

Office for
Students



HESES24 multiplication factors representations process guidance

**Submitting representations for
consideration**

Reference OfS 2024.44

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Summary

1. To enable the calculation of Office for Students (OfS) grants, all higher education providers that are registered with the OfS in the Approved (fee cap) category must complete one of the data surveys that will inform recurrent funding for the 2025-26 academic year. These are:
 - For a provider that has students registered with it in the 2024-25 academic year, the **Higher Education Students Early Statistics 2024-25 (HESES24) survey**.¹
 - For a provider that does not have students registered with it in the 2024-25 academic year, the **Higher Education Students Forecast 2025-26 (HESF25) survey**.²
2. As described in the 'Changes to 2024 student data surveys to inform funding' publication,³ the OfS will use data submitted in HESES24 and HESF25 to determine volume measures to inform funding allocation for the 2025-26 academic year. We will apply multiplication factors agreed in 2024-25 to determine the funding data for each provider.
3. This document provides information on the process by which providers can submit representations for consideration where they believe that the multiplication factors calculated by the OfS may not be appropriate due to significant changes in their provision compared to 2023-24.
4. Providers must submit representations to the OfS via the provider portal by **noon on Friday 14 February 2025** at the latest for inclusion in the initial grant announcement for the 2025-26 academic year.
5. Representations must be submitted using the multiplication factors sheets in the HESES24 workbook, accessible on the provider portal, and meet the criteria in this document.

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

¹ Guidance for the 2024 Higher Education Students Early Statistics (HESES24) survey can be found at www.officeforstudents.org.uk/publications/heses24/.

² For information, the latest guidance on the HESF return can be found at www.officeforstudents.org.uk/data-and-analysis/data-collection/hesf/.

³ See www.officeforstudents.org.uk/publications/changes-to-2024-student-data-surveys-to-inform-funding-notification-of-changes/ (OfS 2024.37).

Background

6. 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.
7. In 2022-23, the designated data body (Jisc) changed the specification for the Student record. As a result of the changes introduced, the OfS made changes to our data requirements. To reduce burden on providers, we announced several changes for the HESES23 survey (see 'Changes to 2023 student data surveys to inform funding'⁴):
 - a. Funding completion data (previously collected in Column 3 of the HESES workbook tables) would not be collected.
 - b. FTE data (previously collected in Column 4 and 4a of the HESES workbook tables) would also not be collected.

This reaffirmed a previous decision that there was no expectation for providers to maintain records on funding completion.⁵

8. Up to HESES22, the data collected for students included the completion and FTE assessments made above, and the resulting FTE values were used to determine funding for the following academic year. The removal of Columns 3, 4 and 4a meant that FTEs were not submitted in the HESES23 return and so a new method was required to determine the number of fundable FTEs to be used when calculating funding allocations; this method had to be consistent with the methods used in previous years.⁶
9. The OfS derived multiplication factors from provider data from recent years to apply to data submitted in HESES23. These multiplication factors allowed the HESES data to be converted to FTEs that could inform funding calculations. Providers were given the opportunity to submit representations on any multiplication factors which they thought to no longer be appropriate.
10. The multiplication factors were agreed as representative of the 2023-24 academic year following the representation process in May 2024. These factors were used by the OfS to

⁴ See www.officeforstudents.org.uk/publications/changes-to-2023-student-data-surveys-to-inform-funding-notification-of-changes/ (OfS 2023.33).

⁵ See www.officeforstudents.org.uk/publications/changes-to-2022-student-data-surveys-to-inform-funding-notification-of-changes/ (OfS 2022.35).

⁶ 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.

calculate fundable FTEs used in calculations for grant allocations for the 2024-25 academic year.

Multiplication factors

11. In determining funding FTEs to be used in calculating grant allocations for the 2025-26 academic year, we will use the existing multiplication factors agreed by providers in May 2024. Providers should review the multiplication factors which can be viewed on the FTE tables in the HESES24 workbook.
 - a. If the proposed multiplication factors are considered to be an appropriate representation of a provider's provision for the 2024-25 academic year, then no action is required.
 - b. If a provider believes that one or more of the multiplication factors may no longer be appropriate, then representations can be submitted to the OfS for consideration. Submissions should be made through the OfS portal using the FTE tables in the HESES24 workbook.
12. Although the multiplication factor representations worksheets are contained within the HESES24 workbook, please be aware that submitting representations is not required. The worksheets have been combined to ensure that the multiplication factors can draw from the latest provider data submitted in HESES24.
13. We have used individual multiplication factors for each category of OfS-fundable students reflecting all combinations of:⁷
 - Mode of study – these are full-time, sandwich year out or part-time
 - Price group – these are A, B, C1.1, C1.2, C2 or D (Tables 1, 2 and 3 only)
 - Profession of students on pre-registration health courses (Tables 6a and 6c only)
 - Length of year – this is either standard or long
 - Level of study – these are UG (Level 4 and 5), UG (Other), PGT (UG fee), PGT (Masters' loan) or PGT (Other). For Tables 6a and 6c, UG (Level 4 and 5) and UG (Other) are combined into UG (All).⁸
14. 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. In 2023-24, multiplication factors were derived from historical data. If providers believed that the OfS calculated factors were representative of their 2023-24 provision, then no action was required. The final multiplication factors used for 2023-24 were agreed as representative following the representations process.

⁷ Information on how multiplication factors have been derived can be found in Appendix 6 on the HESES webpage. See www.officeforstudents.org.uk/data-and-analysis/data-collection/heses/.

⁸ Multiplication factors for postgraduate research (PGR) years of engagement have not been calculated as they are all non-fundable.

16. For 2024-25, we will be using the finalised and agreed multiplication factors from the 2023-24 academic year. As noted above, if providers believe that those multiplication factors are no longer appropriate to use for the 2024-25 academic year, then they can submit representations to the OfS. Further information on the representations process can be found in paragraphs 23-47.

Multiplication factors for new provision

17. Where providers submit data in HESES24 for new provision, where a corresponding multiplication factor has not previously been applied, we will apply a multiplication factor based on historical data as described below.

18. There are six levels of aggregation which can determine the multiplication factors. If insufficient data is available at one level, then the next level with sufficient data will be used. Aggregation levels 4, 5 and 6 represent multiplication factors derived from sector-level data. Levels of aggregation for Tables 6a and 6c are determined using a variant of the method. More information on the multiplication factors and levels of aggregation can be found in Appendix 6.⁹

19. For Tables 1-3 in the HESES workbook, levels 1 to 6 are determined using the following variables:

- Level 1 – Provider, mode, price group, length, level of study and fundability status
- Level 2 – Provider, mode, price group, level of study and fundability status
- Level 3 – Provider, mode and level of study
- Level 4 – Sector, mode, price group, length, level of study and fundability status
- Level 5 – Sector, mode, price group, level of study and fundability status
- Level 6 – Sector, mode and level of study.

20. For Tables 6a and 6c, the levels of aggregation are:

- Level 1 – Provider, mode, profession, length, level and fundability status
- Level 2 – Provider, mode, profession and level
- Level 3 – Provider, mode and level
- Level 4 – Sector, mode, profession, length, level and fundability status

⁹ There are a limited number of areas where the OfS does not hold relevant historic data to calculate multiplication factors using the aggregation levels listed. In such situations, the workbook will show “other” for aggregation level and these multiplication factors will use a different methodology. All the information on the aggregation levels, including the limited ‘other’ categories, can be found in Appendix 6 on the HESES webpage. See www.officeforstudents.org.uk/data-and-analysis/data-collection/heses/.

- Level 5 – Sector, mode, profession and level
- Level 6 – 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 the workbook.

Timeline

24. Providers can submit representations to the OfS via the provider portal from the HESES24 census date until noon on 14 February 2025.¹⁰

25. If representations are made, 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 who will recommend a final decision to the appropriate decision maker.

27. The final multiplication factors for all providers will be confirmed following conclusion of the representations process.

Principles on which representations will be considered

28. We are aware that provision at higher education providers does not always remain static year-to-year. Significant changes to provision in 2024-25 may mean the multiplication factors agreed for 2023-24 may no longer be appropriate for determining the total FTE at a provider. To account for year-to-year changes, providers can make representations on the agreed multiplication factors being applied to 2024-25 data.

29. For representations to be considered they must meet the criteria outlined in paragraphs 30-36. 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.

30. To be considered, proposed alterations to the multiplication factors must have a significant and material impact on the indicative funding. The indicative funding figures shown in the HESES24 workbook are for information only and do not represent the actual funding figures that the OfS will allocate for 2025-26. Providers should use these pages to see how changes to multiplication factors might impact funding, but the figures displayed do not represent actual funding allocations.

31. We will be considering 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

¹⁰ Information on accessing the workbook and submitting representations to the portal can be found in HESES24 Appendix 1. See www.officeforstudents.org.uk/data-and-analysis/data-collection/heses/.

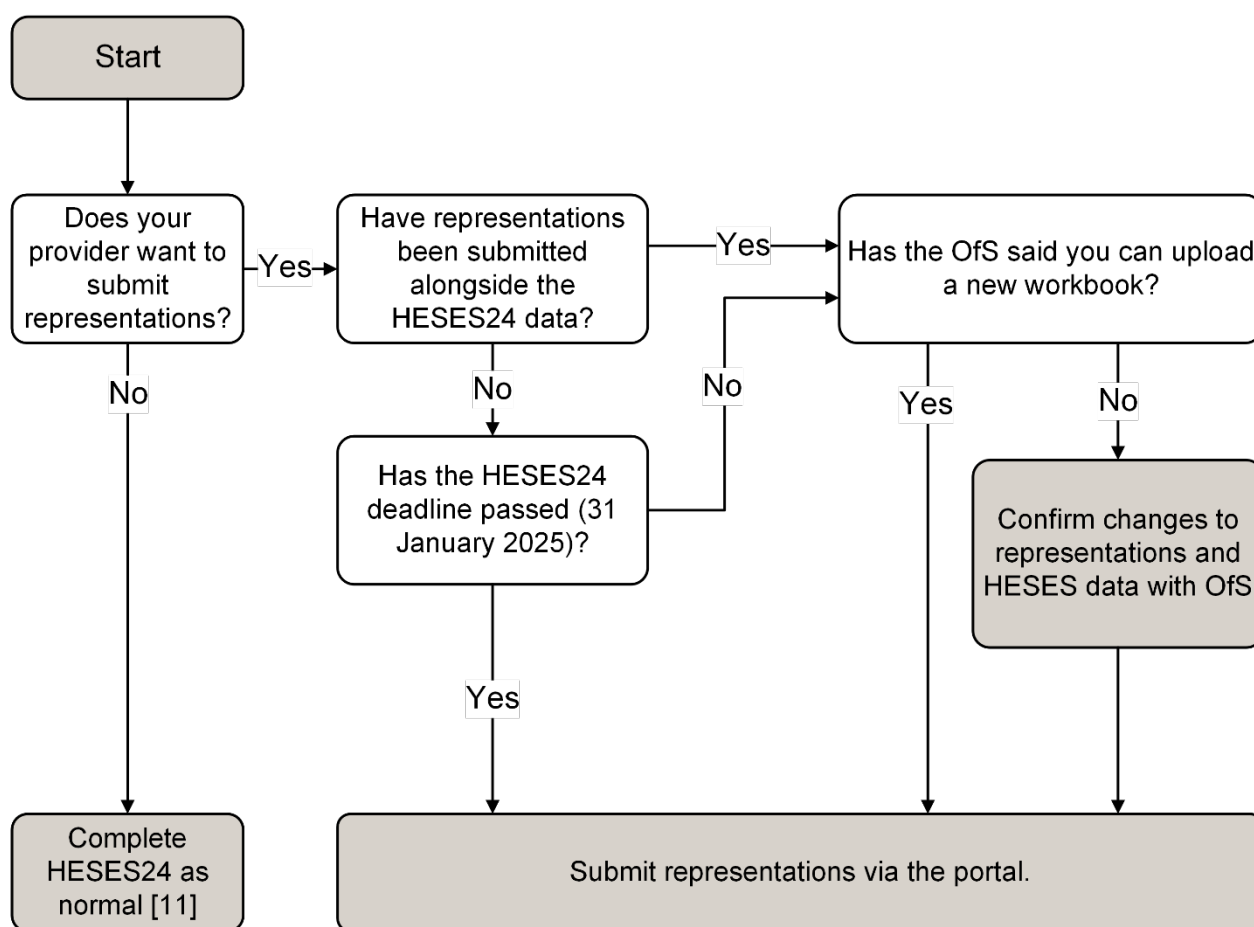
- b. A predicted change to funding based on the indicative funding tables contained within the representations workbook of at least 10 per cent of a provider's total funding allocation in 2024-25.
32. For representations on multiplication factors being applied to price group A, changes to multiplication 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. The OfS 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 4, 5 and 6).
 - c. where aspirations or targets are provided as the rationale for a change in the proposed multiplication factor.

Submission and review process

37. Providers should submit representations through the OfS portal using the multiplication factors representations sheet in the HESES24 workbook by noon on Friday 14 February 2025 for inclusion in the initial funding allocation for 2025-26. The accountable officer and appropriate senior staff should be aware that representations are being submitted. Any changes accepted will have an impact on provider funding for the 2025-26 academic year.
38. Providers can submit representations as many times as is required, but only the latest version of the representations received by the deadline of 14 February 2025 will be used. This means that if a provider updates HESES24 data during the data verification period, then the amended workbook will be the latest version submitted.
39. After the HESES24 deadline of 31 January 2025, providers will be able to continue to submit representations on their multiplication factors using the HESES24 workbook. However, any changes to the main HESES tables within the workbook will not be processed as will be shown in the results workbook.

40. If you want to upload representations after you have submitted HESES24 data, but before the HESES24 deadline (31 January 2025), you must have confirmation from the OfS that you can proceed before uploading. This is to prevent any accidental changes to HESES data and it reflects the existing HESES data verification process for submitting an amended HESES workbook.
41. If a provider needs to re-upload HESES24 data during the data verification period, and has already submitted representations, then the provider will need to ensure any representations which continue to be relevant are included in the revised workbook. See Figure 1 for further details on the submission process.

Figure 1: Submitting representations



Please note: If you are submitting amended HESES24 data and you have already included representations, the updated workbook should contain the most up-to-date representations as this will be the **latest** workbook we have received.

42. Data verification is only concerned with HESES24 data and the OfS 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 14 February 2025.

¹¹ Guidance on completing the HESES24 survey is available on the OfS website. See www.officforstudents.org.uk/publications/heses24/.

43. In order to guarantee inclusion in the summer grant announcement for 2025-26, providers must meet the deadline for submitting representations on 14 February 2025. If a provider wants to submit a representation after the deadline, they will be able to do so but we cannot guarantee that the outcomes of successful representations will be included in the initial 2025-26 allocation.

Reviewing representations

44. Representations meeting the criteria outlined in this guidance will be reviewed by a panel.

45. 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.

46. 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. Final multiplication factors and funding allocations for 2025-26 will be made available later in the 2024-25 academic year.

Further information

47. 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. Providers will be able to submit representations on each proposed multiplication factor. To do so, a new multiplication factor can be suggested. 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 providers decide what may be appropriate, we have provided a number of example scenarios. This is not an exhaustive list but gives providers 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 (Level 4 and 5), standard length 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 was closed for the 2024-25 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 2023-24.

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 (Other), standard length 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 2024-25 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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