

# DATA QUALITY POLICY

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## 1. Introduction

## 1.1 Purpose and Scope of the Policy

All effective organisations measure their performance in order to know how well they are performing and to identify opportunities for improvement. It is a vital component in the drive to improve services.

The effective use of performance measurement depends on indicators that are robust and accurate. There needs to be sufficient data available to effectively analyse it and interpret it to be sure performance is on track and provide an early warning if targets may be missed.

Performance information has grown in importance to external agencies as a means of assessing the Council as an organisation. It is no longer just a case of assessing how an outturn figure for a performance indicator has been achieved; there is now a need to audit the systems we have in place to secure the quality of the performance data. Auditors will need to be satisfied that robust systems are in place for data collection and reporting to ensure that any performance data reported has a high degree of reliability.

Braintree District Council recognises the importance of reliable information to the delivery of excellent services to its customers. Data quality is crucial and the availability of complete accurate and timely data is important in supporting customer care, corporate governance, management decisions, service planning, accountability and adherence to audit and inspection processes.

The Council has a requirement to make large datasets publically available. The intention is that this should increase the Councils transparency and accountability to residents of the district.

This policy supports any data collection including personal information such as customer contact details held within various systems across the Council and will therefore apply to all services.

The purpose of this policy is to set out the Council's approach to improving and maintaining a robust data quality process across the Council. High quality and timely performance information is vital to support good decision making and continuously improve service delivery outcomes.

## **1.2 Policy Objectives**

Braintree District Council is committed to ensuring it maintains the highest standards of data quality. In order to achieve this, our objectives are to:

- Ensure that performance information in use meets the characteristics of high quality data and is accurate, valid, reliable, timely, relevant and complete
- Ensure that data supporting performance information is used to manage and improve the delivery of services for local people
- Document and communicate expectations and requirements in respect of the standards of data quality from our staff and elected members
- Develop and support a culture of valuing high quality data

- Ensure that the right resources, people and skills are in place to ensure that we have timely and accurate performance data
- Ensure that data is stored, used and shared in accordance with corporate standards and relevant legislation (e.g. Data Protection Act and Freedom of Information Act)
- Ensure data meets external inspection/audit standards and requirements

## 2. Why is data quality important?

The quality and cost of public services depend on the decisions that people make. Poor quality information can lead to poor decisions or inappropriate conclusions that can affect our services and so impact on the lives of Braintree district residents.

As the size and complexity of an organisation increases, so does its dependency on systems, processes and technology to manage its information. The person who is responsible for recording a particular item of data may be several steps removed from the person who is responsible for using that data. This increases the risk that the data is inaccurate, out of date, incomplete, missing or simply misinterpreted. Therefore, good quality data which is collected, captured and stored in the right way, should then be turned into fit-for-purpose information which is well analysed, relevant and right for context and used to inform good quality decisions.

The key risks arising from relying on information which is not fit-for-purpose are significant and may include:

- Mistakes and delays in providing a service,
- Unnecessary costs, both at operational level and strategic level
- Failure to spot and address performance concerns
- Breaches of information security
- Published information which is misleading
- Poor use of council resources
- Failure to improve services
- Poor policy decisions
- Not recognising and rewarding good performance

For services responsible for producing, analysing or interpreting data, they must develop a good understanding of the needs of their customer groups and make sure that the information provided to customer is fit for purpose, easily accessible and up to date so customers can make informed choices. Services are also responsible for ensuring customer records are accurate and kept up to date.

The governance of information has a number of legislative and guidance areas as follows:

Data Protection Act 1998	Personal Information must be handled and stored in a confidential manner
Regulation of Investigatory Powers Act 2000	Councils can collect and use information from a covert or human intelligence service for the purpose of investigating crime which may be subject to disclosure
Freedom of Information Act 2000	Public Authorities, if requested, must disclose information that they hold

Environmental Information Regulations 2004	Public Authorities if requested must disclose environmental information that they hold
Local Government Transparency Code	All Local Authorities must publish the datasets required by the code, in some cases in prescribed format
Re-use of Public Sector Information regulations	Encourages the re-use of public sector information by third parties for purpose no other than the initial public task it was produced for. Governs what and how information has to be made available for re-use

# 3. Characteristics of good quality data

Detailed below are key characteristics of good quality data and will form the Councils approach to data quality:

Accuracy	Data should be sufficiently accurate for its intended purpose, representing clearly and in enough detail the interaction provided at the point of activity. Data should be captured once only, although it may have multiple uses. Accuracy is most likely to be secured if data is captured as close to the point, and time of activity as possible. Reported information that is based on accurate data provides a fair picture of performance and should enable informed decision making.
	The need for accuracy must be balanced with the importance of the uses for the data and the costs and effort of collection. For example, it may be appropriate to accept some degree of inaccuracy where timeliness is important. Where compromises are made on accuracy, the resulting limitations of the data should be clear to their users. This must be a judgement determined by the local circumstances and is unlikely to be appropriate in the case of the data supporting published performance indicators.
Validity	Data should be recorded in an agreed format and used in compliance with relevant requirements, including the correct application of any rules or definitions. When used to analyse trends, data must be consistent between periods. All performance indicators must have a clear owner who is responsible for confirming the validity of the data. In the absence of a data owner, whoever is producing or publishing the data must assume responsibility for ensuring its validity.
Reliability	Data should reflect stable and consistent data collection processes across collection points and over time, whether using manual or computer based systems, or a combination. Managers and stakeholders should be confident that progress towards performance targets reflects real change rather than variations in the methods or approaches in data collection. Wherever possible, changes in definition must be avoided in order to be able to provide consistent trend data overtime.
Timeliness	Data must be captured as quickly as possible after the event or activity it records and must be made available for the intended use within a reasonable time period deemed appropriate for its use. Data must be available quickly and frequently enough to

	support information needs and to influence service or		
	management decisions.		
Relevance	Data captured should be relevant to the purposes for which it is		
	being used. Data must be reviewed periodically to reflect		
	changing needs or circumstances.		
Completeness	Data needs to be complete, representative and unbiased. Sufficient information should be collected and to a suitable quality, as it is needed to draw significant or meaningful conclusions. For example, if captured by survey, the data needs to be free from bias and the sample robust and representative of the wider population. Also needs to be relevant to what the organisation is aiming to achieve.		
	Performance Indicator owners must be notified of gaps in datasets in order that they can be addressed. Missing, incomplete or invalid records can provide an indication of data quality and can also point to problems in the recording of data items		
Secured	Information is stored safely and with appropriate access controls. Sensitive information is only used for the purpose it has been collected for, and only retained for as long as it is needed. Information is only shared with others where the council is satisfied that appropriate controls and safeguards are in place. The access and use of data should be appropriate to the data user and comply with relevant legislation such as the Data Protection Act		

## 4. Policy Principles

The following principles underpin good performance data quality:

#### Awareness

Data quality is the responsibility of every member of staff entering, extracting or analysing data from any of the Council's information systems. Every relevant officer should be aware of their responsibilities with regard to data quality. The commitment to data quality will be communicated clearly throughout the Council to reinforce this message.

### Definitions

All staff should be aware how their day to day activities contributes to the calculation of performance indicators and how lapses can either lead to errors or delay reporting both of which can limit our ability to manage performance effectively.

Responsible officers should have an understanding of what the numerator and denominators are and have a working knowledge of any technical guidelines/instructions on how to calculate the data correctly. Everybody should have an understanding of any performance indicators affected by the data they produce.

Clear definitions and formulas for calculating outturn figures need to be established for local performance indicators that everyone can follow.

Every performance indicator should have a named officer who is responsible for collecting and reporting data along with a named responsible officer, who holds

responsibility for cross checking the calculation methodology and the outturn figures produced. Audit trails need to be kept of any changes in definitions that occur.

#### Data Capture

There must be adequate controls over the input of data aiming for 100% accuracy at all times. Officers should have clear guidelines, procedures and adequate training (where applicable) for using systems to ensure information is entered correctly and consistently.

Officers need to ensure that when entering data into the performance management system they are clear as to whether the figure required is a snapshot of the current period or a year to date figure. System notes are required to explain the performance and evidence of the outturn figure either uploaded to the performance management system or kept for a minimum of a year for auditing purposes. Supporting evidence can take the form of spreadsheets, screen dumps, links to a database or a description of where the supporting information is kept.

#### Controls

Data requirements should be designed along the principle of 'getting it right first time, every time'.

It may be necessary to undertake verification tasks, such as:

- Data cleansing removing duplicate records or filling in missing information
- Spot checks on the data quality provided by third party
- Reconciliation of systems produced data with manual records
- Sample checks to eliminate reoccurrence of a specific error

A number of performance indicators rely on information provided by external sources and officers need to ensure that the data received from them is relevant, timely and accurate. It is important to ensure that where data is provided by an external source, there are clear guidelines about their responsibilities for data quality.

#### Systems

It is vital that the systems used to collect, store and calculate performance information are accurate and any faults or errors are identified. All systems need to be checked and tested regularly.

Each data collection system needs to be maintained by the responsible officer who would be required to ensure that local data collection systems are robust and ensure that:

- Users are adequately trained and guidelines/instructions are available
- Access to systems are secure (where applicable)
- Periodic tests of data integrity are undertaken checking that the raw data and calculations produce accurate results
- System upgrades are implemented where necessary
- Amendment to performance indicator definitions are updated as necessary
- The system meets managers information needs
- Adequate back up procedures for saving and restoring data are in place.

Continuous improvement of systems is also important in ensuring that data produced is at the highest quality.

There are a number of conditions that need to be considered if a data collection system is to be classed as robust. 'High risk' conditions will include:

- A high volume of data/transactions
- Technically complex definitions/guidance
- Problems identified in previous years
- Inexperienced staff involved in data processing or the production of performance indicators
- Systems being used to produce a new performance indicator
- Data for the indicator is supplied by a third party
- Known gaps in the control environment

Data quality is a consideration when reviewing the Councils Strategic Risk Register and some high risk performance indicators may also be included in the operational risk register.

#### Reporting

Regular reporting of accurate information leads to good decision making and improved performance.

Performance information is subject to scrutiny and challenge at a directorate level before it is presented to Management Board, Cabinet or published to external parties. This allows for management actions to be taken to improve performance.

Spot checks on performance indicators will be carried out on a sample basis to check data quality ensuring performance information is accurate.

Some performance indicators are reported to external bodies, including central government. It is important that the reporting made through government returns and other submissions maintain high standards of data quality.

#### Presentation

Information regarding the performance of an indicator needs to be presented in such a way as to give an easily understood and accurate picture of our performance to external inspectorates and the public.

## 5. Effective Partnership Working

As the Council increases partnership working with other organisations and relies on the information they supply, it is crucial that this information is of a high quality.

The Council must ensure data that is shared with and received from partners is accurate and appropriate. When entering into partnerships, it is vital that the responsibilities for ensuring data quality are clearly identified in partnership documentation or service level agreements (SLA). We need to:

- Specify our data/information requirements at the outset of a contract
- Assert our ownership of data about service users through appropriate contract clauses
- Set clear data quality standards for provider organisations
- Develop consistent mechanisms for collecting and managing data from providers

- Seek opportunities to share data across partnerships to develop a greater collective understanding of local needs and performance
- Personal data shared must be supported by the appropriate legal consideration and specific data sharing agreements which comply with the requirements of the Data Protection Act 1998

#### Whole Essex Information Sharing Framework (WEISF)

A formal framework for sharing data with partners has been set up to provide partners with templates, national guidance, networking and support and has a transparent approach to sharing information.

Adopting consistent good practice will enable information sharing which complies with fair and lawful exchanges and the expectations of citizens when sharing their information.

The lead for WEISF at Braintree is lan Hunt.

## 6. Roles and Responsibilities

All staff are responsible for data quality and to ensure that data is fit for purpose. Commitment to data quality will be clearly stated in job descriptions where relevant.

**Cabinet Member for Performance** - has overall member responsibility for performance and need to be pro-active in raising issues around data quality challenging progress made against corporate and service data quality objectives.

Directors - have overall responsibility for challenging performance and data quality.

**Heads of Service** – are accountable for the accuracy and quality of performance data and information within their service area and need to ensure their staff are aware of their data quality requirements.

**Service/Team Managers** – are responsible for the accuracy and quality of performance data and information, undertaking necessary checks and complying with the guidance as well as identifying and implementing improvement measures to improve the quality of data.

**Contracts Managers** – are responsible for building the necessary data quality standards into contracts or SLA's and, where appropriate, building in the necessary audits and checks to assure the quality of that data

**Collection Officers** – are responsible for ensuring that the data collection systems are robust. They will be able to identify and implement improvement measures to improve the quality of data and must keep up to date with current guidance on all performance indicators.

**Performance Indicators responsible officers and owners** – are responsible for the accuracy and quality of performance data and information and for cross checking the calculation methodology and the outturn figures produced. They also need to highlight any measures for improving data quality and need to keep abreast of the latest guidance and performance indicator definitions.

All staff and elected members – need to be aware of the data quality policy and where applicable, should be aware how their day to day activities contribute to the

calculation of performance indicators. They are responsible for taking reasonable steps in keeping customer data accurate and up to date in line with the requirements of the Data Protection Act.

**Internal Audit** – have responsibility for securing data quality as part of their responsibility for corporate governance and risk management.

**Performance and Improvement Team** - work closely with Internal Audit to help improve data quality. Maintains the Councils performance management system ensuring system updates are communicated to all staff and comprehensive training is provided.

**Performance and Improvement Manager** – is responsible for corporate coordination, reporting and monitoring of performance indicators including data checks and challenge meetings. Reports any concerns in data quality that have been identified.

Supports the audit process both internal and external carrying out sample checks to ensure data quality on performance indicators and provides help, support and guidance for any data quality issues that arise.

## 7. Applying the policy

This policy applies to all employees of Braintree District Council as it is clear that all staff have a responsibility for data quality. It is accepted, however, that certain officers will have greater lead responsibility for activities to secure a high standard of data quality.

Internal Audit plays an important role in securing quality data within the council. The Performance and Improvement Team and individual services will continue to work closely with Internal Audit where appropriate to help improve data quality.

## 8. Monitoring and Review

The Cabinet Member for Corporate Services and Asset Management is responsible for agreeing, monitoring and reviewing the implementation of the Data Quality Policy.

A number of activities and actions are required to maintain quality data and to achieve this; there is an associated delivery action plan with identified actions and responsibilities which will be reviewed and refreshed annually.

## Data Quality Action Plan

The table below details what we will do to improve data quality to ensure a consistent approach is applied across the Council.

Action	Priority	Responsibility	Date	Comments
Governance and Leadership				
Ensure new officers complete the compulsory Vision training module on data quality within 3 months of their start date	High	All SUM's	On-going	Managers to ensure that new officers complete this in their induction to their role.
Data quality issues are highlighted to Internal Audit or Performance and Improvement Team	Medium	Internal Audit Performance and Improvement Team	On-going	
Review Performance Indicators annually within the business planning process to ensure Performance Indicators in Business Plans are relevant, robust and accurate data can be provided	High	All SUM's Performance and Improvement Team	April 2017	
People and Skills	1			
Staff using the performance management system will have access to the most up to date procedure manual or user guidance.	Medium	Performance and Improvement Team	March 2017	New version of Covalent rolled out in 2016/17 and revised procedure manuals issued alongside training.
Performance Indicator owners are familiar with their responsibilities for handling data and calculating performance information	High	Performance Indicator Owners	March 2017	
Provide advice on ensuring that projects as details in Business Plans are SMART	High	Performance and Improvement Manager	March 2017	

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Systems and processes	Systems and processes			
Review all Performance Indicator guidance published on the performance management system to ensure it is up to date, relevant and robust	Medium	Performance and Improvement Team	March 2017	
Implement a routine of sample checking performance information published in the Annual Plan and where poor quality data is identified, agree a means of addressing with the relevant manager	High	Performance and Improvement Manager	Carried out annually	
Data				
Ensure adequate audit trails are retained to evidence the reported performance that is uploaded into the performance management system	Medium	Performance and Improvement Team	On-going	
Ensure all new local performance indicators have robust guidance and formulas for everyone to understand and implement	Medium	Performance and Improvement Team	On-going	