



Leeds Trinity
University



Data Quality Policy

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Context

- 1 All public bodies need timely, accurate and reliable data in order to manage their activities and also account for their performance through accurate reporting.
- 2 Specifically Leeds Trinity needs to ensure its data quality so that it can:
 - Provide effective and efficient services to its students, staff and partners
 - Produce accurate and comprehensive management information on which timely, informed decisions are made to inform the future of the institution
 - Monitor and review its activities and performance
 - Produce accurate external returns to ensure accurate funding allocations and account for performance as required
 - Meet the terms of the Memorandum of Assurance and Accountability and the requirements of the Information Commissioner

Scope

- 3 The scope of this policy includes data held in the institution on all corporate systems and any data collected from these systems which is re-presented or manipulated to inform analysis and reporting.
- 4 This policy will fit into a framework of documentation and an annual process of assuring data quality at Leeds Trinity University.

Responsibility for Data Quality and Data Quality Assurance

- 5 The Memorandum of Assurance and Accountability and Audit Code of Practice includes requirement for audit committees of all HEIs to give, as part of their annual opinion, assurance over 'management and quality assurance of data submitted to HESA and to HEFCE and other funding bodies'.
- 6 The Code states assurance should be provided that the HEI :
" ...Has effective arrangements for the management and quality assurance of data submitted to HESA, the Student Loans Company, HEFCE and other funding or regulatory bodies (HEFCE reserves the right to use and publish its own estimates of data, where we are not satisfied that the HEI or FEC data are fit for purpose. HEFCE also reserves the right not to publish data). Responsibility for the quality of data used for internal decision-making and external reporting, which must be fit for purpose, rests with the HEI or FEC itself. " (Page 8, paragraph 29 i.)
- 7 HEFCE's guidance to audit committees on how they need to reach the required opinion on data quality states that the committee "needs to be sure that management has assessed the risks posed by data accuracy and taken appropriate mitigating actions"¹.

¹ <http://www.hefce.ac.uk/whatwedo/reg/assurance/guidance/audit/>

- 8 Although ultimate responsibility for data quality assurance lies with the Board of Governors it is an integral part of the role of all members of staff to ensure that they follow the principles of this policy in order to maximise the accuracy, timeliness and quality of data collected and recorded, analysed and reported.

Risk

- 9 Key risks relating to data as identified by HEFCE² are as follows:
- Mandatory conditions of grant could be breached;
 - Data could give misleading external and internal impressions of institutional performance;
 - Poor data could result in inappropriate decision-making by management across the institution;
 - Inaccurate data could lead to under-funding;
 - Inaccurate data could lead to over-funding with subsequent clawback of overpaid funds which, if significant, could impact adversely on the institution's financial health;
 - Inaccurate data could lead to reduced future funding (holdback) thereby undermining cash flow forecasts and adversely affecting financial health; and
 - An institution which submits inaccurate data could suffer reputational damage with public and private funders, other stakeholders and the public.
- 10 Accordingly, Leeds Trinity University includes data quality as a key risk.

“Good Quality” Data

- 11 In March 2007, the Audit Commission published a framework³ to support improvement in data quality in the public sector. This framework includes six key characteristics of good quality data which may be summarised as follows:

11.1 Accuracy

Data should provide a clear representation of the activity/interaction
Data should be in sufficient detail
Data should be captured once only as close to the point of activity as possible

11.2 Validity

Data should be recorded and used in accordance with agreed requirements, rules and definitions to ensure consistency

11.3 Reliability

Data collection processes must be clearly defined and stable to ensure consistency over time, so that data accurately and reliably reflects any changes in performance

11.4 Timeliness

Data should be collected and recorded as quickly as possible after the event or activity

² <http://www.hefce.ac.uk/whatwedo/reg/assurance/guidance/audit/>

³ *Improving information to support decision making: standards for better quality data*; Audit Commission; March 2007

Data should remain available for the intended use within a reasonable or agreed time period

11.5 Relevance

Data should be relevant for the purposes for which it is used
Data requirements should be clearly specified and regularly reviewed to reflect any change in needs
The amount of data collected should be proportionate to the value gained from it

11.6 Completeness

Data should be complete
Data should not contain redundant records

Data Quality Objectives

12 The characteristics of good data quality in 11 above will be adopted by Leeds Trinity University. The five objectives below set out what we aim to achieve and the supporting checklist prompts set out our approach to how these objectives will be achieved.

12.1 Appropriate Responsibility, Accountability and Awareness

- Every member of staff should recognise the need for good quality data and how they can contribute to it
- Every member of staff should be aware of their individual responsibilities with regard to data collection, storage, analysis and reporting
- Every member of staff should be aware of the implications of poor data quality in their area in terms of internal and external accountability including those affecting other departments and the institution as a whole
- Every member of staff should report any systematic data quality issues immediately to their line manager who should ensure remedial action is taken

12.2 Appropriate Policies and Procedures

- The institution should define clearly its key data requirements and assurance arrangements
- Local procedures must exist for all key activities such as major data collection exercises and external returns
- All such policies and procedures should be reviewed regularly to consider their impact on data quality and to ensure they reflect any change in need
- Departmental managers should ensure that all such policies and procedures are adopted and embedded within working processes and that compliance is achieved

12.3 Appropriate Systems and Processes

- Clear systems/business processes should exist in which data collection and reporting are an integral part
- Guidelines for all processes supporting key data requirements as defined by the institution should exist and be followed consistently across the institution

- Data should be collected and recorded once only wherever possible without the need for multiple systems
- Data collection systems should contain internal validation to ensure accurate and complete data
- Corporate systems should have internal validation checking facilities to ensure data is complete, consistent and internally validated
- All systems should be electronic wherever possible to reduce the risk of manual error, except where there is a need to collect, process and store original documents

12.4 Appropriate Security

- The institution should have in place appropriate security arrangements to ensure that data is protected from unauthorised access from outside the institution
- All corporate systems should have security arrangements in place to ensure appropriate levels of access to data by individual staff and students

12.5 Appropriate Staff Development

- All members of staff and students accessing, inputting and amending data on corporate systems should have the appropriate knowledge and skills to carry out the activity and preserve data quality.
- All policies, procedures and guidelines should be communicated effectively to relevant staff and students
- Appropriate staff development/training should be provided at induction and periodically to enable staff to meet the objectives of this policy and be reviewed and updated to reflect any change in need

Reporting and Representation of Data

- 13 All management information reports should be clear in what they are representing and should be regularly reviewed to ensure that they reflect any change in need. This review should be balanced with the need for consistency over time so that trends can be recognised and reported.
- 14 External returns should be subject to rigorous validation and verification, submitted on a timely basis and should evidence a full audit trail, including appropriate approval and sign off as specified by the body to whom the return is to be submitted. As a general rule the person producing the return should not be responsible for final sign off. Final sign off will be the responsibility of a member of the Executive Team unless otherwise previously agreed by the Vice Chancellor.

Implementing this Policy

- 15 All Heads of Department responsible for key Corporate Systems, data collection, analysing and reporting will be asked to produce an annual data quality plan setting out how each of the objectives of this policy are, or will be, met in their area.
- 16 These annual data quality plans will form part of the annual data quality assurance exercise currently reported to the Audit Committee to help inform their opinion on data quality.