

Dear [college principal – by first name]

### **Individualised Learner Record Data Management**

Last year Ofsted reported concerns raised by some colleges about data management practices employed by some colleges to maximise their success rates. This prompted a joint review by the LSC and Ofsted, to analyse Individualised Learner Record (ILR) data. This included seven fact finding visits to understand the extent to which college data management varies between institutions.

The review highlighted that colleges adopt various approaches to the completion of the ILR and interpret the ILR guidance differently, resulting in inconsistent and sometimes inappropriate reporting.

Issues identified include:

- different practices relating to the recording of ‘unfunded’ learners
- the failure to record all learning aims being undertaken by learners
- changes to planned end dates
- late changes to a learner’s programme of learning
- inappropriate use of the transfer code.

This work has shown that we need to tighten up the ILR guidance, and be clearer about its status to remove any ambiguity.

The information authority has begun the process of clarifying and strengthening the guidance. This will take time, but progress has already been made. Meanwhile, in the Annex to this letter you will find some guiding principles and explanations of a number of key points, which make clear our expectations for consistent and fair data management.

There are four detailed points that I would like to emphasise at this stage:

- There must be a learner record in the ILR for every learner and not just those that are LSC funded. Those learners who are not LSC funded should be clearly identified.
- Once a learner is recorded as LSC funded, this must not be changed in any circumstance unless the LSC, at a national level, explicitly states that this is permitted through further guidance.

- The learning planned end date field, (A28), must remain constant once completed. This is stated explicitly in the ILR specification
- Where a learning aim has a completion status of 'transferred to a new learning aim' there must be a corresponding data set in the ILR for the learning aim to which the learner has transferred. This is a mandatory requirement.

If the data management in your college varies from this practice, please ensure that this practice ceases with immediate effect. This applies in respect of all remaining ILR returns relating to 2008/09 and for 2009/10 onwards. We will include a more thorough analysis of ILR completion as part of the college funding audits which will be carried out later this year. If those audits reveal that a college has not been recording data in line with the guiding principles outlined in the Annex, this may trigger appropriate sanctions.

In view of the issues that this exercise has identified, I believe it is now timely to work with the sector to look at issues around data capture and success rates, and to agree a shared view as to the right and appropriate level of regulation and audit.

To that end I have written to Martin Doel, Chief Executive of the Association of Colleges (AoC), proposing the establishment of two project groups, one focussed on colleges. This group will include representation from colleges, the AOC, the data service, the information authority, Ofsted (as observers) and the LSC. We will ensure that the group represents the interests of all parts of the sector. The information authority, as custodians of the ILR, has been asked to chair the group.

If you have any questions about this issue please contact your Partnership Team.

Yours sincerely



**Geoff Russell**  
**Chief Executive**

(Agreed by and electronically signed in his absence)

## Annex

### Data Management and ILR Completion – Principles and Key Points for Clarification for Colleges

In conjunction with the information authority we have identified four principles which underpin our expectations of data management and in the returns that are made to us:

- **Accuracy**
- **Timeliness**
- **Completeness**
- **Consistency**

Data underpins funding and commissioning decisions, and it also underpins and informs the work of Ofsted and other agencies. When aggregated, it presents to our sponsoring departments and to the Government the progress and position of the sector, thereby informing policy making decisions.

Set out below is an articulation of the four principles and what each means in relation to completion of the ILR.

The points set out are specifically tailored to reflect our requirements of General Further Education Colleges, Tertiary Colleges and Sixth Form Colleges. A separate letter and annex has been prepared for other providers about this issue, since the requirements in respect of ILR completion differ for them in that colleges need to return data for non-funded learners, but other providers do not.

### Principles and Mandatory Requirements Underpinning Collection of the Individualised Learner Record

#### Principle

#### Mandatory Requirement

#### Accuracy

The ILR must accurately describe the provision delivered to each learner.

The ILR must accurately reflect the journey for the learner and what has happened. Inaccurate information must never be entered even where it is perceived that this would result in a more equitable claim for funding.

#### Completeness

The ILR must accurately *and comprehensively* reflect what is recorded in each learner's

For Colleges, there needs to be a learner record in their ILR for every learner and not just those that are LSC funded.<sup>1</sup>

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<sup>1</sup> Under the Articles of Government for FE Corporations the LSC has a role in relation to the audit of the college's accounts which is not confined to that part which relates to LSC funding. It states that the Corporation shall co-operate with any person who has been authorised by the LSC to audit any returns of numbers of students or claims for financial assistance and shall give any such person access to any documents or records held by the Corporation including computer records. The return in relation to students is not limited to those funded by the LSC. This, and the oversight that the LSC has over

learning agreement.

For all providers the learning agreement records the goals which the learner and provider have agreed. It is against these goals that the provider performance, in terms of success rate, should be recorded. It is recognised that the goal may be agreed during the first few weeks of learning but once set it must not be changed. It is reasonable to expect that the goal should be agreed within the 'funding start period' and not changed after that time.

The total guided learning hours for a learner recorded in the ILR must accurately reflect the guided learning hours the provider plans to deliver or actually delivers to the learner.

Where a single piece of learning leads to the achievement of more than one goal, the ILR must not contain learning aim data sets that include the same guided learning hours more than once. For example, where a piece of learning is delivered in a single course of 100 guided learning hours and leads to the achievement of two aims then the two learning aim data sets describing this should contain 100 guided learning hours in total.

### **Timeliness**

For any particular return, a provider must accurately describe in the ILR all provision delivered up to and including the collection reference date as published in the ILR specification. The provider may include data for provision delivered after the reference date. For employer responsive returns, which do not have reference dates, the provider must endeavour to return new starters, leavers and changes in a timely way.

In brief, the ILR should accurately describe the situation for the year up to and including the reference date. Data may include provision to be delivered after the reference date but no one should assume this data is complete or accurate.

**Consistency**

Many basic pieces of information about a learner and their learning must remain constant once entered in the ILR except where the information has been entered in error.

Examples of such fields include Home postcode field, (L17), Learning aim reference field, (A09), LSC funding field, (A10) and Learning start date field, (A27). The Learning planned end date field, (A28), must not be changed once set and this is stated specifically in the ILR specification.

These principles should underpin your approach to data management for 2009/10 and beyond.