

Data collections & returns

Background:

As part of its responsibilities as a Higher Education Provider, the School is required to collect and return a range of data sets relating to its finances, the student body, its staff, its estate and its research activity.

It is a requirement under *The Higher Education Code of Governance* that the governing body MUST seek assurance that the institution meets all legal and regulatory requirements imposed on it as a corporate body and MUST be in a position to explain the processes and the types of evidence used and provide any assurances required by funders.

Therefore, as a starting point, and part of Board members' ongoing induction, it would be useful for members to be aware of the types of data collection and returns undertaken during the year, where internal and external audits have been undertaken in respect of these returns, and areas where the School intends to make changes to its processes.

The Internal Audit's audit of Student returns generated an amber priority recommendations relating to overall arrangements for returns management in the School this is being addressed for the 2018/19 reporting cycle.

September 2018

Section 1: Student returns (Registry)

The internal audit department of the City of London undertook a general high level audit of the School's student returns in early 2018 and determined that there was an adequate control framework in place but there were weaknesses which might put some system objectives at risk.

HESA - Student Record Return (until 2020)

Compliance requirements

The data collected as part of the *Student record* is used extensively by various stakeholders and is fundamental in the formulation of:

- Funding
- Performance Indicators
- Publications (including UNISTATS)
- League tables

The *Student record* is collected in respect of all students registered at the School who follow programmes that lead to the award of a qualification or provider credit. The *Student record* collects individualised data about students active during the preceding academic year. A wide range of data items are collected, including: the student's entry profile and personal characteristics, module and course level data, funding information and qualifications awarded. There are differing requirements for different types of student, and for some students it is possible to make a reduced return, submitting only a subset of the fields of the *Student record*.

All data is stored within SITS, the student record system, and exported from there to form the HESA return.

Internal decision making

Most fundamental HESA decisions are historic and were made when HESA was first implemented in the School in 2005/6 and are still relevant. Minor decisions are agreed with the relevant stakeholder: finance, departments, registry and are implemented as appropriate – more noteworthy decisions are communicated to the Principal prior to signing off the data.

Quality Assurance/Audit

The *Student record* data that forms the basis of the return is subject to rigorous internal checks. Applicant and enrolment data forms the bedrock on which student progress data is built; applicants and enrolled students play a part in checking and updating their own data and legal identity and qualifications are checked for each individual by Registry staff.

On the assessment side each stage of the process - marking, moderating, inputting marks, programme assessment board reports, and School Board of Examiners reports – provides opportunity for scrutiny and reality check. Outside of assessment, student status changes (intermission, withdrawal, change of mode of attendance or programme) are subject to a stepped approval process before a change is implemented.

There have been no external data audits relevant to HESA.

HESA Data Futures (to replace the HESA student return from August 2020)

Data Futures is the biggest change in the history of HESA statutory reporting.

It is huge project requiring significant remodelling of the Schools' processes & systems. The project will take around 2 year to complete with yearly ongoing changes expected after competition alongside the management of the new continuous reporting cycle.

Overarching timeframe

The Principal will be required to sign off on the School being Data Futures ready in October 2019 and a mandatory trial Data Futures return will be require to be submitted in early 2020.

Data Future will then officially replace the current Student Record return from 1st August 2020.

Concepts

The key concepts of Data Futures are:

- Continuous reporting cycle throughout, which isn't restricted by academic year.
- Timely data, returned as close to the "event" as possible
- Each data entity (grouping of like individual pieces of data) will have an "in scope" period when HESA will be expecting to receive the data and when they expect to have that piece of data signed off by. There will be 3 sign off dates per year. Data within scope can be revised by submitting a revision or deletion.
- HESA is expecting data to be received daily, weekly, monthly etc. not necessarily in 3 big chunks around the sign off dates. [Cycle for the School yet to be determined.]
- Data is expected to be "known" at the point of returning it i.e. not an estimate
- To collect new and revised data sets not previously collected
- The use of data errors & warnings will be removed and replaced with tolerance levels – every item of data will have a tolerance level - with many being 0. Tolerance levels will be able to be negotiated on an individual institution level and all have to agree by all stakeholders.
- There will be a continuous data checking and cleansing cycle.
- A HESA "course" has a very high level definition which will require some (or significant) academic modelling.
- Continuity of student data becomes a much wider issue. HESA will be looking for continuity of student curriculum data, not just that a student is still enrolled as expected as they have previously done.
- Once HESA has our data, in theory we only need to submit new data & updates to previous data.

Risks

- Capacity to deal with the change whilst also still having to make the usual returns – a home risk
- Timing – government is constantly changing the goal posts, hard to keep up with decision making – sector risk
- Reliant on third party implementation (eg Tribal and changes to SITS system) – sector risk
- We do not know what HESA expects of us is for the 2019/20 return with regard to continuing students –sector risk
- Academic model may need significant reconfiguration but we have no teaching & learning lead– a home risk
- Need for whole School buy-in, particularly Finance and Music & Drama admin (teaching staff also need to understand that flexibility and bespoke-ness will be reduced) – home risk
- Graduate Outcomes reporting is also changing at the same time; burden will need to be shared with Alumni – home risk

Graduate Outcomes (replacing Destination of Leavers in High Education from December 2018)

Scope

Like the DLHE, the Graduate Outcomes survey will collect information in respect of successful leavers of the School after their completion of study. In addition to familiar questions from the DLHE survey, the Graduate Outcomes survey asks new questions to provide a richer picture of the diversity of graduate outcomes. These new 'graduate voice' measures capture three areas:

- How meaningful or important they feel their activity to be
- Whether they are using the skills they gained from their qualification in their current activity
- How they are progressing towards their future goals.

There will be core, opt-in and bespoke questions that the School may ask at the end of the survey.

Administration

HESA's model of open centralisation means that the Graduates Outcomes survey will be administered in a central survey operation overseen by HESA. This operation will be responsible for contacting graduates, quality checking responses, completing additional coding and returning the data to HESA.

HE providers will be required to maintain and supply comprehensive and accurate contact details for their graduates to this contractor. HESA anticipates exceeding a response rate of 70% for the survey to enable publishing of data at course level.

HE providers are expected to have near real-time access to dashboards containing survey data and a significant stake in the survey's governance through the Graduate Outcomes steering group.

Contact methods and survey timing

Graduates will be surveyed by telephone or online approximately 15 months after completing their studies. This is a significant change from the current DLHE survey, which contacts graduates after six months. 15 months has been chosen as it gives graduates a meaningful opportunity to progress in their post-graduation activities, while still being close enough to the point of completing studies that high response rates should be achievable.

Risks

- Until now the six month time-frame after completion means that the School has held fairly up to date graduate contact details. There is concern that the longer time frame will mean a lower response rate if contact details are not current. There will be a greater pressure on the Alumni Department to keep the relationship warm at the early career stage.
- Alumni staff have had difficulties modelling the Razors Edge XLM Graduate Outcomes file so a student record system solution (via SITS) will need to be brought into play at short notice by Registry staff
- Registry staff are already heavily engaged in the HESA Data Futures project

HESES (Higher Education Students Early Statistics Survey)

Compliance requirements

The Higher Education Students Early Statistics Survey, better known as the HESES return, is a student numbers return which is made to HEFCE. The return requires total student numbers and full-time equivalents to be identified within different categories at the 1st December census date each year.

The HESES return is a statutory return that is made by all Higher Education institutions to HEFCE. The return gives an early indication of the number of higher education students studying within a given academic year. Together with data supplied to HESA, the HESES return also informs the School's allocation of teaching funds for the following academic year.

All data used in the return is stored in SITS and then exported from there and transferred into the HESES excel workbooks. The return is heavily reliant on accurate enrolment and assessment data, both current and historic. Historic data is particularly important in the calculation of certain non-completion averages.

Internal decision making

Most fundamental HESES decisions are historic and were made when HESES was first implemented in the School in 2005/6 and are still relevant. Minor decisions are agreed with the relevant stakeholder: finance, departments, registry and are implemented as appropriate – more noteworthy decisions are communicated to the Principal prior to signing the data off.

Quality assurance/audit

An internal audit/spot check relating to two aspects of enrolment (tuition fees and ID cards) was undertaken on the 2015 entry data. There was one recommendation arising concerning periodic

reconciliations between SITS and the access control system. This has been implemented via new automated daily reporting which allows the access control system to update itself. Other aspects of the student record are regularly checked as part of the pre-audit testing relating to the School's accountability return.

The School's HESES returns should be subject to regular (3 yearly) external audits. However, the School has not had its return audited since April 2009. Audit requirements are extensive and comprehensive thus each HESES return is prepared with an impending audit in mind.

The last audit findings were:

“We have concluded that we have gained assurance over the systems and protocols used in deriving the return and over the accuracy of the return in terms of the funding position. In reaching this conclusion, we have made one lesser grade recommendation which, if implemented, should help to improve the accuracy of future returns.”

“Recommendation 1: The key processes involved in the construction of the return, specifically around the extraction of data, forecast of non-completions and the completion of the data tables within the return should be formally documented. The document should be reviewed annually and updated as necessary to ensure compliance with the latest HESES guidance and funding rules, and made available to all relevant staff”

Unistats record (previously Key Information Sets (KIS))

Compliance requirements

Whilst the published Unistats record includes information collected by other means [eg National Student Survey (NSS) and Destination of Leavers from Higher Education (DLHE)] the School provides information to HEFCE specifically for this purpose by way of an annual return detailing contact hours and assessment types concerning all the School's undergraduate degree provision.

The data for each programme is drawn from the programme and module specifications for each programme of study (known internally as the *Gold Copy*) in approval for the year of the return. As the numerical values of the return are based on the average student journey in each year of the programme, the average journey is derived from live student enrolment data on modules in the year of the return using the student record system (SITS), and the most 'popular' modules form the basis of the average student journey.

It is a requirement of the *Memorandum of Assurance* with HEFCE that the Unistats/KIS widget is displayed on each course page, please see bottom of the Acting page for an example:

http://www.gsmd.ac.uk/acting/programmes/ba_honours_in_acting/

Internal decision making

Where a choice is made about the appropriateness of a particular student journey (ie why one module is chosen over another), that decision is recorded and noted in the briefing to the Principal prior to sign-off by the Principal.

Quality assurance /audit

All programmes are subject to revalidation (at least every five years) during which contact hours and assessment types associated with each module are reviewed and reapproved. The Academic Board oversees the revalidation process. During the period of validation, amendments to a programme and its modules, including contact hours and assessment types, must be approved by the Academic Board. A *Gold copy* is produced for each programme for each academic year and is the definitive statement to the student of the hours to be delivered in that academic year.

The Whole School Survey (WSS) at the end of the academic year collects student feedback on the programme and provides an opportunity for students to complain about non-delivery of contact hours (if it hasn't already been raised through other student feedback routes).

The recent internal audit of Principal Study hours in music arose from complaints in the WSS relating to non-delivery.

The Unistats record/KIS has only been running a couple of years and the School has not, as yet, had an external HEFCE audit.

Access Agreement and National Student Scholarship monitoring

Access Agreements have changed to Access & Participation Plans for 2019/20. The Office for Students is currently consulting on significant change to Access & Participation Plans for 2020 onwards.

Compliance requirements

In January each year, the School is required to submit a return in respect of its performance against its milestones and its ~~OFFA~~-accountable access spend in the previous academic year.

The return is compiled from information gathered from a number of sources:

- Registry - Applicant, enrolment and progression data drawn from the student records system (SITS)
- Creative Learning – project spend, project reach and evaluation (in the form of an annual report to Senior Management Team)
- CYM, Junior Guildhall – assisted places spend and student progression information
- Enterprise/Widening Participation Officer – summer school assisted places spend and relevant progression and evaluation information
- Finance – salary and on-costs of roles referenced within the Access Agreement
- Student Finance Officer – data relating to Access Bursary recipients

Internal decision making

The return is currently compiled by the Secretary & Dean of Students.

An overview of the School's performance is considered by the Senior Management Team prior to submission and received for information by the Board of Governors after submission.

The return is signed off by the Principal. The Principal is notified of any significant points in advance of sign-off.

Quality Assurance and Audit

Once submitted, ~~HEFCE and OFPA~~ OfS will consider the submissions and may query aspects of the returns.

The School has not yet been externally audited on its Access monitoring return. ~~The National Student Scholarship Programme has now closed with 2014/15 last year of new recipients.~~

Information to the Student Loans Company

Compliance requirements

The School is required to provide to the Student Loans Company:

- a list of eligible courses for the purposes of government loans – undergraduate and postgraduate ~~and research (new for 2019 entry)~~
- confirmation of the registration and attendance of individual students who have applied for a loan so that payments can be made directly to the School (undergraduate tuition fees only) and to the student (undergraduate maintenance and postgraduate loan)
- notification of student status changes affecting eligibility for a loan (eg intermission and withdrawal).

Internal decision making

The Registry staff determine what is, and is not, an eligible programme under the rules of the scheme. For the School's undergraduate programmes this is not difficult as the School only offers full-time undergraduate degree programmes. For the new postgraduate scheme this has been more difficult as the scheme sets a maximum two-year limit on eligible programmes and mixed modes of attendance are not permitted. Given the flexibility of the Guildhall Artist Masters programme with its different entry and exit points (eg in its most extended form it can be 3 full-time years or 2 full-time and 2 part-time years, but it can also be just 1 full-time year), the Registry made the different routes more explicit to new enrollers (with programme code for the student records system) so that students wishing to apply for the postgraduate loan would be able to choose an eligible route.

Quality Assurance and Audit

Applicants and students are responsible for submitting their own data to Student Finance. Once the enrolment process has been completed, and a student is fully enrolled, confirmation is sent to Student Finance. As noted above there are numerous checks and balances in place for enrolment. The area of difficulty in the student loan process is students thinking they are personally eligible when they are not. There are different rules for the different home nations and this is of most significance in the postgraduate scheme. A Scottish student who has lived and worked in London

for 4 years would be eligible for a postgraduate loan; a Scottish student who has been living in London for the purpose of studying in London for 4 years would not. Checking whether students applying for the postgraduate loan are personally eligible can only be done in retrospect.

Information to the US Government

The School offers US government tuition fee and maintenance loans to undergraduate and taught postgraduate students.

Compliance requirements

The School is required to provide:

- a “Cost of Attendance” for each applicant and programme in the summer prior to start of the programme,
- confirmation of the registration of individual students
- monthly reporting of attendance,
- notification of student status changes affecting eligibility for a loan,
- proof of student entrance and exit counselling.

Internal decision making

The Registry staff determine what is, and is not, an eligible programme and the cost of attendance under the rules of the scheme.

Quality Assurance and Audit

Applicants and students are responsible for applying for the FAFSA with the US Federal Government. Students and applicants complete and return Guildhall’s CoA(Cost of Attendance) and provide the School with their MPN (Master Promissory Note) for each loan and entrance counselling completion and credit check(if applicable). The School verifies the information on their SAR (Student Aid report) to ensure they have not over-borrowed and that there is nothing strange. Once Registry has the required documents and evidence, it will originate the loan. US Loans enrolment reporting occurs on a monthly basis with additional checks immediately following the School’s enrolment in September. (As noted above there are numerous checks and balances in place for enrolment.) There is an ‘end of the academic year closeout’.

The School is required to complete its SAM registration every year circa February (as a federal contractor). This has just been completed for 2017 and the new Principal’s details have been provided. There is an annual compliance audit process due 31 January each year and undertaken by external US government appointed auditors. The Principal will be required to sign the auditor’s letter of engagement. Every three years recertification is required (last done 31 December 2016,) also requiring the Principal’s signature.

Katharine Lewis

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