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Data Quality Policy

#### Policy Statement

##### The University of Chichester (“University”) is committed to high standards of data quality. Every care will be taken to ensure that the data and information used to support decision making is accurate, valid, reliable, timely, relevant and complete in line with the corporate data quality policy. This policy defines the University’s approach to data quality.

1.2 The University sees data as a significant enabler in the delivery of its strategy and is therefore committed to the highest standards of data quality and to ensuring the accuracy, accessibility and completeness of all data as far as is reasonably practicable.

1.3 The University recognises the obligations it has to manage data in accordance with the UK General Data Protection Regulation and UK Data Protection Act 2018 (Data Protection Legislation) as set out in the University’s Privacy Standard and Freedom of Information Act (2000).

1.4 The University‘s approach to data quality ensures it meets the ‘Terms and Conditions of Funding for Higher Education Institutions’ between the Office for Students and the University; and the ‘Terms and Conditions of Research England Grant’ between Research England and the University.

2. **Purpose**

2.1 The purpose of this policy is:

###### 2.1.1 to have in place strong arrangements for managing the quality of the data collected and reported used by both the University and external agencies.

#### 2.2. Specifically, the University needs to ensure its data quality so that it can:

* Provide effective and efficient services to students, staff and other stakeholders;
* Provide a tool for informing, engaging and empowering students, families and educators.
* Produce accurate, accessible and comprehensive management information on which timely, informed decisions can be made to inform the future of the University;
* Monitor and review activities and operations;
* Utilise resources efficiently in order to provide value for money;
* Produce accurate returns to ensure accurate funding allocations, and to demonstrate accountability to public and private funders.

**3. Scope**

3.1 The scope of this policy includes data held in University-wide systems, and any data collected from these systems and used for internal or external reporting.

3.2 Data which is collected or used in the course of academic research by staff and students is out of scope of this policy.

**4. Data Quality Characteristics**

4.1 Good data quality is defined in the Audit Commission Report[[1]](#footnote-1) by six characteristics:

 4.1.1 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.

 4.1.2 Validity

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

 4.1.3 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.

 4.1.4 Timeliness

* Data should be collected and recorded as quickly as possible after the event or activity.
* Data should remain available for the intended use within a reasonable or agreed time period.

 4.1.5 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.
* Quality assurance and feedback processes are needed to ensure the quality of such data.

 4.1.6 Completeness

* Data should be complete.
* Data should not contain redundant records.

 4.1.7 Compliance

* Data collection, storage and processing must comply with all related statutory and regulatory requirements including by not limited to data protection and data security.

4.2 In addition to the key characteristics above the HESA Code of Practice for HE data collections[[2]](#footnote-2) outlines three principles for data preparations:

 4.2.1 Honesty

* Data should genuinely reflect the characteristics, events and object being reported on.
* Systems to collect, prepare and submit data should be designed to enable this.
* Providers should be transparent in all discussions of the data.

 4.2.2 Impartiality

* Data should be collected, prepared and submitted with impartiality and objectivity.

 4.2.3 Rigour

* Data should be collected, prepared and submitted using repeatable and documented processes that can withstand scrutiny.
* When processes change, records should be kept of previous versions.
* Estimates and assumptions should be defensible, evidence-based and documented, and the effect on the data tested.
* Assumptions and estimates should be reviewed regularly.

**5. Data Quality Requirements**

5.1 Governance and Accountability

 In order to meet the characteristics of good quality data it is important that every member of staff of the University understands that they have a role to play in the improvement of data quality. To ensure that data quality is managed effectively and to secure a culture of data quality throughout the University, it is important to provide a clear assignment of responsibilities:

 5.1.1 The Audit Committee

 The Audit Committee is responsible for reviewing and monitoring the effectiveness of the arrangements for the management and quality assurance of data submitted to the Higher Education Statistics Agency (HESA), Office for Students, Research England, and other funding bodies. The ‘Terms and Conditions of Funding for Higher Education Institutions’ between the Office for Students and the University (“HEI”) sets out the terms and conditions for payment of teaching grants to HEI’s and provides that each Institution must have an audit committee which follows best practice in Higher Education corporate governance.

 The Audit Committee is responsible for preparing a report to the Board of Governors and the Vice Chancellor as the Accountable Officer assuring them about the adequacy and effectiveness of:

 (a) Risk management, control and governance

 (b) Value for money (VFM)

 (c) The management and quality assurance of data.

 The report must be submitted to the Office for Students each year.

 5.1.1 Vice Chancellor’s Group

 The Vice-Chancellor’s Group (VCG) is responsible for reviewing the Data Quality Policy and Data Returns Register on a regular basis. VCG will provide clear direction, visible support and promote data quality and accessibility through appropriate commitment and adequate resourcing to achieve the objectives of this policy.

5.1.2 Vice-Chancellor

 The Vice-Chancellor (VC) is the Accountable Officer of the University. This responsibility cannot be delegated. The VC signs the annual external returns.

5.1.3 Chief Operating Officer

 The Chief Operating Officer (COO) has overall responsibility for reviewing and reporting on compliance with the data quality policy and procedures and liaising with the appropriate staff members to rectify any non-compliance; developing the performance management framework to incorporate data quality and promoting the importance of data quality and accessibility throughout the University. The COO reports on relevant areas of the University’s Risk Register to the VCG.

5.1.4 Head of Planning

 The Head of Planning provides governance and oversight of the University’s data quality with regard to external statutory returns. The Head of Planning escalates data quality and assurance issues to the COO with clear recommendations for action. The Head of Planning produces an annual report for Audit Committee on issues relating to data quality with regard to external statutory returns.

5.1.5 Academic Registrar

 The Academic Registrar (AR) has overall responsibility for the quality and accessibility of student data and for ensuring that approved (via established processes) curriculum data structures are also correctly represented within the University’s core systems infrastructure. The AR has overall responsibility for the accuracy and completeness of student data held within the student record system.

5.1.6 Director of Quality and Standards

 The Director of Quality and Standards (DQS) and the AR have overall responsibility for the responsibility for the quality and accessibility of curriculum data respectively.

5.1.7 Chief Human Resources Officer

 The Chief Human Resources Officer (CHRO) has overall responsibility for the quality and accessibility of staff data held within the HR systems and broadly within the University.

5.1.8 Director of Finance

 The Director of Finance has overall responsibility for the data quality and accessibility of financial data held within the finance system and broadly within the University.

5.1.9 University Secretary

 The University Secretary, in liaison with the COO, will maintain the Data Return Register and update the Data Quality Policy.

5.1.10 Head of ICT Strategy and Architecture

 The Head of ICT Strategy and Architecture has the overall responsibility to ensure that data is held in a secure and accessible environment, as well as providing advice, guidance and training. This Policy is complementary to the University’s Electronic Information Security Policy.

5.1.11 Senior Management Team

 The Senior Management Team (SMT) are comprised of the Directors of Academic Institutes and Senior Heads of Academic Departments and Directors and Senior Heads of Professional Services, as determined by the VCG. The SMT are responsible for promoting a culture of high-quality data and for ensuring that the academic community provide key data in a timely manner where required.

5.1.12 All Professional Services Departments

 Professional Services departments are responsible for promoting a culture of high quality data and for ensuring that systems are in place to collect and report data.

5.1.13 All Staff

 It is the responsibility of all staff who input, store, retrieve or otherwise manage data to ensure that it is of the highest quality. It is the responsibility of all staff to abide by the seven characteristics of good quality data.

5.2 Policies and Procedures

 5.2.1 Each data owner will document its key data requirements and assurance arrangements including the stages that will be undertaken to verify data inputs and review the quality of data output/reports. The job role identified for checking each stage and the method adopted will be captured.

 5.2.2 The data owner role is primarily performed by the leads of functions of services (Finance / Academic Registry / Academic Quality & Standards and HR). The data owners take a governance role ensuring data within the function/service is fit for both operational and strategic use.

 5.2.3 Department managers should ensure that all policies and procedures are adopted and embedded within working processes and that compliance is achieved.

5.3 Systems and Processes

 5.3.1 The process owner will provide guidelines for all processes supporting key data requirements as defined by the University. Staff will be trained to enable guidelines to be followed consistently across the University. Wherever possible data will be collected and recorded once only, without the need for multiple systems. Data collection systems will be designed to have internal validation checking facilities to ensure data is complete, consistent, accurate and internally validated.

 5.3.2 The process owner is responsible for the management of the process within their function, service and/or specialist area.

 5.3.3 All systems will be electronic and automated wherever possible to reduce the risk of manual error, except where there is a specific need to collect, process and store original documents.

 5.3.4 There should be clear strategies for data storage and archiving from systems, with retrieval and security appropriate to an evaluation of present value and future use.

5.4 Data Security

 5.4.1 The University’s digital environment will be designed to provide appropriate security arrangements to ensure that data is protected from unauthorised access from outside the University and to ensure appropriate levels of access to data by individual staff and students.

5.5 Staff Development

 5.5.1 Directors, Heads and managers will ensure that there is a minimum of two members of staff who are capable of fulfilling the necessary responsibilities for data quality and external data returns in their areas.

 5.5.2 Directors, Heads and managers will ensure that all policies, procedures and guidelines are communicated effectively to relevant staff, including policies on security and data protection as part of the wider consideration of data quality.

5.5.3 All members of staff accessing, inputting and amending data on University-wide systems will be expected to have the appropriate knowledge, competencies and capacity to carry out the activity and preserve data quality.

**6. Risks**

The University Risk Register recognises risks associated with the inability to assure the data contained within its returns. A failure in data quality can lead to significant risks relating to the delivery of the Strategic Plan, the impact on the University’s reputation and detrimental financial impact.

 6.1 Lack of clarity on policy and procedures, and poor access to the necessary guidance on their interpretation, can lead to inconsistent or inappropriate data recording practice.

 6.2 Reliance on the existence of written policies is not enough to ensure their adoption in practice; the scope and impact of policies and other corporate requirements must be communicated widely.

 6.3 All systems and processes supporting key data requirements must be reviewed regularly to ensure that data is collected according to the relevant policies and definitions in order that data remains fit for purpose.

 6.4 There may be a perception that achieving high data quality is not an important part of a person’s job role. A data quality culture must be embedded into the University at all levels.

 6.5 Key risks relating to data are as follows:

* Processing of inaccurate data breaches the principles of the Data Protection Legislation.
* Mandatory conditions of grant could be breached.
* Data could give misleading external and internal impressions of the University’s performance in teaching and research.
* Poor data could result in inappropriate decision-making across the University.
* Poor data could result in reputational damage in areas such as student recruitment and access, and student records.
* Poor data could lead to inadequate reporting to sponsors of research, resulting in financial penalties from funders or, depending upon the extent of the problem, reputational damage and diminished funding for research.
* Inaccurate data could lead to under-funding.
* Inaccurate data could lead to over-funding with subsequent claw-back of overpaid funds which, if significant, could impact adversely on the University's financial health.
* Inaccurate data could lead to reduced future funding (holdback) thereby undermining the cash flow forecasts and adversely affecting financial health.
* The University fails to ensure appropriate data quality on its risk register.

**7. Evaluation/Monitoring/Measurement of Data Quality**

7.1 The University will:

7.1 Ensure a framework is in place for monitoring and review of data quality and to address the results of data quality reviews.

7.2 Ensure that it adequately manages risk associated with data quality.

7.3 Ensure that data is accessible and visible with appropriate reporting tools.

7.4 Formally report on data quality as follows:

 7.4.1 Compliance with the data quality policy and procedures will be reported by the Chief Operating Officer to the Vice-Chancellor’s Group.

7.4.2 Outcomes of internal and external audit reviews will be shared with relevant groups and reported to the Vice-Chancellor’s Group and the Audit Committee.

7.4.3 Procedures for data capture, processing, accessibility and storage will be reviewed and updated regularly by the Data Set Owner, normally annually. These procedures will include specific arrangements for ensuring data quality at the point of data capture.

7.4.4 Compliance with this policy will be reviewed and reported through internal assurance audits.

1. Improving Information to support decision making-making: standards for better quality data (Audit Commission November 2007) [↑](#footnote-ref-1)
2. Code of practice for higher education data collections (HESA) [↑](#footnote-ref-2)