



# Data Assurance Policy

Responsible Office	Academic Planning
Responsible Officer	Pro Vice-Chancellor (Academic Planning)
Approving Authority	Board of Governors
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Related Procedures	n/a
Related University Policies	Data Protection Policy
Amended (if applicable)	n/a
Supersedes	[New]
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## 1. Purpose

- 1.1 The purpose of this policy is to have in place robust arrangements for managing the quality of data collected, reported and used by both the University and external agencies.
- 1.2 This policy covers any data that is held in University-wide systems and used for external reporting. Data which is solely used for internal reporting or collected or used in the course of academic research by staff and students is out of scope of this policy.

## 2. Introduction and Definitions

- 2.1 The Higher Education sector is a data-rich sector and universities are increasingly looking for data to support a wider range of business questions, decisions and insights, while also supporting ongoing operational needs. Bath Spa University (BSU) is committed to achieving the highest standards of data quality and it is therefore important that it has a robust assurance framework in place to provide confidence in its data to internal users and external partners, stakeholders and relevant statutory bodies.
- 2.2 Data quality can be seen as the aspect of information management that focuses on information's integrity and fitness for purpose. With increasing use of joined up information systems, information sharing (digital or paper), public accountability and transparency, data quality is an essential aspect of information governance. The requirement to maintain good quality data held by BSU is covered by legislation and funding bodies, for example:
  - a. Data Protection Act 2018
  - b. Higher Education Statistics Agency
  - c. Office for Students
  - d. Competition and Markets Authority
  - e. Research England
  - f. UK Research and Innovation
- 2.3 Under the Data Quality Framework, data quality has six key characteristics or dimensions:
  - a. **Accuracy** – Data should be sufficiently accurate for its intended purposes. Accuracy is most likely to be secured if data is captured as close to the point of activity as possible. Data should be captured once only per academic year depending upon the data in question, although it may have multiple uses. The importance of the uses for the data must be balanced with the costs and effort of collection. Where compromises

have to be made on accuracy, the resulting limitations of the data should be clear.

- b. **Completeness** - Data requirements should be clearly specified based on the information needs of the body and data collection processes matched to these requirements. Monitoring missing, incomplete, or invalid records can provide an indication of data quality and can also point to problems in the recording of certain data items. It should also be relevant to the purposes for which it is used. This entails periodic reviews of requirements to reflect changing needs.
- c. **Uniqueness** - Data recorded should always be checked for uniqueness, to make sure that it appears once in a data set to avoid risk of duplication
- d. **Consistency** – Data should reflect stable and consistent data collection processes across collection points and over time. Users of the data should be confident that improvements reflect real changes rather than variations in data collection approaches or methods.
- e. **Timeliness** – Data should be captured as quickly as possible after the event or activity and must be available for the intended use within a reasonable time period.
- f. **Validity** – Data should be recorded in compliance with relevant requirements, including the correct application of any rules or definitions. Where proxy data is used to compensate for an absence of actual data, organisations must consider how well this data is able to satisfy the intended purpose. Data collection, storage and processing must comply with all related statutory and regulatory requirements including but not limited to data protection and data security.

2.4 In addition, the HESA Code of Practice for Higher Education data collections identifies three further principles for preparing relevant statutory data returns:

- a. **Honesty** – Data should genuinely reflect the characteristics, events, and objects being reported on, to the best of the University’s ability. Processes and systems to collect, prepare, and submit data should be designed to enable this. Providers should be transparent in all discussions of the data, and not withhold information that bears on their accuracy or interpretation.
- b. **Impartiality** – Data should be collected, prepared, and submitted with impartiality and objectivity. This process should never be influenced by organisational, political, or personal interests. HE providers should implement controls to ensure that those dealing with data collections are protected from such interests.
- c. **Rigour** – Data should be collected, prepared, and submitted using repeatable and documented processes that can withstand scrutiny.

When processes change, records should be kept of previous versions. Estimates and assumptions should be defensible, evidence-based, and documented, and the effect on the data tested. Assumptions and estimates should be reviewed regularly.

- 2.5 From a strategic perspective, having timely, accurate and reliable data reported externally is critical in order for BSU to:
- a. Provide a **Competition and Markets Authority-compliant tool** for informing, engaging and empowering students, families and educators.
  - b. Produce **accurate, accessible and comprehensive management information** on which informed decisions can be made to inform the future of the University.
  - c. Develop and maintain a **reputation that matches the quality of its academic provision** through, for example, the OfS Teaching Excellence and Outcomes Framework, university rankings and other external measures of performance.
  - d. Ensure the accurate calculation of the metrics used to test **compliance with the OfS B-conditions**.
  - e. Ensure **accurate funding allocations and to demonstrate accountability** to public and private funders and regulators.
  - f. Enable its **Audit and Risk Committee to give assurance** to the Board of Governors over the management and quality of data submitted to external bodies, as required under the OfS regulatory framework.

### 3. Roles and Responsibilities

3.1 There are a number of external reporting roles and responsibilities at BSU.

#### 3.2 The Board of Governors

The Board of Governors has responsibility for overseeing the conduct of the affairs of the University.

#### 3.3 Audit and Risk Assurance Committee

The Audit and Risk Assurance Committee is responsible for reviewing the effectiveness of the University's internal control systems. The Committee is required to give, as part of its annual report, its conclusions on the adequacy and effectiveness of the arrangements for the management and quality assurance of data submitted to the Higher Education Statistics Agency (HESA), OfS and other funding bodies.

#### 3.4 Internal Audit

The internal audit process ensures that satisfactory arrangements are in place for the management and quality assurance of data submitted to public bodies. The extent and nature of internal audit work on data management in any year will depend on the assessment of risk and the resources available.

### 3.5 Strategic Delivery Group

The Strategic Delivery Group or equivalent is responsible for reviewing this policy on a bi-annual basis. It will provide clear direction, visible support and promote data quality and accessibility through appropriate commitment and adequate resourcing to achieve the objectives of this policy.

### 3.6 Academic Board

The Academic Board has responsibility for the University's academic quality and standards and is responsible for the accuracy and completeness of the data used to underpin the Annual Quality and Standards Report that the Board of Governors use to provide assurance over the University's compliance with the OfS 'B' conditions of registration.

### 3.7 Vice-Chancellor

The Vice-Chancellor, as accountable officer, has overall responsibility for ensuring compliance with the OfS Conditions of Registration and regulatory framework. The Vice-Chancellor places reliance on the work of the designated key officers for the production of individual data returns to OfS, Higher Education Statistics Agency (HESA) and other relevant public bodies.

### 3.8 Chief Financial Officer

The Chief Financial Officer has overall responsibility for the data quality and accessibility of financial data held within the finance system and broadly within the University and is accountable for the University's HESA Finance Return and, with the Pro-Vice-Chancellor Research and Enterprise, the Higher Education the Business and Community Interaction return (HE-BCI).

### 3.9 Pro-Vice-Chancellor (Academic Planning)

The Pro-Vice-Chancellor (Academic Planning) has overall responsibility for the quality and accessibility of student and curriculum data and for the quality and integrity of the HESA Data Futures Return. This accountability is discharged through the Director of Student Recruitment and Marketing who is responsible for the accuracy and completeness of the admissions data, the Academic Registrar who has overall responsibility for the accuracy and completeness of student data held within the student record system and the Director of Data and Insights who is accountable for the compilation and completion of the University's student statutory external returns.

### 3.10 Director of Human Resources

The Director of Human Resources has overall responsibility for the quality and accessibility of staff data held with HR system and broadly within the University,

the staff data metrics included in the Research Excellence Framework and accountability for its HESA Staff Return.

### 3.11 Director of Estates and Services

The Director of Estates and Services has overall responsibility for the quality and accessibility of the University's estates and sustainability data, and accountability for its HESA Estates Management Statistics return.

### 3.12 Pro-Vice-Chancellor (Research and Enterprise)

The Pro-Vice-Chancellor (Research and Enterprise) has overall responsibility for the quality and accessibility of the University's research and enterprise data and accountability (with the CFO) for the quality and integrity of its HE-BCI return and for the data metrics required as part of the Research Excellence Framework exercise, in consultation with the CFO, Director of HR and Director of Data and Insights.

### 3.13 Centre for Educational Partnerships

Under HESA rules, all students registered for programmes under collaborative educational partnership arrangements led by the University should be included within its HESA Data Futures student record.

It is the responsibility of the Pro-Vice-Chancellor (Academic Planning), under their wider responsibilities for the quality of student data noted above, to ensure that relevant data from the University's Educational Partner Institutions is transferred to, and stored by, the University securely and in a timely way.

It is, however, the responsibility of the University's Educational Partner Institutions to ensure that data is collected, stored and processed within their own systems professionally and securely, and in a way that aligns to the structure of the University's systems. Post-transfer processing by the University should be minimal to enable efficient importing, and partner data should be able to be regularly reviewed or audited by the University on request for its completeness and overall quality.

Mechanisms for achieving this could include, but are not be limited to, explicit contractual terms within the partnership agreement and the monitoring of these responsibilities within the University's normal partnership health check arrangements. It is the responsibility of the University's Centre for Educational Partnerships, under the guidance of the Pro-Vice-Chancellor (Academic Planning), to ensure that appropriate training and mechanisms are in place with each partner to provide confidence in the completeness and quality of the data required to fulfill the University's statutory and regulatory obligations.

### 3.14 Director of Data and Insights

The Director of Data and Insights has overall responsibility for reviewing and reporting on compliance with the data quality policy and procedures and liaising with the appropriate officers to rectify any non-compliance; developing the

performance management framework to incorporate data quality and promoting the importance of data quality and accessibility throughout the University.

### 3.15 All Staff

It is the responsibility of all staff who input, store, retrieve or otherwise handle data to ensure that it is of the highest quality and processed properly and securely in accordance with the University's Data Protection Policy. It is the responsibility of all staff to abide by the key characteristics of good quality data as set out above. All members of staff are responsible for recording changes to their personal data in a timely way, either by using the University's systems or by notifying the appropriate internal department.

## 4. Oversight and Governance of Data Quality

4.1 The University's data quality assurance process is overseen by the University Data Assurance Group (UDAG), which has the responsibility for the oversight of relevant processes and systems, and the returns review process, to ensure accurate and valid external data returns. It is chaired by the Deputy Vice-Chancellor and has a reporting line into the University's Strategic Resources Group.

4.2 Members of UDAG include, but is not limited to, the senior return owners noted above and the Director of Data and Insights. The Group liaises with those responsible for risk, assurance, data governance, data protection and data security at the University level. Individual return compilers can and should be invited to discuss any matters of detail with their returns.

4.3 The Group should meet as required but at least annually to review and, where necessary, update this framework and the management controls in appendix 1. It should also consider the University's annual data quality assurance report that is used by Audit and Risk Assurance Committee as part of its wider assessment of the effectiveness of the University's risk management process and internal controls.

## 5. Data Assurance Process for External Returns

5.1 The process for compiling high-quality external returns starts with how data is collected. Data should be collected efficiently and under a 'right first time' principle, and the University's core student, finance, HR and estates systems should provide a single source of the truth for both internal and external reporting. Where possible, these systems should enable validation of entered data at the point of entry and verification by the subject through self-service

access. It should be reviewed at regular and appropriate points in the academic cycle and exception reports prepared following each review point to enable a continual cycle of improvement to be applied to data used for external reporting through the academic year.

- 5.2 Once a return is produced and ready for submission, the Director of Data and Insights (or otherwise nominated Professional Service Director) undertakes an independent review of the summary statistics and key year-on-year changes to each return. The focus of the review is on evaluating the credibility, reasonableness and impact of the return in terms of its financial and/or reputational risk. Under a risk-based approach adopted by the University, returns with a high risk will require a higher level of management and scrutiny than those with low risk.
- 5.3 Once this review has been completed and any adjustments made to the return, the Director of Data and Insights (or relevant Professional Service Director) confirms in writing to the Deputy Vice-Chancellor that the data contained in the return is accurate and compliant with the requirements of the relevant funding body. It is also confirmed at this time that the management controls listed in Appendix 1 have been undertaken. These controls have been approved by the relevant senior return owner, who is accountable for their application.
- 5.4 Once the Deputy Vice-Chancellor has reviewed the data and assured themselves that the return is accurate and compliant with the requirements of the relevant funding body or external agency, they recommend to the Vice-Chancellor that the return be submitted and signed-off. If the Vice-Chancellor has questions of detail relating to the return, then the Director of Data and Insights will meet with the Vice-Chancellor to answer any questions and provide any necessary assurance or take forward any follow-up actions as required.
- 5.5 Those noted above who are responsible for the University's statutory returns ('senior return owners') are expected to raise issues arising from the production of data with the Deputy Vice-Chancellor and Director of Data and Insights so that these can be discussed and resolved. The Deputy Vice-Chancellor will then instigate any required action and, through the Director of Data and Insights, co-ordinate between relevant senior return owners over issues as required.
- 5.6 The senior return owners receive reports from the internal auditors and funding bodies on audits of data systems and processes as required. They are responsible for putting in place agreed management actions in response to recommendations.
- 5.7 A brief (max 2-side of A4) written summary of the process to compile each return along with the controls used to assure their quality, relevant summary statistics and information and key changes year-on-year should be prepared for the Strategic Resources Group to consider prior to final sign-off of any given return. This summary should also indicate any forecast impact of year-on-year changes on the University's financial position and key external metrics that inform rankings and other measures of University reputation.



**APPENDIX 1: Data Assurance Management Controls**

Data assurance for funding bodies - evidence to demonstrate data reconciliations and analytical reviews of the data before submissions.

<b>Return</b>	<b>Key Officer</b>	<b>Return Submission Date</b>	<b>Management Controls through the academic year</b>
HESA Data Futures Student Return	Director of Data and Insights	October	<ul style="list-style-type: none"> <li>• Regular data quality check ins and reporting throughout the academic year and liaison with key stakeholders including review of provider profile</li> <li>• Annual review of guidance published</li> <li>• Regular team meetings to review progress and resolve problems.</li> <li>• Regular analysis of the content of fields produced in HESA extractions and instigation of actions to remedy as per HESES return.</li> <li>• Standard checks undertaken for PI, funding and league table purposes.</li> <li>• Standard exception reports run throughout the year to highlight and correct data errors.</li> <li>• Comparison with HESES populations and provide comment on significant variances in relation to the data.</li> <li>• Review of responses to IMS queries in relation to the IRIS files which are created automatically when a new XML file is submitted to the HESA portal</li> <li>• Work with the software supplier to steer the development of the student records system to support HESA.</li> <li>• Consistency checks for data errors such as student duplication or deletion Use of validation and credibility tools to ensure returned data is valid, credible and to carry out further checks and explanations if data raises any flags</li> <li>• Consistency checks with the Provider Profile, HR and Finance to ensure students, staff and finance costs are aligned in correct cost centres.</li> <li>• Stakeholders engaged with the status of the return.</li> <li>• Regular attendance at OfS/JISC/HESA Student training events for all team members and engagement with HESPA / SROC</li> </ul>
HESA Staff Return	Director of HR and Director of Data and Insights	November	<ul style="list-style-type: none"> <li>• Participation in regular provider profile reviews</li> <li>• Regular review of HESA return specification to determine impact on HR system and data collection requirements for new and amended data items.</li> </ul>

			<ul style="list-style-type: none"> <li>• Annual email to staff to ask them to check their individual staff data record</li> <li>• Monitor missing data and work with HR teams to ensure this information is collated and inputted correctly</li> <li>• Annual cost centre and academic subject review to ensure consistency with Student return to ensure staff are allocated to correct cost centres.</li> <li>• Standard HESA validation reports run throughout the return preparation period to highlight and correct data errors.</li> <li>• Analysis to ensure data in the return is consistent with other sector data collections; e.g. UCEA Pay Survey contract levels.</li> <li>• Standard HESA commit level undertaken for data quality and league table purposes i.e. SSR information.</li> <li>• Liaison with HR teams and relevant departments to identify proportion of academic-related staff contracts attributable to teaching to get the correct Student Staff Ratio.</li> <li>• In REF years, liaison with Research Office to ensure HESA return reflects the correct state of REF data.</li> </ul>
HESA Finance Return*	Chief Financial Officer	January	<ul style="list-style-type: none"> <li>• Participation in regular provider profile reviews</li> <li>• Annual review of guidance published by HESA &amp; review of revisions to return</li> <li>• Reconciliation of financial statements to completed return</li> <li>• Source data from finance system, staff and student HESA returns</li> <li>• Review of changes in the business and assessment of categorization in HESA FSR</li> <li>• Independent year on year analytical review performed prior submission</li> <li>• HESA validation process completed</li> <li>• Liaison with Research Office to ensure HESA return and HEBCI return are in alignment (noting that KEF data is drawn from HEBCI data in KEF years)</li> </ul>
HESES Return	Director of Data and Insights	December	<ul style="list-style-type: none"> <li>• Completion of a late November HESES dry run to ensure accuracy of data, logic and final projections.</li> <li>• Review the University populations against enrolment forecasts and projected intake against budgeted targets for the session.</li> <li>• Internal consistency checks for data errors, such as student duplication, or deletion.</li> </ul>

			<ul style="list-style-type: none"> <li>• Use of validation and credibility tools to ensure returned data is valid, credible, and to carry out further checks and provide explanations if data appears dubious.</li> <li>• Use of comparison tables to highlight variances from previous HESES return, HESA student return to carry out further checks and provide explanations if there are significant variances.</li> <li>• Review the curriculum against the agreed departmental structure and for any significant changes through the provider profile review to ensure alignment.</li> </ul>
TRAC Return	Chief Financial Officer	January	<ul style="list-style-type: none"> <li>• Validation against the annual accounts that have been subject to External Audit.</li> <li>• Comparison with previous year's data and reasonableness reviews regarding significant variances.</li> <li>• Comparison of key indicators with peer group institutions.</li> <li>• Internal reporting of more detailed benchmarking of performance with peer group institutions.</li> <li>• Regular team meetings to review progress and resolve problems.</li> <li>• Consult with university colleagues on the suitability of using TRAC data internally for decision making.</li> <li>• Briefing document on the TRAC Return to raise awareness of the importance of TRAC amongst senior managers within the University.</li> <li>• Comparison with data collected via the workload planner compared with the TRAC requirements.</li> <li>• Oversight and independent review through the TRAC Steering Group.</li> </ul>
Research Excellence Framework	Pro-Vice-Chancellor Research and Enterprise	Periodic	<ul style="list-style-type: none"> <li>• Oversight through the REF Steering Group (chaired by Provost) and an EDI Group that manages the Equality Impact Assessment in liaison with relevant departments</li> <li>• Internal Consistency checks on data included within the HESA staffing and HESA Finance returns</li> <li>• Data collection and analysis on EDI metrics in consultation with HR and the Data and Insights team, including EIA requirements</li> <li>• Data collection and analysis in relation to research outputs metadata taken held in the University repositories, in consultation with the library</li> <li>• Regular team meetings to review progress and resolve problems between</li> </ul>

			<p>Data and Insights, HR, Finance, Library and Research and Enterprise as appropriate</p> <ul style="list-style-type: none"> <li>• Consult with academic schools on REF narrative sections, and data inclusion</li> <li>• Internal consistency checks for data errors</li> </ul>
Teaching Excellence Framework	Pro-Vice-Chancellor Student Experience	Periodic	<ul style="list-style-type: none"> <li>• Oversight through the TEF Taskforce</li> <li>• Undertake internal data analysis on the University's Office for Students TEF Data Dashboard in consultation with relevant departments</li> <li>• Internal Data Collection and Analysis to provide additional data relating to student experience and student outcome measures to demonstrate evidence of impact</li> <li>• Regular team meetings to review progress and resolve problems between Data and Insights, Library, Student and Wellbeing Services, Learning, Innovation and Skills, Student and Registry Services as appropriate</li> <li>• Consult with stakeholders including academic schools on TEF submission, and data inclusion</li> <li>• Internal consistency checks for data errors</li> </ul>
HESA HEBCIS Return	Pro-Vice-Chancellor Research and Enterprise	January	<ul style="list-style-type: none"> <li>• Regular team meetings to review progress and resolve problems.</li> <li>• Ensure the templates for the financial and strategy elements of the return are divided up and distributed to data providers along with guidance and definitions.</li> <li>• Internal consistency checks on finance data (Part A) and strategic questions (Part B) from previous years.</li> <li>• Analyse the content of the strategy questions and ensure the appropriate staff (should a question be related to another department) are providing the answers to the question.</li> <li>• Consult with University colleagues on the impact of other returns on the HEBCIS return</li> <li>• Undertake general benchmarking of HEBCIS outputs across the sector and by year and align with KEF as relevant</li> </ul>
Estates Management Statistics	Director of Estates and Services	February	<ul style="list-style-type: none"> <li>• Maintenance of Estates data sources and staff contact and location information list.</li> <li>• Data collection co-ordination and Estates data quality checking, including investigation of any results that are significantly different to the previous year.</li> </ul>

			<ul style="list-style-type: none"> <li>• Response and addressing of any HESA data quality queries prior to submission and Estates sign-off.</li> <li>• Estates sign-off meeting prior to institutional sign off</li> </ul>
National Student Survey	Pro-Vice-Chancellor Student Experience	November	<ul style="list-style-type: none"> <li>• Undertake checks with the draft NSS population with academic schools</li> <li>• Comparison undertaken with the draft HESA Student return before the return is submitted to check that the draft NSS population corresponds to the student population we'd expect to see based on our student record data</li> <li>• Regular team meetings to review progress and resolve problems between Data and Insights and with Student Experience as appropriate</li> <li>• Final consistency checks to make sure final NSS file submitted includes all the records from the core NSS population file</li> </ul>
Graduate Outcomes Return	Head of Careers and Employability and Director of Data and Insights	June	<ul style="list-style-type: none"> <li>• Comparison undertaken with last year's return.</li> <li>• Comparison with the HESA return to see if it flags anything of insight into our data</li> <li>• Regular contact detail checks with Raiser's Edge database and data quality checks in preparation for the Graduate Outcome cohort submissions</li> <li>• Regular team meetings to review progress and resolve problems between Data and Insights and with Careers and Employability as appropriate.</li> <li>• Independent checks on the data undertaken by Careers and Employability team.</li> <li>• Sample checks undertaken on questionnaires by Careers and Employability Managers.</li> <li>• Careers and Employability meeting prior to institutional sign off</li> </ul>
HESA Provider Profile Return*	Director of HR, Chief Financial Officer and Director of Data and Insights	June	<ul style="list-style-type: none"> <li>• Regular review of cost centre allocations in line with taught modules</li> <li>• Comparison with previous year's data and review significant variances.</li> <li>• Use of HESA produced comparison tables to check consistency.</li> <li>• Standard HESA validation reports run throughout the return preparation period to highlight and correct data errors.</li> <li>• Liaison with HR and Finance to ensure that all cost centres to be returned in staff, finance, and student returns are included in provider profile return.</li> </ul>
HESA Unistats	Director of Data and Insights	July	<ul style="list-style-type: none"> <li>• Compliance with guidance to support the online upload of relevant datasets</li> <li>• Building relationships and preparation/planning</li> </ul>

HESA Aggregate Offshore Return	Director of Data and Insights	September	<ul style="list-style-type: none"> <li>• Regular team meetings to review progress and resolve problems.</li> <li>• Comparison with previous year's data and review significant variances.</li> <li>• Use of HESA produced comparison tables to check consistency.</li> <li>• Undertake preparations in readiness for future changes to this return as part of the Data Futures developments</li> <li>• Keep up to date with HESA/OfS guidance regarding the return being moved into the student return as more data might be required in line with the HESA student return</li> </ul>
Department for Education ITT returns	Director of Data and Insights	Quarterly: October, January, April and July	<ul style="list-style-type: none"> <li>• Regular team meetings to review progress and resolve problems.</li> <li>• Comparison with the previous returns and review significant variances</li> <li>• Liaison with School of Education Placement team as part of the regular data checks required by the Department for Education</li> </ul>
Access and Participation Plan annual return	PVC Academic Planning, Director of Student Recruitment and Marketing	October	<ul style="list-style-type: none"> <li>• Oversight by the Access and Participation Steering Group</li> <li>• Quarterly reviews of financial spend and commitments</li> <li>• Collection of relevant staff and student ambassador commitments and expenditure periodically and review of rationale that underpins the financial basis</li> <li>• Regular liaison with Finance and key stakeholders</li> </ul>