CASPIAN
SCHOOL OF ACADEMICS

Procedure 9.2
OVERSIGHT OF INFORMATION AND DATA RETURNS

Data Governance and Management | August 2026

Oversight of Information and Data Returns

Data Governance and Management

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1. Purpose

This procedure sets out the processes and responsibilities for ensuring the integrity, accuracy, and compliance of statutory and regulatory data returns. It outlines the roles of the Board of Governance and the Audit, Internal Controls and Risk Management Committee (AICRM) in overseeing data quality and related risks, and oversight by the Executive Management Team and as appropriate, the Senior Management Team to ensure cross-institutional understanding.

2. Scope

This procedure applies to all statutory data returns including, but not limited to:

- Prevent Duty Monitoring
- OIA Return
- HESA Student Record
- HESA Staff Record
- HESES Return
- Financial Statements and Annual Financial Return
- Graduate Outcomes Data

It includes internal review, monitoring and escalation of risks, and assurance reporting mechanisms.

3. Roles and Responsibilities

3.1 The Board of Governance

The Board of Governance has ultimate accountability for ensuring that the Caspian School of Academics (CSA) meets its regulatory obligations, including Conditions F1, F3, and F4 of OfS registration. The Board also:

- Receives and reviews strategic risk updates related to data compliance.
- Reviews an annual **Data Assurance Report** prepared by the AICRM.

3.2 Audit, Internal Controls and Risk Management Committee (AICRM)

The AICRM is responsible for the oversight of data management and evaluating integrity risks as part of its risk and internal control remit. The AICRM also:

- Reviews internal and external audit findings on data returns.
- Ensures robust internal controls exist for the collection, validation, and submission of data.
- Recommends improvements to the Board of Governance where weaknesses are identified.
- To receive reports on data compliance and key issues from internal and external sources.

3.3 Accountable Officer

The Chief Executive Officer (CEO) is the accountable officer for finance and data management and submitting statutory returns to key bodies including HESA, OfS and awarding bodies.

- Signs off statutory returns on behalf of the School.
- Seeks assurances from the managers on the accuracy and completeness of submitted data.
- Delegates operational responsibility to relevant data leads.

3.4 Data Owners / Leads (Operational)

Heads of department or managers responsible for specific data streams (e.g. Registry, Finance, HR) must:

- Ensure compliance with internal policies impacting data returns.
- Complete internal validation checks before submission.
- Report data issues to the AICRM via the Registry Manager.

4. Data Integrity Assurance Process

4.1 Data Preparation and Validation

The CEO, supported by the Registry team, will ensure that:

- All returns are subject to local validation against source systems (e.g. student records, HR, finance).
- A named data lead prepares a validation summary, highlighting any data limitations or assumptions.
- Validation logs must be maintained to support audit trails.

4.2 Pre-submission Review

- All major returns are subject to review by an independent member of staff (e.g. Programme Leader or Head of Student Services) to test data logic and risk.

4.3 Executive Review and Sign-Off

The Accountable Officer signs off returns based on a summary assurance pack including:

- Validation results
- Key risk indicators
- Narrative of assumptions
- Governance sign-off

4.4 Audit and Committee Oversight

Internal audit conducts periodic reviews of return processes (at least annually for high-risk returns), and the AICRM receives:

- Termly updates on return activity and issues.
- Internal audit findings on data processes.
- A summary of external regulator feedback (e.g. OfS queries or audits).
- Recommendations for improvement to be tracked and monitored.

5. Risk Management and Escalation

The Executive Management Team, together with the AICRM, is responsible for overseeing data integrity risks and ensuring that:

- All known or potential data integrity risks are logged in the School Risk Register.
- High-impact issues (e.g. errors that may lead to a regulatory breach) are escalated to the AICRM and then, where appropriate, to the Board of Governance.
- Mitigation plans and timelines are developed, their effectiveness is monitored, and significant issues are reported to the Board of Governance.

6. Annual Data Assurance Reporting

Each year, the AICRM submits a report to the Board of Governance summarising:

- The status of all statutory data returns.
- Key risks and issues identified.
- Outcomes of internal or external audits.

- Actions taken and improvements made.
- Any breaches or compliance concerns (including OfS reportable events).

7. Review and Continuous Improvement

- This procedure is reviewed annually by the Board of Governance.
- Amendments must be approved by the AICRM and noted by the Board of Governance.
- Lessons learned from audit, regulatory review, or internal incidents are incorporated into procedural updates.