

Student Records Audit Report 2015/16

Summary

The attached paper provides an overview of the Final Internal Audit Report for Student Records Management 2015/16

One action required.

Recommended Action

Senate is asked to **note** the report.

Publication: Open



**CITY UNIVERSITY
LONDON**

FINAL INTERNAL AUDIT REPORT 2015/16 STUDENT RECORDS MANAGEMENT

Opinion and Recommendation Classification

A **Substantial** level of assurance can be given to the adequacy and effectiveness of the Student Records Management's systems of internal control at the time of our audit and limited to the scope. Substantial assurance is defined as, "While there is a basically sound system, there are weaknesses which put some of the system objectives at risk, and/or there is evidence that the level of non-compliance with some of the controls may put some of the system objectives at risk".

As a result of our audit, the following recommendations have been raised.

Recommendation Type	Number
Priority One	-
Priority Two	1
Priority Three	1

Audit Sponsor: Professor Bolton

INTRODUCTION

- 1.1 Student records management involves the capture, maintenance and secure management of student personal data from the point of application onwards, for the following purposes:
- Managing the University's relationship with students through admissions, enrolment, fee collection, progression, awards and engaging with alumni.
 - Providing management information to support evidence-based planning and policy making
 - Enabling the University to meet statutory reporting and monitoring obligations to Council and to HEFCE, HESA, UKVI and other bodies.
- 1.2 Student and Academic Services work in conjunction with Schools and with Information Services to manage student records and the student database, SITS.
- 1.3 Undergraduate application data is imported directly from UCAS into SITS on a daily basis, automatically generating and updating applicant records in SITS. Postgraduate applications are submitted through the University's online portal and are likewise imported into SITS, along with any supporting documents scanned in by the applicant.
- 1.4 Successful applicants register as current students in two stages, online and in person. The Student Records team within Student and Academic Services coordinates the student registration process including follow up of students who fail to register by the University deadline.
- 1.5 Subsequent changes to student circumstances are recorded by staff within the Schools and checked by Student Records. A self-service facility enables students to check and update their own contact details. An interface between SITS and SAP drives tuition fee invoicing, collection and any adjustments that apply.
- 1.6 A programme is underway to move key student records processes to E:Vision; a group of web modules that manage the delivery of data from the client-server system SITS to a web portal, customised for the University's own business processes and academic rules.¹ E:Vision allows administrators to tailor the data displayed to users and to apply field level controls to ensure data validity. The programme will ultimately reduce the number of users requiring direct access to the SITS client and enhance data quality and consistency.
- 1.7 All Schools retain some physical student records but some Schools, notably the School of Arts and Social Sciences, are transitioning to almost entirely electronic records. The Student Records team no longer retain physical data.
- 1.8 The University has a data retention policy and follows the JISC Higher Education record retention schedule.

AUDIT SCOPE AND APPROACH

- 2.1 The audit approach was to develop an assessment of risks and management controls operating within each area of the scope.
- 2.2 The Audit included the following areas:
- Student registration (enrolment);
 - Amendments to the student records system;
 - Maintenance of academic data;
 - Access to student records;
 - Data security; and
 - Data retention.

¹ <http://www.tribalgroup.com/technology/sitsvision/evision/Pages/default.aspx>

EXECUTIVE SUMMARY

3.1 Areas of Good Practice Identified

- **Data Quality exception reports** – The Student Systems and Data Quality team produce monthly exception and traffic light performance reports for each School to address errors impacting on data quality, student administration, financial management or statutory reporting. The format of the reports has recently been revised to facilitate easier production and to reflect feedback from staff using the reports.
- **Student changes of circumstance (NTWs)** – Schools' staff register these through a process in the E:Vision portal with built-in prompts and field restrictions appropriate to the type of change required. Changes are automatically reflected in SITS and the process generates an automatic notification to the Student Records team who then check the validity of the change and any resulting fee adjustments.
- **SITS access requests** – Requests for new or additional access must be registered through the IS support desk and be approved by the user's line manager and by Student and Academic Services.
- **SITS training** – Staff must complete online and in person SITS training relevant to their role before they are granted access. Training materials highlight the importance of data accuracy and security for statutory returns, HEFCE funding and compliance with data protection legislation.
- **SITS access control** – Authorised users access SITS with a unique ID and password. Passwords must be at least 8 characters in length and complex. Password changes are enforced every 30 days and recently used passwords cannot be recycled. Staff in Information Services monitor SITS access and deactivate accounts that are unused for more than 1 year.
- **SITS audit functionality** – SITS has audit functionality which logs all user actions on student data
- **E-Vision** – Additional processes are being transferred to E:Vision as part of an ongoing programme to reduce the number of users requiring direct access to the SITS client. E:Vision enables system administrators to restrict data display and control data input in ways that are not possible in the live client.
- **Back-up routines** – SITS is included in the University's nightly and weekly back-up routines and reports confirm that back-ups have been successful.
- **Secure storage of physical records** – The audit observed that physical records are held securely in offices or archive rooms with swipe card or key access.
- **Reduction in physical records** – Student and Academic Services do not retain physical student records in the department. Schools, notably Arts and Social Sciences are moving from physical to electronic student records.

3.2 Key Issues Identified

- **Data quality exceptions: Focus** – A significant number of reported exceptions relate to a data field in the records of overseas students which is only relevant for UK students.
- **Data quality exceptions: Resolution** – Analysis of the monthly data quality exception reports found that some exceptions remain unresolved for over two months.
- **Retention of student records** – As reported in 2014/15 there are continuing inconsistencies in retention practices across the University. One School reported retention periods which are shorter than those in the University retention schedule whilst another indicated that some records are retained beyond the specified period. However it was noted that the retention of physical and electronic student records is included in the scope of the Transformation Programme which is currently underway. *In view of this no new recommendation is raised in this report.*

4. Detailed Recommendations

4.1	Timely resolution of exceptions										
Rationale											
<p>Exception reports are an important detective control to enable the timely identification and correction of incomplete or inaccurate student data.</p> <p>Staff in Student & Academic Services circulate monthly reports to Schools identifying student records with incomplete or invalid data. Alongside the exception reports, data quality scorecards are prepared which indicate levels of data quality and exception volumes as a proportion of the population. The audit analysed reports for three categories of exception over a three month period from November 2015 to January 2016 to determine how many were resolved within a month of being reported. The results are listed below:</p>											
<table><tr><th>Report</th><th>Resolved within 1 month</th></tr><tr><td>R1 Missing entry profile data (<i>includes country of domicile, term time address, ethnicity, disability, highest qualification and parental education</i>).</td><td>8%</td></tr><tr><td>R5 Outstanding registration</td><td>86%</td></tr><tr><td>R6 Status code/ load/ MOA discrepancies (<i>e.g. a student recorded as both writing up <u>and</u> attending full-time</i>)</td><td>54%</td></tr></table>				Report	Resolved within 1 month	R1 Missing entry profile data (<i>includes country of domicile, term time address, ethnicity, disability, highest qualification and parental education</i>).	8%	R5 Outstanding registration	86%	R6 Status code/ load/ MOA discrepancies (<i>e.g. a student recorded as both writing up <u>and</u> attending full-time</i>)	54%
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<p>It was noted that additional analysis has been added to the reports from March 2016 to show the number of exceptions carried over from the previous month.</p> <p>There is a risk that exceptions which are not resolved in a timely way negatively impact on the production of statutory returns, management information and services provided to students.</p>											
Recommendation		Priority									
School staff should be reminded of the requirement to resolve data errors promptly and new reporting on the number of exceptions carried over should be used to highlight areas of difficulty where additional support or training may be required.		Two									
Management Response											
The addition of the analysis to the exception reports are still in their infancy. Academic Operations will communicate with the Data Quality/Student Systems group as well as the COOs to explain the process and agree a way of highlighting areas where additional support or training may be required.											
Target Date	October 2016	Responsibility	Emma Boylan, Assistant Director (Academic Operations)								

4.2	Prioritising critical exceptions		
Rationale			
<p>Exception reports should focus attention on those exceptions that are most likely to impact on legal compliance, statutory reporting, service delivery or financial management.</p> <p>Of the exception reports reviewed during the audit, the report R1-incomplete entry profile data accounted for the highest volume of exceptions with 501 individual exceptions report between November 2015 and January 2016. Of these 92% took longer than a month to resolve. Further investigation however showed that many of these exceptions relate to an incomplete field in SITS relating to parental education. This data is required in the HESA Student Return for all UK domiciled students but over 90% of the exceptions reported were for non-UK students.</p> <p>There is a risk that reporting of non-critical exceptions creates a distorted view of data quality and diverts management time from the most significant exceptions.</p>			
Recommendation		Priority	
Student and Academic Services should review the exception report R1 to ensure that it only includes critical exceptions. In addition management should investigate alternative ways to populate this field.		Three	
Management Response			
This will be actioned by Academic Operations.			
Target Date	October 2016	Responsibility	Emma Boylan, Assistant Director (Academic Operations)

Appendix 1 – Assurance Definitions and Priority Levels

In order to assist management in using our reports:

a) We categorise our **opinions** according to our assessment of the controls in place and the level of compliance with these controls.

Full Assurance	There is a sound system of control designed to achieve the system objectives and the controls are being consistently applied.
Substantial Assurance	While there is a basically sound system, there are weaknesses which put some of the system objectives at risk, and/or there is evidence that the level of non-compliance with some of the controls may put some of the system objectives at risk.
Limited Assurance	Weaknesses in the system of controls are such as to put the system objectives at risk, and/or the level of non-compliance puts the system objectives at risk.
No Assurance	Control is generally weak, leaving the system open to significant error or abuse, and/or significant non-compliance with basic controls leaves the system open to error or abuse.

b) We categorise our **recommendations** according to their level of priority.

Priority 1	Critical business risk not being adequately addressed; weaknesses in key business control; substantial non-conformance with regulations and accepted standards.
Priority 2	Important business issues to be addressed; improvement area; inadequate risk identification or reduction; non-conformance with regulations.
Priority 3	Minor non-conformances with the business management system; other business issues to be addressed, good working practices.