

Cylchlythyr | Circular

Guidance for Internal Auditors to use in their Annual Internal Audit of HE Data Systems and Processes

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To: Heads of regulated and/or directly-funded higher education institutions in Wales
Principals of regulated and/or directly-funded further education institutions in Wales
Internal auditors of regulated and/or directly funded higher education institutions and further education institutions in Wales
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This circular provides guidance for internal auditors to use in their annual internal audit of HE data systems and processes.

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Introduction

1. This circular provides guidance to the internal auditors of regulated and/or directly funded higher education institutions (HEIs) and further education institutions (FEIs) referred to throughout as higher education providers (HEPs) to use for their annual internal audit of the internal controls relating to the systems and processes in place to produce higher education (HE) data returns, and requests a copy of this internal audit report for each HEP.
2. Details of the process of the external audit of higher education data can be found in circular W18/33HE. External audits are commissioned by HEFCW so that HEPs are externally audited at least once every four years. As part of the process, HEFCW will rely on the annual assurance provided to HEPs and their Audit Committees by their internal auditors about the systems and processes used to produce data returns. Relying on the internal audits will maintain an adequate level of annual assurance in respect of HEP's data returns.
3. The internal audit will provide an opinion as to the adequacy and effectiveness of the controls in place to manage the risks relating to the accuracy of data submitted by the HEP to the Higher Education Statistics Agency (HESA), HEFCW and Welsh Government (WG), including data to be used in calculations for the following funding streams:
 - Teaching funding (currently comprising per capita and premium funding and part-time (PT) undergraduate (UG) credit-based funding);
 - Postgraduate research (PGR) training funding;
 - Quality research (QR) funding;
4. The internal audit should also provide assurance over the controls in place to ensure the accuracy of data used in the monitoring of performance, including key performance indicators such as the Corporate Strategy targets 2013/14-2017/18 (to be replaced by the National Measures) and data included by HEPs in their fee and access plans and fee and access plan monitoring.
5. Additionally, auditors should provide opinions on the preparations being made for and controls in place to manage the risks relating to the implementation of the new student data collection for the HESA Data Futures programme.
6. This document provides guidance to the internal auditors about the nature of the controls that their audit should address to assess whether the systems and processes are adequate to provide accurate data returns and data to use in monitoring and also to ensure that internal audits taking place across the sector are carried out on a consistent basis.
7. If the internal audit report's overall conclusion, or the conclusions relating to the adequacy of the design of the methods of control and the application

of those controls, provides a negative opinion (e.g. limited or no assurance, unsatisfactory or inadequate controls) and/or the report includes a significant number of recommendations, HEFCW should be notified as soon as the opinion has been agreed. HEFCW will then consider commissioning their own external audit. This external audit will consider the accuracy of data for the current period and also consider the findings of the internal auditor and aim to assess the extent of potential errors in the data returns and data used for monitoring for prior periods up to the last external audit. The findings of the external audit may result in adjustments to funding and further action may be taken if HEPs are found to be not compliant with their fee and access plans, the supply-side code of practice for data collections or the financial management code.

Funding and Monitoring Methodology

8. Outlines of the current methodology used to calculate the formula driven elements of credit-based funding for teaching, PGR training funding and QR funding are given in Annex A. Annex B contains the criteria for inclusion of data in the allocations of per capita, premium and PGR training funding. The criteria for inclusion of data in the Corporate Strategy targets 2013/14-2017/18 are outlined in Annex C. The criteria for inclusion in the National Measures that are replacing the Corporate Strategy targets are still be being developed and will be published in due course. We are not expecting these to be included in the scope of the audit. Methodologies are described in more detail in HEFCW circular series 'Higher Education Data Requirements' ([W17/26HE](#) and [W18/20HE](#)). Annex D contains a summary of the recommendations of the most recent internal and external audits.

Scope of the Audit

9. The way in which internal audit work and controls testing is carried out at each HEP will depend on the systems and controls in place and how information is shared within the HEP. However, it is expected that the internal audit work will cover the elements highlighted in this document. Where previous internal audit work has found that the systems and controls in place are satisfactory, it may be considered appropriate by the HEP's Audit Committee for subsequent audits to only cover areas of risk (see also paragraph 44).
10. Auditors should ascertain the processes by which data returns and monitoring information are compiled and document them to the extent necessary to enable an evaluation to be made of the adequacy of the existing controls used by the HEP to ensure that they produce accurate data returns and appropriately compile monitoring data. Examples of the controls that the audit would normally be expected to assess are set out for all the current funding streams, data returns and other areas of audit in paragraphs 19 to 40. Many of the controls are common to the data returns

for all areas of audit. However, not all of the areas of audit apply to all HEPs, and auditors should refer to the relevant paragraphs.

11. Auditors should note that there are some areas where HEPs may have to return estimates, where information is not known at the time of return or information is not available in the required form. Estimates can be made using methods suggested by HEFCW in its guidance, or if appropriate, HEPs can use their own methods. Where estimates have been made, auditors should review the methods used to calculate them, confirm that they are properly documented, reasonable, consistently applied and tested for reliability.
12. If a HEP is in the process of merging or has recently merged with one or more other HEPs, the auditor should ascertain if procedures have been put in place to integrate their data systems or otherwise ensure that returns for the whole merged HEP can be made.
13. In planning the audit, the Auditor should consider the findings and conclusions of the latest external and/or internal audit reports relating to systems and data returns for the HEP and any follow up reports and correspondence with management to assess the extent of implementation of the reports' recommendations. It is expected that the audit reports will make reference to and comment upon the extent that recommendations made by auditors in the previous internal or external audit reports have been effectively implemented.
14. It is recommended that internal audit staff with some experience of the HE sector and associated data returns are involved in the visits to HEPs undertaken as part of the review and that auditors are sufficiently briefed on the guidance contained within this circular prior to carrying out the audit. Advice and clarification relating to the guidance in this circular can be obtained from HEFCW via hestats@hefcw.ac.uk, and HEFCW staff are available to meet with internal audit staff if required.
15. All HEFCW circulars described below are available under 'publications' on the HEFCW website, www.hefcw.ac.uk or can be obtained from HEFCW directly via hestats@hefcw.ac.uk.

Teaching funding

16. The teaching funding method changed in 2012/13 with the introduction of the new fees regime for full-time undergraduate and postgraduate certificate in education (PGCE) provision. HEFCW circular [W18/10HE](#) 'HEFCW's Funding Allocations 2018/19' describes the methodology used in 2018/19. 2018/19 teaching funding comprises:
 - Funding allocated through the credit based teaching funding method for part-time undergraduate taught provision;
 - Per capita funding for full-time and part-time taught provision;

- Expensive subject premium funding for full-time undergraduate provision;
 - Access and retention premium funding for part-time undergraduate provision;
 - Disability premium for part-time undergraduate and full-time and part-time postgraduate research provision;
 - Welsh medium premium for part-time undergraduate provision.
17. Funding allocated for part-time undergraduate provision through the credit based teaching funding method for 2018/19 is based on 2016/17 End of Year Monitoring (**EYM**) credit value data as extracted from the HESA student record via the HESA Information Reporting Interface Service (IRIS) for all HEPs HEFCW circular [W17/29HE](#) describes the extraction method in full.
18. Adjustments to 2017/18 funding for HE providers are calculated using EYM data extracted from HESA IRIS, the 2017/18 data extraction is fully described in HEFCW circular [W18/16HE](#). Data from the Higher Education Students Early Statistics (**HESES**) survey (HEFCW circular [W18/28HE](#)) are no longer used in funding calculations, however, the survey is still in the scope of the audit.
19. Testing of the systems and processes used to generate figures returned on the **HESES** survey and **EYM** data returned on the HESA student record and extracted via HESA IRIS should aim to answer the following questions:
- Is the latest HEFCW guidance being utilised and adhered to, in particular, have changes from the previous HESES surveys been noted and appropriately implemented?
 - Are data on the records system validated (e.g. a comparison of a sample of enrolment forms with data on the system)?
 - Is the method of extraction of data used to make a return to the HESES survey documented?
 - Is there an adequate audit trail to confirm that the method of data extraction for the surveys is being applied as documented?
 - Are details of any manual amendments to data extracted from the system for the HESES survey, or to EYM data extracted via HESA IRIS, documented, with justification and/or appropriate authorisation of the changes?
 - Is a copy kept of the data taken from the system to make the return to the HESES survey?
 - Is the final return to the HESES survey checked against data on the system prior to submission and is there adequate evidence of this checking process?
 - Is the EYM data extraction provided through the HESA IRIS system checked against data on the HEP's internal system and is there evidence of this checking process prior to the data verifications being signed off?

- Is the verification approved and signed off by an appropriate person?
- Are the staff resources available, taking into consideration experience and expertise, adequate to ensure that the HESES survey returns are accurately prepared and the EYM extraction from the HESA IRIS system is thoroughly checked?
- Is the documentation of the system and staff resource sufficient to ensure that accurate data returns could be prepared even in the absence of some key staff?
- Is there a risk register in place and are the risks relating to the compilation of accurate data returns, and related controls to manage these risks, adequately assessed and documented together with details of planned action to be taken, where relevant, to strengthen the existing controls?
- Are HESES survey returns scrutinised before submission by suitably experienced members of staff other than those compiling the return?
- Are EYM data extracted as part of the HESA IRIS system scrutinised before verification by suitably experienced members of staff other than those that compiled the HESA return?
- Is a summary report of the data returned presented to the HEP's senior management team (e.g. the total numbers of credits and students by mode and level with comparisons to prior years and/or other returns)?
- Is there a suitable process in place to ensure that staff who provide information (e.g. in departments) and staff compiling the return liaise as necessary to ensure that the most up to date information available relating to the survey period is included in the return?
- Is there evidence that validation and credibility checks are completed before returning or signing off data (e.g. scrutinising the credibility checks provided by HEFCW on the Excel spreadsheets; comparing EYM/HESES data against HESES returns made earlier in the academic year or in the previous academic year; use of control totals)?
- Are there procedures for determining the fundability status of students and are checks made on fundability status (e.g. for students located outside Wales); and have the fundability rules contained in HESES been accounted for in the determination?
- Is the method for assigning JACS subject codes to modules and hence categorising credits into Academic Subject Categories (ASCs) documented and reasonable?
- Is there an adequate audit trail to confirm that the method for categorising credits into ASCs is being applied as documented?
- Are processes used by HEPs to calculate estimates (e.g. non-completion rates) reasonable and documented, and is their reliability tested?
- Do processes ensure that evidence of enrolment and attendance available is complete and retained as part of the audit trail (e.g. enrolment forms, online enrolment records, module choice forms)?

- Are franchised out students correctly identified as such on the system, and recorded as such on the returns, and not, for example, as distance learning students (where distance learning students are those that are students of the reporting HEP, where staff employed by the reporting HEP are responsible for providing all teaching or supervision, but who are located away from the reporting HEP and are not part of a franchising arrangement with another HEP or organisation)?
 - Are arrangements with franchise partners documented and are there controls in place to ensure that only the franchisor returns the provision?
 - For FEIs, is course title information extracted as part of the HESA IRIS system in the EYM raw data tables checked against the agreed portfolio of courses as approved by HEFCW?
 - If the HEP has recently been formed from a merger are the data systems in place sufficiently integrated to enable the HEP to make returns for the whole HEP and manage the process of validating and verifying data?
20. For 2018/19 funding, per capita and premium funding is based on data taken from the HESA student record (coding manuals and guidance are available on the HESA website – www.hesa.ac.uk).
21. The fields and criteria used to extract data from the records for 2018/19 funding are detailed in the Higher Education Data Requirements circular [W17/26HE](#) (latest version - HEFCW circular [W18/20HE](#)). Testing of the systems and processes used to make these returns should aim to answer the following questions:

HESA student record:

- Do the controls include quality checks on individualised data prior to submission to HESA, in particular for data fields used in funding (e.g. checks that home postcodes have been correctly transcribed; fundability status is correct; year of student is correct; those in receipt of disabled students' allowance (DSA) are recorded as such)?
- Where errors were identified in prior returns, by HEFCW, HESA or the HEP, through audit or otherwise, particularly those which led to reductions in funding, have processes been implemented to address these data errors?
- Where errors have been identified in prior returns, are the relevant data checked prior to final submission of data to HESA to confirm that the error has not reoccurred?
- Is there evidence that the web reports and IRIS output, produced by the HESA data returns system after committing data, are scrutinised, and that any resulting issues are addressed?
- Is a copy kept of the final data submitted to HESA?

- Is the method used to calculate the proportion of a module taught through the medium of Welsh documented, reasonable and consistently applied?
- Are any manual amendments made by HEFCW to exclude Welsh medium modules checked to confirm they have been correctly excluded?
- Are the staff resources available, taking into consideration experience and expertise, adequate to ensure that the data returns are accurately prepared?
- Is the documentation of the system and processes and the staff resource sufficient to ensure that accurate data returns could be prepared even in the absence of some key staff?
- Is there a risk register in place and are the risks relating to the compilation of accurate data returns, and related controls to manage these risks, adequately assessed and documented together with details of planned action to be taken, where relevant, to strengthen the existing controls?
- Are returns scrutinised before submission by suitably experienced members of staff other than those compiling the return?
- Is a summary report of the data submitted to HESA presented to the HEP's senior management team (e.g. numbers of students by mode and level and/or course and subject with comparisons to prior years and/or other returns)?
- Are the HEFCW confirmation and verification reports checked against data submitted to HESA to ensure that the HEFCW reports are accurate according to HEFCW criteria?
- Where, in addition to their directly funded provision, the FEI franchises provision in, are there controls in place to ensure that only the franchisor returns the provision to HESA?
- If the HEP has recently been formed from a merger are the data systems in place sufficiently integrated to enable the HEP to make a HESA student record return for the whole HEP?

PGR and QR Funding

22. PGR training funding for 2018/19 was allocated using data about eligible, fundable enrolments in Units of Assessment (UoAs) which qualified for QR funding taken from the 2016/17 HESA student record.
23. The fields and criteria used to extract the data from the record for 2018/19 funding are detailed in the Higher Education Data Requirements circular [W17/26HE](#) (latest version - HEFCW circular [W18/20HE](#)). Testing of the systems and processes used to record data relating to PGR students on the HESA return should aim to answer the following questions (in addition to those listed in paragraph 21 for the HESA student record):

HESA student record:

- Are quality checks carried out on individualised data for data fields used in calculating PGR funding (e.g. fundability status is correct; UoA is correct)?
 - Are the HEFCW confirmation reports checked against data submitted to HESA to ensure the HEFCW reports are accurate according to HEFCW criteria?
 - Where errors were identified in prior returns, by HEFCW, HESA or the HEP, through audit or otherwise, particularly those which led to reductions in PGR funding, have processes been implemented to address these data errors?
 - Where errors have previously been identified in PGR data, are the PGR data checked prior to final submission of data to HESA to confirm that the error has not reoccurred?
24. QR funding is allocated only to those HEIs with UoAs submitted to the 2014 Research Excellence Framework (REF) where the UoA has 3 or more classified FTE Category A staff and meets a combined volume and quality threshold (multiple submissions to UoA 28 and joint submissions are exempt from the volume and sustainability thresholds).
25. The 2018/19 QR funding method replicates the method used from 2015/16 -2017/18. Funding was allocated using data from the 2014 REF and data taken from the 2013/14 HESA staff and student records. 2014 REF data is not included in the scope of the audit. Therefore the audit will only include checks on the systems and processes used to return data relating to HESA staff and student data used in the minor volume measures of the QR funding method, details of which can be found in document 'HESA data to be used in 2015/16 QR funding' on our website: [Funding Calculations](#). For 2017/18 and 2018/19 funding the model and data used to calculate the allocation are the same as those which were used in 2015/16 so this document has not been updated. The checks should aim to answer the following questions:
- Are quality checks carried out on individualised data for data fields used in extracting minor volume measures (research assistants and research students)?
 - Are the HEFCW confirmation reports checked against data submitted to HESA to ensure the HEFCW reports are accurate according to HEFCW criteria?
 - Where errors were identified in prior returns, by HEFCW, HESA or the HEP, through audit or otherwise, have processes been implemented to address these data errors?
 - Where errors have previously been identified in minor volume measure data, are the data checked prior to final submission of data to HESA to confirm that the error has not reoccurred?

Corporate Strategy targets

26. The systems and processes used to return data used in the monitoring of the Corporate Strategy targets for 2013/14 to 2017/18, for HEIs, are within the scope of the audit for the following set of indicators:

- Widening Access;
- Participation;
- Retention;
- Part-time;
- Welsh medium;
- Overseas students;
- Initial Teacher Training;
- Employment;
- Employability;
- Continuing Professional Development;
- Collaborative Research Income;
- Research Council income.

27. A subset of the targets are included in the scope of the audit for FEIs:

- Widening Access;
- Participation;
- Part-time;
- Welsh medium;

28. More information about the Corporate Strategy and the targets is in 'HEFCW Corporate Strategy 2013/14 – 2016/17', which can be found on our website: HEFCW [Corporate Strategy](#). It should be noted that the targets were originally to 2016/17 and were extended to 2017/18.

29. The fields and criteria used to extract the data used in monitoring these targets are detailed in the 2018/19 Higher Education Data Requirements circular (HEFCW circular [W18/20HE](#)). HESA UK performance indicator data, which are derived from HESA Destinations of Leavers from Higher Education (DLHE) survey data, are used in the calculation of the Employment target. More information about the indicators E1 can be found [here](#). Testing of systems and processes used to return data that are used in funding (see paragraph 21 for the HESA record) will cover most of the testing appropriate for HESA data used in monitoring the targets. In addition, testing should aim to answer the following questions:

HESA student record:

- Do the controls include quality checks on individualised data prior to submission to HESA, in particular for data fields used in monitoring (e.g. checks that the student's domicile is correct; that the mode and level of study are correct)?
- Is there evidence that for the corporate strategy target data extracts contained in the IRIS output produced by the HESA data returns

system after committing data, is scrutinised, and that any resulting issues are addressed?

- Where errors have previously been identified in data used for monitoring, by HEFCW or the HEP, have processes been implemented to address these data errors?
- Where errors have previously been identified in data used for monitoring, are the data checked prior to final submission of data to HESA to confirm that the error has not reoccurred?
- Do the controls include quality checks on individualised data relating to ITT enrolments submitted to HESA (e.g. checks that the teacher training identifier has been correctly coded; that the student's initial teacher training phase, mode of study, level of study, subject of study and commencement date are correct)?

HESA DLHE survey:

- Are HESA survey definitions and guidelines utilised and adhered to?
- Are validation and credibility checks carried out before returning data (e.g. comparisons with previous year's data)?
- Are the staff resources available, taking into consideration experience and expertise, adequate to ensure that the data returns are accurately prepared?
- Is the documentation of the systems and processes and the staff resource sufficient to ensure that data returns could be prepared even in the absence of some key staff?
- Is there a risk register in place and are the risks relating to the compilation of data returns, and related controls to manage these risks, adequately assessed and documented together with details of planned action to be taken, where relevant, to strengthen the existing controls?
- Are returns scrutinised before submission by suitably experienced members of staff other than those compiling the return?
- Is a summary report of the data returned presented to the HEP's senior management team (e.g. the items of data used in corporate strategy targets with comparisons to prior years and/or other returns)?
- Are employment performance indicators derived from DLHE data scrutinised during the preview of the performance indicators?
- Where errors have previously been identified in data used for monitoring, by HEFCW or the HEP, have processes been implemented to address these data errors?
- Where errors have previously been identified in data used for monitoring, are the data checked prior to final submission of data to HESA to confirm that the error has not reoccurred?

HESA Higher Education Business and Community Interaction (HEBCI) survey:

- Are HEBCI survey definitions and guidelines utilised and adhered to?

- Are validation and credibility checks carried out before returning data (e.g. comparisons with previous year's data)?
- Are the methods and processes used to collate and extract data documented?
- Is there an adequate audit trail to confirm that data extraction methods are being applied as documented?
- Is a copy kept of the final data submitted?
- Are the staff resources available, taking into consideration experience and expertise, adequate to ensure that the data returns are accurately prepared?
- Is the documentation of the systems and processes and the staff resource sufficient to ensure that data returns could be prepared even in the absence of some key staff?
- Is there a risk register in place and are the risks relating to the compilation of data returns, and related controls to manage these risks, adequately assessed and documented together with details of planned action to be taken, where relevant, to strengthen the existing controls?
- Are returns scrutinised before submission by suitably experienced members of staff other than those compiling the return?
- Is a summary report of the data returned presented to the HEP's senior management team (e.g. the items of data used in corporate strategy targets with comparisons to prior years and/or other returns)?
- Is there a suitable process in place to ensure that staff who provide information (e.g. in departments) and staff compiling the return liaise as necessary to ensure that the most up to date information available relating to the survey period is included in the return?
- Are processes used to calculate estimates reasonable and documented, and is their reliability tested?
- If the HEP has recently been formed from a merger are the systems in place sufficiently integrated to enable the HEP to make a HEBCI survey return for the whole HEP?
- Do the controls include a reconciliation of the Collaborative Research income returned with the audited accounts to ensure consistency?

HESA finance record:

- Are definitions and guidelines utilised and adhered to?
- Are validation and credibility checks carried out before returning data (e.g. comparisons with previous year's data)?
- Are the methods and processes used to collate and extract data documented?
- Is there an adequate audit trail to confirm that data extraction methods are being applied as documented?
- Is a copy kept of the final data submitted?
- Are the staff resources available, taking into consideration experience and expertise, adequate to ensure that the data returns are accurately prepared?

- Is the documentation of the systems and processes and the staff resource sufficient to ensure that data returns could be prepared even in the absence of some key staff?
- Is there a risk register in place and are the risks relating to the compilation of data returns, and related controls to manage these risks, adequately assessed and documented together with details of planned action to be taken, where relevant, to strengthen the existing controls?
- Are returns scrutinised before submission by suitably experienced members of staff other than those compiling the return?
- Is a summary report of the data returned presented to the HEP's senior management team (e.g. the items of data used in corporate strategy targets with comparisons to prior years and/or other returns)?
- Is there a suitable process in place to ensure that staff who provide information (e.g. in departments) and staff compiling the return liaise as necessary to ensure that the most up to date information available relating to the survey period is included in the return?
- Do controls include a reconciliation of the Research Council income returned with the audited accounts to ensure consistency?

Data returned on fee and access plans and fee and access plan monitoring returns

30. The process for submitting the fee and access plans (FAPs) to HEFCW changed for the 2017/18 submission ('FAPS' are used to refer to both pre-2017/18 fee plans and fee and access plans for 2017/18 onwards). HEPs are no longer required to include estimates of their contribution to the HEFCW corporate strategy targets, instead HEPs set their own targets which may or may not be based on the HEFCW corporate strategy targets. Paragraphs 124 to 134 in the 2019/20 Fee and access plan guidance (circular [W18/03HE](#)) outline how a HEP should set their targets. Both HEIs and FEIs with approved FAPs are included.
31. Also returned on the FAPs are the fee levels set for the academic year, estimates of average fee levels, additional income expected and, where required, numbers of students with fee levels. The systems and processes used to produce them are included in the scope of the audit. More information can be found in HEFCW circular [W18/03HE](#) Fee and access plan guidance 2019/20.
32. Also in the scope of the audit are the systems and processes used to produce the data returned on the FAP monitoring submission. In the submission, HEPs are required to report on outcomes against their FAP targets and actual fee income for the academic year that the FAP relates to. At the time of audit, the latest monitoring submission will be for either 2016/17 or 2017/18. For 2016/17, HEPs will have included both data relating to the Corporate Strategy targets and any individual targets. From

2017/18 onwards targets are set by the HEP though can be based on the Corporate Strategy targets if a HEP chooses.

33. Testing of the systems and processes used for setting, monitoring or amending forecast targets, setting the fee levels, calculating the average fee, calculating and monitoring the fee income and estimating the number of students at each fee level should aim to answer the following questions:

- Have targets returned on the FAP been derived from auditable sources of data?
- Have the methods for setting targets been appropriately agreed and documented and a clear audit trail been maintained to support subsequent monitoring?
- Has the method of calculating the average fee per full-time undergraduate student been documented and is it reasonable?
- Has the method of calculating expected total fee income been documented and is it reasonable?
- Has the method of estimating the numbers of students at each fee level been documented and is it reasonable?
- Is there a process in place to monitor targets set in the FAP?
- Are any methods used to calculate figures used in monitoring targets reasonable?
- Do the monitoring figures reported on the FAP monitoring statement reflect the performance against target for the appropriate year?
- Is there a process in place to monitor any amendments to forecasts of the targets?
- Has the monitoring process, including the methods and processes used for obtaining, calculating or amending forecast figures used in the targets been documented and is it accessible by all staff who need to use it?
- Are figures supplied on the monitoring submission crossed checked against those supplied in the FAP?
- Is there a process in place to ensure the reported level of achievement stated for each target in the monitoring statement is accurate?
- Has the method of calculating fee income figures returned on the FAP monitoring submission been documented and is it reasonable?
- Do the fee income figures included on the FAP monitoring submission reconcile with the audited accounts? Has the FAP been presented to and approved by the governing body?
- Do fees charged and fee levels stated on the FAP match and are there processes in place to ensure that fees charged do not exceed fee levels stated on the FAP?
- Is there a risk register in place and are the risks associated with not meeting the targets adequately assessed and documented together with details of planned action to be taken?

Other HESA data

34. Other HESA data not covered in the previous paragraphs that are also under the scope of the audit include data returned on the HESA finance record, aggregate offshore record, Estates Management record and HEBCI survey, other than that identified in paragraph 27, and data returned on the HESA Unistats record (the HESA Key Information Set (KIS) up to 2016/17).
35. Testing of systems and processes used to return data that are used in corporate strategy targets (see paragraph 26) will cover most of the testing appropriate for HESA HEBCI survey data and HESA finance record data.
36. . The Unistats dataset contains information about courses. Included in the scope of an audit of Unistats data are course related data and accommodation cost data. Testing should aim to answer the following questions:
 - Have eligible courses been returned on the Unistats dataset and are the data for those courses accurate?
 - Where data has been estimated, have estimates been made on a reasonable basis and documented?

HESA Data Futures Programme

37. Data Futures is HESA's transformation programme that will deliver the vision for a modernised and more efficient approach to collecting data, to deliver better output for a wider range of data users. HESA are currently working with stakeholders across the sector to build, pilot, and implement a new live system starting in the 2019/20 academic year.
38. Auditors should familiarise themselves with background to the [programme](#), and in particular how the HEP is preparing for the schedule of change. HESA have produced a Data Futures preparation assessment tool (available via HESA's [website](#)) for use by the HEP which aims to:
 - Reflect on, and evaluate preparedness across a range of information management categories;
 - Prioritise areas for further action;
 - Guide discussions with software providers;
 - Communicate levels of comfort and concern to senior managers.
39. The tool covers several dimensions of each stage of a standard information management lifecycle and is split into several sections which aims to answer, for the HEP's use, the following questions:

Collect:

- Do you understand what data you are expected to provide?
- Have you identified where or if the data required is captured?

- Have you identified how you will source data you currently don't collect?

Assure:

- Do you understand the data quality requirements needed to meet the new specification?
- Do you have a plan to assure the quality of the data is fit for purpose?
- Is it feasible to implement the plan in every place where something needs to change?

Store and Manage:

- Have you identified the systems, and locations within those systems, where the individual fields will be stored, and updates to those fields can be made?
- How will the organisation manage changes to required data over time?

HESA interactions:

- What is your confidence you can format your data ready to submit to HESA in 2019/20?
- Do you believe you have sufficiently skilled people to manage in-cycle submissions?
- Do you know how you are going to deal with specification changes?
- Do you have a plan of how you will manage data quality queries through the HESA submission process?

Implementation:

- Have you understood the implications of in-cycle requirements?
- Have you created a plan to be ready for mandatory submission?
- Have you identified the type and number of resources for your plan?
- Is your plan fully resourced - both internally and externally including software suppliers (if applicable)?
- Are your senior management engaged, supportive and committed of the goals, needs and priority of the project?

40. Auditors should review the HEP's use of this preparation assessment tool to determine how prepared the HEP is for the implementation of Data Futures and confirm that the HEP has considered the risks associated with the implementation. In particular, testing should aim to answer the following questions:

- Is the HEP as prepared as it can be for the implementation of Data Futures in 2019/20 and is there a plan for implementation?
- Does the HEP have sufficient resource, in terms of both finance and suitably skilled staff, to implement Data Futures successfully?
- Are senior management engaged and supportive of the programme and aware of the progress towards implementation and any difficulties being encountered?

Interpretation and Guidance

41. Auditors should familiarise themselves with the latest, at the time of audit, HESES, EYM, HESA guidance (including for the HEBCI survey and finance record), data requirements circular and the fee and access plan process and guidance. Some of the publications may be updated after publication of this circular and auditors should pay particular attention to any changes made to the data collected that imply changes to the way in which systems and processes work and assess whether HEPs have made or intend to make appropriate adjustments.
42. Any further clarification relating to the guidance for making HESES, EYM, HESA returns or extracting EYM data from the HESA student record via the IRIS system or relating to fee and access plan guidance can be obtained from HEFCW.

Open University in Wales

43. HEFCW has responsibility for funding relating to teaching at the Open University (OU) in Wales. Teaching funding allocated to the OU in Wales is calculated using the same funding methodology as other HEIs. As in previous years the systems and processes used to compile data returns to HESA and HEFCW that are used in the calculation of teaching funding are included in the scope of the internal audit. In addition, the OU in Wales is included in the monitoring of Corporate Strategy targets and so the systems and processes used for monitoring these indicators and targets are included in the scope of the audit. The OU in Wales does not currently receive PGR or QR funding from HEFCW and did not submit a fee and access plan relating to full-time undergraduate and PGCE fees in 2019/20.

Reporting

44. The annual internal audit plan should include a review of the controls in place to manage the risks relating to the submission of accurate data returns and data returned in and used to monitor the FAPs. This review should include an assessment of the adequacy of the controls documented in paragraphs 21 to 40 above as relevant. However, the precise scope of the internal audit work completed will be determined by each HEP's assessment of the risks relating to their HEP's data return and it is expected that the internal audit work will focus on the higher risk aspects of the systems and processes, for example, issues identified in previous audits, or aspects not covered in previous audits.
45. The timing of the internal audit work should be arranged so that the internal audit report can be completed and presented to the HEP's Audit Committee before a copy of the report is sent by the HEP to HEFCW by 3 June 2019.

46. Where the Audit Committee's internal audit plan includes only very limited work in relation to data systems and processes, because there is perceived to be low risk in this area, an institutional representative should contact HEFCW to inform us why this area is considered low risk and how annual assurance can be obtained in these circumstances. The representative should contact HEFCW at the point that their Audit Committee finalises their audit plan if this is the case. Similarly, if there are any changes to the cyclical nature of the plan or timing of committees that mean that an audit report will not be available by the deadline of 3 June 2019, a representative should contact HEFCW to discuss.
47. The internal audit report should include:
- A description of the objectives of the audit and the risks and controls included within the scope of the audit;
 - Details of the audit work completed;
 - Details of issues identified during the audit and the recommendations made to address these;
 - A consideration of the recommendations made in previous audit reports and the extent to which these have been effectively implemented;
 - Management's responses to the report's recommendations and the agreed timescales for their implementation;
 - Details of any disagreements or recommendations which were not accepted by management;
 - A clear conclusion and overall opinion as to the adequacy and effectiveness of the controls in place to manage the risks relating to the accuracy of the data returns included within the scope of the audit.
48. If the internal audit report's overall conclusion, or the conclusions relating to the adequacy of the design of the system of control and the application of those controls, provides a negative opinion (e.g. limited or no assurance, unsatisfactory or inadequate controls) details of the significant exceptions giving rise to this opinion should be provided in the report. In these circumstances the HEP's Audit Committee and HEFCW should be informed of the relevant issues as soon as possible.
49. The HEP's Audit Committee should include reference in its annual report to the reports and assurances that it has received during the year in respect of the controls in place to manage the quality of data returns made by the HEP for funding or monitoring purposes and the controls relating to data returned in and used to monitor the fee plans.
50. An electronic copy of the audit report and any associated correspondence should be sent **by the HEP** to **hestats@hefcw.ac.uk** no later than **3 June 2019**. Note that we do not require a paper copy to be sent to us.

51. Details of the internal audit work and reports completed since the last external audit of higher education data should be retained and be made available to the external auditors during their visits. The HEFCW Audit Service may also wish to review these reports and related papers during their periodic visits to the HEP.

Further Information

52. Further guidance and information is available from Rachael Clifford (029 2085 9721, hestats@hefcw.ac.uk) or Hannah Falvey (029 2085 9720, hestats@hefcw.ac.uk).

HEFCW Recurrent Funding

The methodology for extracting the data described below is available in more detail in the data requirements circulars (see paragraph 8 of the main part of this circular).

Funding for Teaching 2018/19

- 1 The method of funding for teaching changed in 2012/13 with the introduction of the new fee regime for full-time (FT) UG and PGCE students. For PT UG provision, funded credit-based funding continues to be allocated. Also allocated for PT UG provision are per capita and premium payments. A small amount of disability premium is allocated for postgraduate research provision. For FT UG and PGCE provision, funding is allocated through the per capita and expensive subject premium payments. For FT and PT postgraduate taught (PGT) provision, funding is allocated through the per capita payments. These funding allocations are described in more detail below.
- 2 The funded credit-based method for PT UG provision is based on a standard Unit of Funding (UoF) for each subject area. The funding is allocated by means of a formula. Funded credit values associated with core funding are based on the number of fundable credit values after adjustment for non-completions, taken from the latest available end of year data, and the number of funded credit values for the previous year. Core numbers in each HEP are maximised by making adjustments as far as possible in line with the pattern of enrolment in the end of year data. In order to calculate UoFs, the UoFs for the previous year are adjusted by an efficiency gain and increased by GDP, subject to availability of funding.
- 3 The funded credit based modelling for 2018/19 PT UG provision revealed that reduced recruitment in some areas resulted in a an overall reduced PT allocation in 2018/19 compared to 2017/18, with some providers having some unfunded (“fees only”) provision. As a result all fees only credits were converted into funded credits. Further information can be found in HEFCW circular “HEFCW’s Funding Allocations 2018/19” ([W18/10HE](#)).
- 4 HEFCW makes two other types of payments, for PT UG provision through per capita and premium payments, and for FT UG and PGCE through per capita and expensive subject premium payments. PGT provision receives per capita payments only. All are based on the numbers of enrolments or credits achieved the previous year. Details of criteria for inclusion are given in Annex B.
- 5 Per capita payments recognise the fixed costs attached to all students, those of enrolment, records etc. An amount per undergraduate and postgraduate taught enrolment is made, subject to a minimum study requirement of 10 credit values.

- 6 Premium payments based on HESA data operate in four areas: access and retention, disability, Welsh medium provision and expensive subjects. Different types of provision are included in the calculation of each, described in the paragraphs below
- 7 In 2018/19, the access and retention premium was an amount per PT UG enrolment for students from low participation areas plus an amount per undergraduate enrolment for students from the 52 Communities First cluster areas identified by Welsh Government in 2012, subject to a minimum 10 credit value study requirement. The amount per enrolment depended on several factors including whether the HEP has successfully retained the student and the proportion of Welsh domiciles at the HEP who are from Communities First areas.
- 8 The disability premium is an amount per enrolment for students in receipt of DSA, subject to a minimum 10 credit value study requirement. Disability premium payments are made in respect of FT and PT PGR and PT UG provision. The Welsh medium premium is a weighting on the funding attracted by modules undertaken through the medium of Welsh and is allocated in respect of PT UG provision only.
- 9 The expensive subject premium is allocated using data relating to FT UG students only. The premium is an amount per completed credit and is allocated using the number of completed credits in clinical medicine/dentistry and performance element provision at the Royal Welsh College of Music and Drama.

Funding for Postgraduate Research Training 2018/19

- 10 2018/19 PGR training funding was calculated using the HEP's confirmed postgraduate research enrolment figures from 2016/17. Grants to HEPs are calculated by applying a UoF to postgraduate research enrolments for particular groups of subjects. Qualifying enrolments are those in UoAs submitted to the 2014 REF where the UoA has 3 or more classified FTE Category A staff and meets a combined quality and volume threshold, i.e. those eligible for QR funding, within prescribed time limits for study: 3 and 2 years for a full-time PhD and MPhil respectively; 6 and 4 years for a part-time PhD and MPhil respectively.

Funding for Research 2018/19

- 11 QR funding is allocated to HEPs with UoAs submitted to the 2014 REF where the UoA has 3 or more classified FTE Category A staff and meets a combined volume and quality threshold (multiple submissions to UoA28 and joint submissions are exempt from the volume and sustainability thresholds). For 2018/19 funding, data were taken from the 2014 REF and the 2013/14 HESA staff and student records as the funding model and the data used are the same as those used in 2015/16 to 2017/18 QR funding allocations.

- 12 QR funding has three elements: a main allocation; a charity income allocation; and a rewarding excellence allocation. The main allocation is allocated by apportioning the available funding in proportion to research volume weighted for quality and subject. Previously calculated relativities between research costs are used for different subject areas. The parts of the volume measure relating to research students (RS), research assistants (RA), research fellows (RF) and charity income awarded through open, competitive processes (CI) are weighted in the volume measure (weights: RS=0.15; RA=0.1; RF=0.1; CI=0.25/25,000) and for RS and RA are taken from the 2013/14 HESA student and staff records respectively; for RF and CI are taken from the REF data with the data for CI being an average over two years of data from 2011/12 and 2012/13. Research active staff (REF category A) have a weighting of 1.0. Figures for research active staff are taken from the 2014 REF. The charity income element is allocated pro rata to the average charity income awarded through open, competitive processes. The rewarding excellence element is allocated pro rata to subject weighted volume in the 4* quality level. Total funding is calculated as the sum of the three elements, further details can be found in document 'HESA data to be used in 2015/16 QR funding' on our website: [Funding Calculations](#). Note that this method still applies to 2018/19 funding.

Eligibility Criteria for HESA based data used in funding

- 1 For all student based data, students should be active within the reporting period (1 August to 31 July), not studying the whole programme outside of the UK and not incoming exchange. In addition, students should be fundable by HEFCW. The methodology for extracting the data described below is available in more detail in the data requirements circulars (see paragraph 8 of the main part of this circular).

Per capita funding criteria for inclusion

- Student is studying at least 10 credit values.
- Student is studying on a full-time or part-time course.
- Student is studying at undergraduate or postgraduate taught level.
- Each student is counted only once irrespective of the number of courses the student is studying.

Access and retention premium criteria for inclusion

- Student's postcode is in a low participation area and/or a Communities First area.
- Student studying at least 10 credit values.
- Student is studying on a part-time course.
- Student studying at undergraduate level.
- Each student is counted only once irrespective of the number of courses the student is studying.

Disability premium criteria for inclusion

- Student is in receipt of DSA.
- Student studying at least 10 credit values, or 8.3% FTE for postgraduate research students.
- Student is studying on a full-time or part-time course at postgraduate research level, or on a part-time course at undergraduate level.
- Each student is counted only once irrespective of the number of courses the student is studying.

Welsh medium premium criteria for inclusion

- Student studying on a part-time course at undergraduate level.
- Student studying at least 2 credits of a module through the medium of Welsh.
- Student not studying on a Welsh language or literature module.

Expensive subjects premium criteria for inclusion

- Student is studying on a full-time or sandwich year out course.
- Student is studying at undergraduate level.

- Each student is counted only once irrespective of the number of courses the student is studying.
- Module is started in the academic year and returned as countable.
- Module is completed.
- Duplicate modules are excluded.
- Credits are categorised by subject, where subject is in clinical medicine/dentistry or performance element provision at RWCMD.
- All years of study are included.

Postgraduate research training funding criteria for inclusion

- Studying for a postgraduate research qualification.
- Enrolments must be in UoAs submitted to the 2014 REF where the UoA is included in QR funding eligibility calculations.
- Funding is limited to 3 years for a full-time programme of study leading to a PhD and 6 for a part-time programme. Limits for MPhil programmes are set pro-rata to those for PhDs. Funding against transfers from MPhil to PhD is available only for the balance of time up to the limits for PhD.
- Each student counted only once irrespective of the number of courses the student is studying.

Eligibility criteria for data used in Corporate Strategy targets

- 1 For all student based data used for monitoring, students should be active within the reporting period, not dormant, sabbatical or writing up, not primarily studying outside the UK and for all but the overseas indicator, not incoming exchange. Data used in monitoring the targets in the scope of the audit are taken from HESA student record, DLHE survey, finance record and HEBCI survey returns for HEIs. HESA student record data are also used for FEIs. The methodology for extracting the data described below is available in more detail in the data requirements circulars (see paragraph 8 of the main part of this circular). Students and/or provision, CPD data and income data at HEIs are used in the monitoring of the indicators based on the following criteria:

Widening Access – ‘A rise in the proportion of all Welsh domiciled students studying higher education courses at higher education institutions and further education institutions in Wales who are domiciled in the bottom quintile of Lower Super Output Areas (LSOAs) in the Welsh Index of Multiple Deprivation (WIMD) or in Communities First cluster areas, from 20.1% in 2011/12 to 22.4% in 2017/18 (a rise of 11.6%).’

- Student’s postcode is a valid postcode mappable to a LSOA in Wales.
- To be counted in the numerator, the student’s postcode is in the bottom quintile of LSOAs in the WIMD or in a Communities First cluster area.
- Each student counted only once irrespective of the number of courses the student is studying.

Participation – ‘An increase in the proportion of all UK domiciled students studying higher education courses at higher education institutions and further education institutions in Wales who are from UK low participation areas from 33.2% in 2011/12 to 35.3% in 2017/18 (a rise of 6.3%).’

- Student’s postcode is a valid postcode mappable to a ward in the UK.
- To be counted in the numerator, for full-time students aged less than 21, the postcode is in the 40% of areas with the lowest participation as defined by POLAR3, and, for all other students, in the 40% of areas with the lowest participation as defined by the proportion of working age adults with HE level qualifications.
- Each student counted only once irrespective of the number of courses the student is studying.

Retention – (a) ‘A decrease in the percentage of full-time undergraduate students no longer in higher education following year of entry from 9.2% in 2011/12 to 8.2% in 2017/18(a drop of 10.7%)’

(b) ‘A decrease in the percentage of part-time first degree students no longer in higher education two years following year of entry from 33.7% in 2011/12 to 30.1% in 2017/18 (a drop of 10.7%)’

- Data are taken from the HESA UK performance indicators, Tables 3a, 3d, and 3e, which are derived from data collected on the HESA student record.
- Target (a) relates to full-time undergraduate UK domiciled entrants and target (b) relates to part-time first degree UK domiciled entrants.

Part-time Students – ‘The percentage change in the number of part-time students attending higher education courses in Welsh higher education institutions and further education institutions to be equal to, or greater than, the comparable figure for the UK.’

- The student is part-time.
- Each student counted only once irrespective of the number of courses the student is studying.

Welsh Medium – ‘The number of students studying higher education courses at Welsh higher education institutions and further education students in Wales undertaking at least 5 credits of their course through the medium of Welsh, per annum, will rise from 4,335 in 2011/12 to 5,600 in 2017/18, including a rise from 2,269 to 3,030 in the number of those studying at least 40 credits per annum.’

- The module is started in the academic year.
- Students taking some element through the medium of Welsh identified where at least one module has a greater than zero percentage through the Welsh language.
- Credits through the medium of Welsh are counted as the credit points for the module multiplied by the percentage through Welsh.
- Each student is counted only once irrespective of the number of courses the student is studying but all credits taken by the student through the medium of Welsh are counted.

Overseas Students – ‘The percentage change year on year in the number of overseas students attending higher education courses in Welsh higher education institutions will be equal to, or greater than, the comparable figure for UK higher education institutions (excluding London and the South East of England).’

- Student’s domicile is outside the EU (including incoming exchange).
- The Channel Islands and Isle of Man are not counted as overseas for the purposes of this target.
- Each student is counted only once irrespective of the number of courses the student is studying.

Employment – ‘The proportion of leavers from Welsh higher education institutions obtaining undergraduate qualifications through full-time or part-time study who were employed, studying or both six months after leaving will be equal to, or greater than, the UK proportion’

- Data are taken from Table E1 of the HESA UK Performance Indicators derived from data collected on the HESA DLHE survey.
- Base population is all home-domiciled respondents to the survey who are classed as working and/or studying or as unemployed and seeking work.

Employability – ‘The proportion of leavers who were working or working and studying who were working in a managerial/professional job six months after leaving to rise from 67.5% in 2010/11 to 72.7% in 2017/18 (a rise of 7.7%).’

- The student is home and EU domiciled.
- The student has left the instance.
- The student was not awarded a qualification from dormant status.
- An HE qualification was awarded.
- The student left in the reporting year.
- The student responded to the DLHE survey.
- The student was working or working and studying.
- The student was in a managerial/professional job.

Initial Teacher Training – ‘Welsh Government targets for ITT undergraduate primary, postgraduate primary, undergraduate secondary, postgraduate secondary priority and postgraduate secondary other subjects to be met annually.’

- The student is studying on an ITT (QTS) course.
- The student is full-time and started between 1 August and 1 November and did not leave in that period.
- Each student is counted only once irrespective of the number of courses the student is studying.

Continuing Professional Development – ‘The total number of learner days delivered by Welsh higher education institutions for continuing professional development (CPD) will rise from 202,498 in 2011/12 to 226,000 in 2017/18 (a rise of 11.6%).’

- The total number of learner days of CPD/Continuing Education courses being delivered taken from part B, Table 2, item 3f of the HESA HEBCI survey.

Collaborative Research Income – ‘The total amount of income from collaborative research involving both public funding and funding from business will rise from £65,294k in 2011/12 to £72,000k in 2017/18 (a rise of 10.3%)’

- Total collaborative research income taken from part B, Table 1, item 1e of the HESA HEBCI survey.

Research Council Income – ‘The annual percentage change in income from Research Councils will exceed the comparable figure for UK higher education institutions (excluding institutions in the ‘golden triangle’ of Oxford, Cambridge and London).’

Annex C

- Data are taken from Table 5b of the HESA Finance Statistics Record.
- The Open University is included as a wholly English university.

Recommendations from previous audits

- 1 The following provides a summary of the recommendations made on the internal audit reports submitted to HEFCW in May 2018 and from the external audits carried out in 2017/18. Where a recommendation relates to more than one stream of data, the recommendation has been included under all relevant streams. The same or similar recommendation made at more than one HEP is included only once. Findings for past audits can be found in previous versions of these notes.

Student data

- **Procedures:**
 - Clear, concise and user friendly operational procedures should be developed to ensure accurate HESA student returns are prepared and submitted even in the absence of key staff. The new documentation should be regularly reviewed and kept up to date as the data landscape changes e.g. the data futures project.
 - Staff responsible for transcribing paper enrolment forms should be issued with guidance relating to the proper coding of details to the student information management service.
 - An exercise should be carried out to ensure that current profiles of users of the student information management service are appropriate and are reviewed on a periodic basis.
 - All Colleges/ Departments should have read only access to the student information management service to ensure that data amendments are only performed centrally by Academic Services and not by Colleges / Departments, with a view to reducing input errors and blank data fields.
 - A summary report of the data submitted to HESA will be presented to the Group's senior management team which will include the number of students by mode and level and/or course and subject with comparisons to prior years and/or other returns.
 - Validation checks should be undertaken by the Curriculum Manager of Business Management to confirm the accuracy of the data on the MIS system to the course data on their records.
 - All contracts between the University and franchise partners should be signed by both parties before the student commences with their programme of study with the partner and before any student data is shared between the University and the franchise partner.
- **Welsh medium:**
 - All departments should document the list of modules they run that are taught wholly or partially through the medium of Welsh, and for each module the proportion of teaching in Welsh and English is recorded following the method of calculation published by Coleg Cymraeg Cenedlaethol.
 - Percentage figures regarding provision of courses through the medium of Welsh that are submitted for approval should also be supported by workings and supporting documentation.

- A consistently applied process should be introduced that results in the availability of verifiable data on percentages of modules taught in Welsh, for the purpose of inclusion within the Student Record.
- **Other:**
 - Consideration should be given to reviewing the way in which mobility data is recorded with a view to ensuring that all data is held in one system in order to improve data accuracy and enhance record keeping.
 - Consideration should be given to reviewing the current staffing arrangements within Academic Services to ascertain whether there is sufficient resource to implement any potential new requirements of Data Futures. The HESA Data Futures preparation assessment tool should be utilised to assist preparations.

Fee and Access Plan (FAP) submissions and Annual Monitoring Statements (AMS)

- A procedure for the development and monitoring of the Fee and Access Plan should be documented to ensure a consistent approach is applied.
- New fee income figures included on the FAP AMS should be reconciled to the relevant audited accounts.
- Monitoring of performance against the Fees and Access Plan should be reviewed at Committee/ Group level on an ongoing basis (i.e. added as a standing agenda item for discussion).
- The risk register should be updated to include the risk of not meeting the targets agreed within the Fees and Access Plan

Other records and general

- **Finance, Staff and HE-BCI record:**
 - An audit trail should confirm that the HESA Finance return is compiled as required by the HESA guidance.
 - An appropriate senior member of staff in the faculty should sign off data in their specialised area. For, example, the HR Manager should sign off each member of staff on the staff record.
 - Procedural documentation relating to the completion of the HESA Finance return should be produced and a member of staff should be trained on the completion requirements of the return.
 - Procedure notes should be implemented in line with the HEFCW circular Guidance for Internal Auditors issued each year, and that the Finance Statistics Return is standardised to those used for the other returns e.g. HESA Student.
 - A Register of Items should be developed incorporating all the key returns covered in the HEFCW guidance. The Register will include due dates, responsible officers and the source of the information being provided.
- **Roles and responsibilities:**
 - A number of recommendations specific to the individual provider's structure were made relating to ascertaining responsibility for key roles and functions.