider-wide forums such as the Medr Student Record Review Group.

For further information, please contact Hannah Falvey, Head of Higher Education Statistics, [hannah.falvey@medr.cymru](mailto:hannah.falvey@medr.cymru).

Yours sincerely,



**James Owen**

Chief Operating Officer

Cc: Data contacts