
Higher education information sharing and data transparency duties

Department for Business, Innovation and Skills

RPC rating: fit for purpose

The IA is now fit for purpose as a result of the department's response to the RPC's initial review. As first submitted, the IA was not fit for purpose.

Description of proposal

The proposal will amend higher education providers' information sharing requirements, to reflect changes to the higher education landscape. This will ensure that information that is currently shared with the Higher Education Funding Council for England (HEFCE) will be shared with the Office for Students (OfS). The OfS will also be able to require bodies providing admissions services, such as Undergraduate Courses at University and College (UCAS), to provide data to researchers and others.

The proposal will also require higher education providers to publish information relating to application, offer and retention rates, broken down by gender, ethnicity and background. Approved providers that do not have 'Access Agreements' will also be required to publish an 'Access Statement' alongside this information. Together, these elements of the proposal are referred to as the 'Transparency Duty'.

Impacts of proposal

The main impacts come from: the requirement for admissions services to share data; and the costs to providers of publishing success data and Access Statements.

The main admissions service provider, UCAS, is within scope of the definition of community or voluntary body for the purposes of the business impact target. UCAS will experience a reduction in income as a result of being required to provide information that they can currently charge for. However, UCAS has been voluntarily sharing increased volumes of data, a trend that is assessed as continuing in the counterfactual. Any lost income would be at least partially offset by reduced costs for those currently purchasing data. The Department estimates that UCAS will experience a 7.5% reduction in revenues associated with current data sales, which would result in a loss of revenue of £0.31 million each year. However, based on the trend towards voluntary release of data, the Department estimates that only half

would be a direct result of the proposal (£0.16 million). The Department estimates that 50% of data sales are to business, so half the reduced revenue for UCAS will be offset by savings to businesses that no longer have to pay for data.

The Transparency Duty will introduce a range of costs. For the majority of institutions the data is already collected via UCAS, so there will be no increase in data collection costs. For the other institutions, the Department estimates an additional cost of £5 per application, with a total annual cost of £0.2 million, based on an average 40,000 non-UCAS applications each year. These organisations are also expected to face familiarisation and IT set-up costs. Based on a previous IA, the Department estimates that the 130 affected institutions will face average costs of £1,400, with a total one-off cost of £0.19 million.

Around 200 institutions will be required to produce an access statement. Collating the necessary information, in terms of staff costs, is estimated to be £283 per institution, based on the assumptions used in a previous IA.

All institutions will be required to publish data, for example through their website, and this is estimated to cost £180 per institution each year, with a total cost of £0.08 million, based on 450 institutions. This cost is expected to increase as the volume of providers increases, with an upper bound estimate of £0.1 million average annual cost.

The RPC is able to validate the estimated equivalent annual net cost to business (EANCB) of £0.6 million. The proposal is a qualifying regulatory provision that will be scored for the business impact target.

Quality of submission

Following the Department's response to the RPC's initial review of the IA, the RPC is able to validate the EANCB. As initially submitted, the IA failed to provide sufficient evidence to support some of the assumptions used. The revised IA, and supporting information provided by the Department, now provides sufficient information on how the estimates have been tested. While the RPC accepts the Department's comments regarding confidentiality of sources, the Department should consider whether further information could be included within the IA.

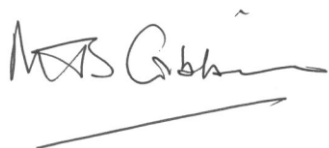
The IA now also includes a discussion of the familiarisation and transitional IT costs of the proposal. In addition to responding to the RPC's comments, the Department also adjusted the costs associated with data entry for the transparency duty reporting requirements, to reflect the fact that these costs will be incurred per application, rather than per student. These changes have resulted in a revised EANCB figure.

Departmental assessment

Classification	Qualifying regulatory provision (OUT)
Equivalent annual net cost to business (EANCB)	£0.3 million (initial estimate) £0.57 million (final estimate)
Business net present value	-£5.2 million
Societal net present value	-£5.5 million

RPC assessment

Classification	Qualifying regulatory provision (OUT)
EANCB – RPC validated ¹	£0.6 million
Business Impact Target (BIT) Score ¹	£3.0 million
Small and micro business assessment	Not required (low cost regulation)



Michael Gibbons CBE, Chairman

¹ For reporting purposes, the RPC validates EANCB and BIT score figures to the nearest £100,000.