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## CONTENTS

1	Introduction .....	3
2	Purpose .....	3
3	Scope .....	3
4	Policy objectives .....	4
5	Risks .....	4
6	Policy .....	5
6.1	Responsibilities .....	5
6.2	Policies, procedures, processes, systems .....	5
6.3	Security .....	6
6.4	Data quality assurance .....	6
6.5	Training .....	6
6.6	Review and communication .....	7
	Annexe: Admissions .....	8
A.1	Introduction .....	8
A.2	Admissions – Specific Risks .....	8
A.3	Policy – Graduate Admissions .....	9
3.1	Responsibilities .....	9
3.2	Annual Changes Process .....	9
3.3	In Cycle Checks .....	9
3.4	Retention .....	9
A.4	Policy – Undergraduate Admissions .....	10
4.1	Responsibilities .....	10
4.2	Annual pre-cycle preparation .....	10
4.3	In Cycle Checks .....	10
4.4	Post-Offer and Confirmation .....	11
4.5	Reporting .....	11
4.6	Retention .....	11

Appendix 1: External Data Returns.....	12
Appendix 2: Glossary .....	13

## 1 INTRODUCTION

The University has a data quality and data quality assurance policy approved by Council<sup>1</sup> to ensure that the quality of the data it produces complies with internal and external requirements. The Academic Administration Division (AAD) is required to have its own data quality policy aligned with the University's policy, and to add its own requirements.

High-quality data is the result of creating a culture that understands the importance of data accuracy and that is embedded in the organisation's operational, performance and governance arrangements. Such a culture needs the correct processes, systems, responsibilities and training to be in place, and this policy is part of those requirements.

## 2 PURPOSE

The aim of the Student Data Quality Policy is to mitigate the risks identified in section 5 (below), and to support the University's overarching data quality policy. The policy should ensure that the AAD collects and produces data that accords with the University's high data quality standards.

The audit committee of a higher education institution (e.g., Oxford University's Data Assurance Group – DAG) needs to be assured that the institution's management has assessed the risks posed by data accuracy and availability and taken appropriate mitigation actions. A data assurance risk register<sup>2</sup> will be used for this purpose. In addition, care will be taken to guarantee the accuracy, validity, reliability, timeliness, relevance and completeness of the data, as well as compliance where required.

## 3 SCOPE

The AAD collects and produces data that is used by other University departments to create their own reports for use both within and outside the University. The AAD also uses data that is provided by other departments for its own internal and external reporting (e.g. student data held locally with departments and colleges, financial data, etc.).

The scope of this policy includes the data returns and reports compiled by the AAD and also by the University's Planning and Council Secretariat section, listed below:

- HESES return
- HESA Student return
- HESA ITT return
- HESA Aggregate Offshore return
- HESA Discover Uni (formerly Unistats)
- OfS Access and Participation Plan (APP)
- OfS Teaching Excellence Framework (TEF)

The policy applies to all staff involved in managing, entering and collecting data. Although the focus of this policy concerns student data, much of this information is initially captured as part of admissions processes and assuring the quality of data collected and stored during the admissions process is paramount. An annexe to the main policy refers directly to Admissions data.

Student data also supports a range of internal and external functions, and the Student Data Quality Policy will support all these areas – including, but not limited to:

- Fair and transparent admission processes

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<sup>1</sup> <https://governance.admin.ox.ac.uk/data-quality-and-assurance>

<sup>2</sup> Available at <https://governance.admin.ox.ac.uk/data-risk-management>

- Athena Swan
- Confirmation of student details for the Home Office (UKVI)
- Student Loans Company
- Charging and collection of student fees
- Processing student financial support
- Compiling philanthropic donor reports
- City Council Tax and Electoral Register details
- Provision of data to third parties under the requirements of the Freedom of Information Act
- Student support and welfare
- Administration of student surveys
- Annual and termly registration of all students
- Processing of student data in the Virtual Learning Environment (CANVAS)
- Fair and transparent examination processes
- Degree and confirmation purposes and provision of transcripts, certificates and degree confirmation letters
- Alumni contacts and relations
- Decision-making processes within the collegiate University (via the provision of information, data and modelling)
- Resource allocation
- Publication of admissions and students' statistics in the broader public interest
- Planning processes at various levels

## 4 POLICY OBJECTIVES

The data quality policy has six objectives:

- to ensure well-defined responsibilities;
- to ensure that proper policies, procedures, processes, systems and infrastructure are in place;
- to ensure the requisite level of security;
- to provide data quality assurance mechanisms;
- to ensure adequate training; and
- to ensure proper review and communication.

## 5 RISKS

There are several potential risks in the AAD that could result from producing and issuing inaccurate data:

- 5.1.1 Mandatory conditions of grants could be breached;
- 5.1.2 Data could give misleading internal and external impressions of institutional performance;
- 5.1.3 Poor data could result in inappropriate decision-making by management across the institution;
- 5.1.4 Inaccurate data could lead to students being charged inaccurate fees;
- 5.1.5 Inaccurate data could lead to incorrect information about academic performance being provided to third parties;
- 5.1.6 Inaccurate data could lead to insufficient support (practical, financial, welfare related, or other) being provided to students;

- 5.1.7 Inaccurate data could lead to students being refused a visa if the CAS is incorrect or being issued with the wrong visa end date. If a visa is issued for too short a time, the University may incur costs to reimburse the student for an additional visa application;
- 5.1.8 Inaccurate data could lead to under-funding;
- 5.1.9 Inaccurate data could lead to over-funding with subsequent claw-back of overpaid funds which, if significant, could impact adversely on the institution's financial health;
- 5.1.10 An institution which submits inaccurate data could suffer reputational damage with public and private funders, other stakeholders and the public. In turn, this could generate additional and burdensome attention placed on the institution.

## 6 POLICY

The following points constitute the policy:

### 6.1 RESPONSIBILITIES

- 6.1.1 The Academic Registrar delegates to a senior individual (Deputy Registrar) the responsibility for ensuring data quality and compliance with the University policy on data quality and data assurance.
- 6.1.2 The Deputy Registrar, or delegated nominee, represents the AAD at the DAG.
- 6.1.3 AAD sections will review annually to ensure that they have appropriate policies, systems and procedures to secure the quality of the data they record and use for their reporting for each of their returns. This includes effective communication with other areas of the AAD to ensure appropriate standards for data quality are maintained. Controls should be reviewed annually using the DAG risk registers to ensure they are working effectively and the outcome of the review should be reported to the DAG.
- 6.1.4 The person responsible for producing each external data return should also be responsible for producing a data assurance risk register for each return, using the template produced by the University.<sup>3</sup> The risk register should be based on a risk assessment. This procedure should be used for every other significant return or report.

### 6.2 POLICIES, PROCEDURES, PROCESSES, SYSTEMS

- 6.2.1 Major pieces of work which will be submitted to public bodies should always be subject to a formal review process, including the sign off of the HESA returns.
- 6.2.2 AAD sections will ensure that data submission processes focus on securing data which is accurate, valid, reliable, timely, relevant and complete.
- 6.2.3 AAD sections will ensure that information systems have built-in controls to minimise the scope of human error or manipulation and prevent erroneous data entry, missing data or unauthorised data changes.
- 6.2.4 AAD sections will work closely with IT projects and other teams delivering system changes to ensure that any new developments mitigate the risk of changes to data flows introducing new data quality concerns.
- 6.2.5 AAD sections will put in place arrangements that are focussed on ensuring that data underlying any reported information are actively used in decision-making processes and are subject to a system of internal control and validation.

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<sup>3</sup> Available at <https://governance.admin.ox.ac.uk/data-risk-management>

- 6.2.6 Education Services - Student Records will work closely with Planning and other areas of the University that manage student data, to monitor data quality, particularly for data supplied to public bodies.
- 6.2.7 AAD sections will work closely with IT Services to ensure that the accuracy of data stored within the data warehouse is maintained and monitored.
- 6.2.8 AAD sections will encourage the efficient use of data by staff across the collegiate university through enhanced reporting mechanisms to improve data quality.

### 6.3 SECURITY

- 6.3.1 Data covered by this policy should not be disseminated inside or outside the AAD other than by the Head of the AAD Section, or with the knowledge of them, except where the confidentiality level allows it, or the dissemination is within parameters previously agreed with the Head of the AAD Section.
- 6.3.2 AAD sections will be responsible for ensuring that appropriate levels of security are in place to protect data and that they are in line with University and/or departmental policies.
- 6.3.3 AAD sections will ensure that data is stored in a secure environment not accessible by unauthorised users or systems, and that appropriate backup mechanisms and contingency measures exist to guarantee business continuity.

### 6.4 DATA QUALITY ASSURANCE

- 6.4.1 A risk assessment will be carried out for all statutory returns by the individual in charge of the return.
- 6.4.2 The individual should review and update the data assurance risk register on an annual basis, in advance of submitting the return.
- 6.4.3 All data assurance forms will be approved by the Deputy Registrar.
- 6.4.4 Where the return is produced for external use, the data assurance form will be submitted to DAG in line with the University's Data Quality and Data Assurance policies.
- 6.4.5 Where data is estimated the reasons for the estimation should be clearly stated.
- 6.4.6 Audit files should be kept for each return which contains evidence of the source of the data and the scrutiny process. Audit files could be memos, reports, annotated final reports, etc.
- 6.4.7 Where the AAD makes a data return that relies on data obtained from other University departments, the data is expected to have been subjected to an appropriate data quality check by the issuing department. The issuing department will be expected to confirm that the data is appropriate for the use proposed and is appropriately assured. The AAD will undertake rudimentary validation checks against similar data issued previously to identify potential inconsistencies.

### 6.5 TRAINING

- 6.5.1 AAD sections will put in place arrangements to ensure that members of staff have the knowledge, competencies and capacity for their role in relation to data quality. This will be achieved by maintaining an up-to-date training policy and through the personal development review process.

## 6.6 REVIEW AND COMMUNICATION

- 6.6.1 The Student Data Quality Policy will be reviewed on an annual basis and/or when there is any updating of the University's overarching policy.
- 6.6.2 The AAD will ensure that this policy is available and communicated to all stakeholders.

## ANNEXE: ADMISSIONS

### A.1 INTRODUCTION

Data captured at the admissions stage form the core of the student record and are key to the data quality of the student record. These data are used extensively for successful applicants who go on to enrol, for example as part of the University's statutory returns identified in section 3 above.

The aim of the student data quality policy – admissions annexe is to mitigate the specific risks associated with admissions data identified in section A.2 (below), and to support the overarching student data quality policy.

### A.2 ADMISSIONS – SPECIFIC RISKS

There are several risks in the AAD that could result from producing and issuing inaccurate admissions data:

#### 2.1 Financial and Statutory

- 2.1.1 Reporting and analysis may be inaccurate where data is not retained or in an unsuitable format
- 2.1.2 Inaccurate management of offer and intake targets could impact on colleges/departments financially if too many/few students are recruited, as well as adversely impacting the student experience
- 2.1.3 New and changing statutory requirements (e.g. Access and Participation plans and transparency data) require accurate data, or they could misrepresent the University to statutory bodies

#### 2.2 Accessibility

- 2.2.1 Applicants could be rejected in error or not offered funding
- 2.2.2 Inaccurate contextual data could lead to an applicant's performance not being correctly contextualised, and therefore that disadvantaged applicants may not be successful in gaining a place
- 2.2.3 Inaccurate data on an applicant's disabilities could mean the student's application is not assessed in line with accessibility regulations, leading to an appeal or legal case

#### 2.3 Equity

- 2.3.1 Underqualified students may be accepted onto courses, particularly where they have been accepted on the basis of grades in an overseas qualification, which may be misinterpreted
- 2.3.2 Inaccurate course information might encourage/discourage applicants from applying or taking up places
- 2.3.3 Inaccurate course pages might lead to applications not being considered ready for assessment by the time the course closes

#### 2.4 Reputational

- 2.4.1 Inaccurate data (e.g. qualifications on entry) could result in inappropriate placing in league tables
  - 2.4.1.1 Inaccurate data in the Annual Admissions Statistical Report (undergraduate) could have reputational implications
- 2.4.2 Lack of understanding of common business definitions e.g. "school type" could lead to lack of understanding of presented data, and therefore inaccurate conclusions being drawn



## A.3 POLICY – GRADUATE ADMISSIONS

The following points constitute the policy for Graduate Admissions:

### 3.1 RESPONSIBILITIES

- 3.1.1 The Academic Registrar delegates to a senior individual (the Director of Graduate Admissions) the responsibility for ensuring graduate admissions data quality and compliance with the University policy on data quality and data assurance.

### 3.2 ANNUAL CHANGES PROCESS

- 3.2.1 As part of its 'Annual Changes' process, the Graduate Admissions Office will review annually to ensure that they have appropriate policies, systems and procedures to secure the quality of the data they record and use for their admissions process, as well as ongoing reporting.
- 3.2.2 The 'Annual Changes' project captures changes for the following admissions cycle, including which courses are running, the application deadlines they use and the course information on the graduate admissions website. Changes are submitted directly on eVision. Key stakeholders, e.g. the Disability Advisory Service and Visa and Immigration Team, are consulted to elicit any changes to guidance.
- 3.2.3 Each year data collected at admissions which is directly linked to data collected in statutory returns is reviewed, e.g. ethnicity and disability information, to ensure that up to date coding and mapping structures are in place.
- 3.2.4 Data submitted by departments and colleges are checked by the Graduate Admissions Office prior to the start of the admissions cycle to identify anomalies. The Graduate Admissions Office also tests the updated graduate application form prior to go-live to ensure that data is captured and imported accurately.
- 3.2.5 The Graduate Admissions Office tests the separate Said Business School application form and checks that applications are imported correctly to SITS Vision. The Graduate Admissions Office maintains comprehensive process documentation for those applications that are data entered rather than submitted online.

### 3.3 IN CYCLE CHECKS

- 3.3.1 Where course information is amended during the application cycle, submitted and in-progress applicants are contacted to ensure they check the updated information.
- 3.3.2 Data quality monitoring reports, e.g. missing qualifications on entry data, are regularly run to ensure the completeness of key data that is reported outside the University.

### 3.4 RETENTION

- 3.4.1 The Graduate Admissions Office will adhere to Student Record Retention Policy, in addition to participating in its annual update.

## A.4 POLICY – UNDERGRADUATE ADMISSIONS

The following points constitute the policy for Undergraduate Admissions:

### 4.1 RESPONSIBILITIES

- 4.1.1 The Academic Registrar delegates to a senior individual (the Director of Undergraduate Admissions and Outreach) the responsibility for ensuring undergraduate admissions data quality and compliance with the University policy on data quality and data assurance.

### 4.2 ANNUAL PRE-CYCLE PREPARATION

- 4.2.1 As part of the annual UCAS courses roll-over in May the Undergraduate Admissions and Outreach (UAO) and Astrophoria Foundation Year teams review the set-up of course/college combinations on UCAS. This is to ensure undergraduate applicants select a correct combination when applying to us. This process also ensures that course information on UCAS Search and UCAS Apply accurately reflects the information on the undergraduate admissions web pages with regards to tests, entry requirements and any additional details.
- 4.2.2 The annual ADSS (Admissions Decision Support System) go-live arrangements include preparation of contextual data and updates to reference data, course/college combinations, admissions tests and the library of standard offers. UAO and ADSS Project team make these changes in the production environment. Parallel updates in SITS:Vision are escalated to second line support at Education IT.
- 4.2.3 Both ADSS and SITS:Vision are prepared for a new cycle of applications in early September and require involvement from ADSS Project and IT Services. UAO ensures the accuracy and reliability of the applications data in both ADSS and SITS:Vision.

### 4.3 IN CYCLE CHECKS

- 4.3.1 UAO monitors the course-specific data entry collection on ADSS between the annual launch of the system to the collegiate university in October and the release of final decisions in mid-January. Departmental admissions coordinators are responsible for the setup of the course-specific data entry fields in ADSS and are guided and supported by UAO. The course-specific data includes assessment scores - UCAS pdf scores, tests, written work, portfolio grades, interview grades and so on. The data entry to ADSS is carried out by admitting tutors, college administrators/tutor for admissions and admissions coordinators and the relevant level of permissions is managed by UAO. The data entry for non-ADSS departments (currently MML and Physics) is carried out by manual data transfer between ADSS and satellite systems.
- 4.3.2 UAO and SDMA have shared responsibility for processing contextual data on ADSS. External data sources are used to drive contextualisation of applicants. The accuracy of these data is dependent on the external provider. These data are assessed and agreed by SDMA and UAO prior to loading into ADSS.
- 4.3.3 ADSS has embedded functionality to produce some aspects of the individual level contextual data, such as contextualised GCSE grades, contextual scores and bands (composite measures). A significant proportion of the data, however, is computed offline by UAO and is imported to ADSS.

- 4.3.4 UAO is responsible for the accuracy of data transmitted between ADSS, SITS:Vision and UCAS. This happens at four key stages: a) open college allocation, b) deselection after interviews are over, c) offers, and d) rejections.
- 4.3.5 UAO maintains comprehensive process documentation on all areas of data transfers between ADSS, SITS:Vision and UCAS.

#### 4.4 POST-OFFER AND CONFIRMATION

- 4.4.1 Colleges are responsible for verifying qualifications on entry on eVision (web interface of SITS:Vision). UAO maintains comprehensive process documentation on all areas of this process in the Admissions Handbook.
- 4.4.2 UAO is responsible for accuracy of data transmitted between UCAS and SITS at the confirmation stage, although some aspects of this work are managed by the Data Quality Team and IT Services.

#### 4.5 REPORTING

- 4.5.1 The UG Admissions reporting is based upon the Definitive Dataset (DD) and a Data Warehouse (DWH); both datasets are derived from ADSS and SITS:Vision.
- 4.5.2 The creation of DD is a manual process and there is a risk of introducing errors during this stage. Certain data items may be restated in the DD so will no longer correspond with ADSS, some data is derived or calculated in the DD that does not exist in ADSS, and some data items have very loose data definitions that may lead to inaccuracy or misinterpretation.
- 4.5.3 The Data Warehouse is a recent joint development by UAO and SDMA and is a robust repository of granular undergraduate admissions data, which archives historic data and complies with associated data management governance to support the needs of statutory, operational reporting and analytics related to undergraduate admissions data.
- 4.5.4 The Data Warehouse links to existing undergraduate admissions systems through an overnight refresh from ADSS and SITS:Vision. UAO and SDMA use the Data Warehouse as a primary source of extracting data for Admissions Process Reviews.
- 4.5.5 SDMA and UAO are scoping the decommission of DD in the coming years and will be using the DWH as a single source for historic undergraduate admissions data.
- 4.5.6 Both the DD and the DWH combine ADSS data from multiple admissions cycles to enable trend reporting. Owing to changing operational demands, certain data fields are not used consistently across different iterations of ADSS, which introduces a risk to data quality in these areas. This risk does not generally apply to the fields used for scheduled admissions reporting.

#### 4.6 RETENTION

The Undergraduate Admissions and Outreach team will adhere to Student Record Retention Policy, in addition to participating in its annual update.

## APPENDIX 1: EXTERNAL DATA RETURNS

Return Name	External Body	Deadline	Compiled By
Higher Education Students Early Statistics (HESES)	OfS	December	Planning and Council Secretariat
HESA Student	HESA	October	Data Quality Team
HESA Initial Teacher Training (ITT)	HESA	October	Data Quality Team
HESA Aggregate Offshore	HESA	November	Data Quality Team
HESA Discover Uni (formerly Unistats)	HESA	July	Data Quality Team
Financial Monitoring of Access and Participation activity	Office for Students	January	Undergraduate Admissions Student Data Modelling and Analytics
Teaching Excellence Framework (TEF)	Office for Students	N/A – not annual	Education Policy Support Student Data Modelling and Analytics

## APPENDIX 2: GLOSSARY<sup>4</sup>

asset	item, thing or entity that has potential or actual value to an organisation
data	facts about an object
data quality	accuracy, completeness, validity and currency of the data
dataset	identifiable collection of data
information	meaningful data
information system	applications, services, information technology assets, or other information handling components; includes software, hardware, data, people and procedures
infrastructure	system of facilities, equipment and services needed for the operation of an organisation
objective	result to be achieved
policy	intentions and direction of an organisation as formally expressed by its top level of management
procedure	specified way to carry out an activity or a process
process	set of interrelated or interacting activities which transforms inputs into outputs
quality	degree to which a set of inherent characteristics of an object fulfils requirements
return	report formally or officially on a specific matter
risk	effect of uncertainty on objectives
risk assessment	overall process of risk identification, risk analysis and risk evaluation
stakeholder	person or organisation that can affect, be affected by, or perceive themselves to be affected by a decision or activity
statutory requirement	obligatory requirement specified by a legislative body

<sup>4</sup> Sources: ISO 27000:2017, ISO 5000:2014, ISO 9000:2015, ISO 199115:2014, University of Oxford ITS494 project