

# Data Quality Policy

1 April 2019

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## 1. Policy purpose

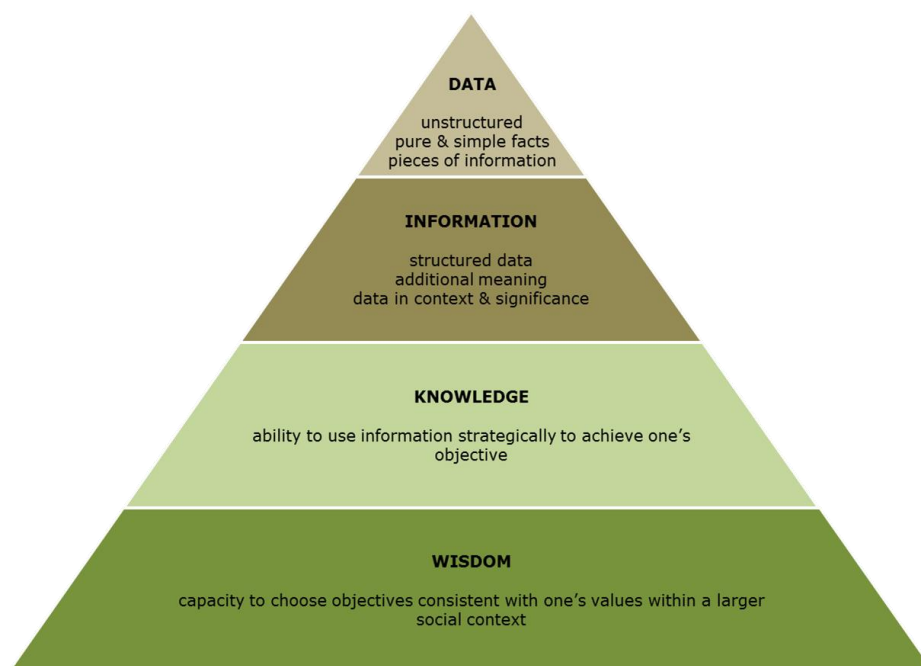
- 1.1. The West Suffolk Data Quality Policy sets out a clear framework for maintaining high levels of data quality across all of the council's activities and processes.
- 1.2. The policy supports the council's vision for the use of information i.e.

"To use information to its maximum potential in West Suffolk in order to improve services and create better outcomes for our residents, customers, visitors, businesses, partners and communities."

## 2. Scope

- 2.1. The policy relates to all information which can be held as electronic data or physical records.
- 2.2. It covers the following ways of handling information by West Suffolk Council:
  - collection
  - use
  - sharing
  - storage
  - presentation
- 2.3. The policy applies to all staff, councillors and contractors accessing West Suffolk's information systems. Each service area will wish to apply this corporate policy specifically to their operations and systems.
- 2.4. The policy does not cover the following, which are addressed through other policies or frameworks:
  - Information security
  - Information / Data sharing
  - Records management, and
  - Ambitions for our use of data and information in the future

2.5. The following definitions are used for the purpose of this policy:



Source: "What is information?", Robert Logan, 2010

### 3. Wider context

3.1. The Data Quality Policy is set in the context of the following legislation and guidance:

General Data Protection Regulation 2018 (EU)	Personal information must be handled and stored in a confidential manner
The Human Rights Act 2000	Everyone has the right to respect for their private and family life, home and correspondence.
The Crime and Disorder Act 1998	The Council can disclose information for the purposes of preventing crime and disorder.
Criminal Procedure and Investigations Act 1996	Council can collect and use information (including covert information) as part of criminal investigations which must be properly retained and may be subject to disclosure.
Freedom of Information Act 2000	Public authorities, if requested, must disclose information that they hold.
The Children Act 1989, 2004 Children's Trusts Guidance	Local Authorities and other key bodies must co-operate to improve the well-being of children in the local area.
Localism Act 2011	Highlights the importance of transparency and accountability of public bodies and raw data.

Local Government Transparency Code	All local authorities must publish the datasets required by the code, in some cases in prescribed formats
The Re-use of Public Sector Information Regulations 2015 (PSI)	Encourages the reuse of public sector information by third parties for purposes other than the initial public task it was produced for. Governs what and how information has to be made available for re-use.

- 3.2. West Suffolk Council is a member of the Suffolk Information Governance Board, and this policy seeks to align our data quality practice to other partners within the group, taking account of specific local and organisational circumstances where appropriate.
- 3.3. Where we work in partnership with other organisations on work involving data and information, we will apply the principles of this policy, also taking account of our partners' data quality policies in order to agree on appropriate common standards and frameworks.

## 4. The importance of good data quality

- 4.1. The General Data Protection Regulations 2018 principles state that personal data shall be: "accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay."
- 4.2. The availability of complete, accurate, relevant, accessible and timely data is important in supporting decision-making, planning, resource allocation, accountability, and the delivery of service outcomes and priorities; for example:

Strategic / planning	High quality data and information is used to plan the council's vision and goals and informs the decisions that underpin everything the organisation does.
Financial planning	Financial data must be reliable to enable the council to set budgets and forecasts to support service planning.
Service planning	Accurate data about the volume and type of services delivered and activities undertaken is essential to ensure appropriate allocation of resources and future service delivery.
Performance management	Accurate data enables the identification and resolution of any shortfalls against standards and targets.

Service improvement	Accurate data enables the analysis of service provision against user needs and overall efficiency and effectiveness.
Customer support	Accurate data enables the delivery of relevant and timely services and ensures that the customer and other parties involved can be kept informed where appropriate.
Efficient administration	Data needs to be provided to an appropriate standard and in such a way that the full range of stakeholders, partners and agencies can access the information they need easily and quickly.
Adherence with audit processes	Data needs to be available for timely, reliable and accurate reporting to support the council's internal and external audit regimes.
Accountability, Transparency and Open Data	Good quality data is essential in delivering the council's transparency and open data agenda.

- 4.3. Data quality is particularly important in partnership working and integrated service delivery, an increasingly important aspect of the council's work. We need to be clear that the quality of the data from the two (or more) organisations who are working together is consistent in order to ensure an accurate and shared understanding of the task in hand.
- 4.4. The key risks associated with poor data quality include
- decisions are based on inaccurate or out of date information
  - customers are not given the service for which they are eligible
  - at risk individuals are not identified
  - opportunities for integration and partnership working cannot be taken
  - poor performance is not identified and addressed
  - published information is misleading
  - inaccuracies in base data result in financial error and loss
  - inaccuracies in externally reported data result in funding discrepancies
  - good performance is not recognised and rewarded;
  - poor use of resource
  - policies are ill-founded and impacts are not properly assessed, and
  - improvement opportunities are not identified and monitored.
- 4.5. Poor data quality can have a significant impact on the council's political, legal, reputational, professional and financial position.
- 4.6. The West Suffolk Information Framework sets out our overall direction of travel regarding use of data and information at West Suffolk Council. The plans set out in this document recognise that data quality is key to quality decision making. Reviewing accuracy of our data is an ongoing activity with the aim of further improving the understanding of the quality of available data, both by us and our partners.

## 5. What makes for good quality data and information?

5.1. There are six aspects of good quality data, as defined by the Ministry of Housing, Communities and Local Government:

Accuracy	Data should be sufficiently accurate for its intended purposes and captured once only, as close to the point of activity as possible. Sometimes, accuracy must be weighed against timeliness, cost and effort of collection. Where compromises are made on accuracy, limitations must be clear to users.
Validity	Data should be recorded and used in compliance with relevant requirements, rules and definitions, ensuring consistency with similar organisations. In the absence of actual data, proxy data may be used, although consideration must be given to how well this data is able to satisfy the intended purpose.
Reliability	Whether using manual or computer based systems or a combination, data should be collected using stable and consistent methods, ensuring that when used for comparison or to monitor progress over time, variations in collection processes do not impact on performance against targets.
Timeliness	Data should be available frequently and promptly enough, and as soon as is reasonable after the event or activity, for it to be of value to decision making and service delivery.
Relevance	Data captured should be relevant to the purposes for which it is intended. It should be defined, collected and analysed with its intended use and audience in mind.
Completeness	Data requirements and collection processes should be clearly specified based on the needs of the organisation. Missing, incomplete or invalid records provide an indication of data quality and can also point to problems in the recording of data.

## 5.2. Checklist for applying the principles of good data quality in practice:

### Timeframe

- Is the timeframe covered by the data clear?
- Has there been a change in policy since the data was collected or are the circumstances the same?
- When comparing datasets – are they for the same year?

### Scope

- Is the scope of the dataset known and stated?
- For example, when looking at demand for a service in West Suffolk, is data only taken from Suffolk sources? What about neighbouring areas' data?

### Collection methodology

- Is it clear how the data was obtained?
- In a survey, for example, were respondents able to tick more than one box, or just one?
- When comparing datasets, were the two methodologies the same (e.g. self-reported issues vs collected by an agent?)

### Source

- Is the source of the data known and clearly stated?
- Is it a reliable and ethical source, with no bias?
- When comparing datasets, is the source the same?

### Metadata

- Are metadata available and clearly communicated?
- Do they give access to the raw data so that further analysis can be done?

### Limitations

- Are the limitations of the data clearly presented when used in a report?

### Validation

- Has data been validated through cross-checks with, for example previous / historical data, other staff members, other sources or against source material, where available?



## 6. Achieving good data quality in West Suffolk

6.1. The council holds a wide range of information for a whole variety of purposes. This policy does not provide detailed guidance for specific data items or individual areas of application. It concentrates instead on general principles of completeness, accuracy, ongoing validity, timeliness, consistency of definitions and compatibility of data items.

The council's vision for data quality is:

*"We are committed to the collection and use of high quality data which are available at the right time, at the right costs and can be relied upon for informed decision making and all aspects of financial and performance management and service delivery."*

6.2. In order to achieve high data quality, the council will ensure that:

Governance and leadership	<ul style="list-style-type: none"> <li>All staff and councillors are aware of their responsibilities relating to data quality through inductions and, where appropriate, job descriptions. These are detailed in the next section of this document</li> </ul>
Systems and processes	<ul style="list-style-type: none"> <li>Data is stored, used and shared in accordance with the law, including those for data protection and freedom of information.</li> <li>All data collection, analysis and reporting processes by the council will be covered by clear procedures, which are easily available to all relevant staff, and regularly reviewed and updated.</li> <li>Correction of data will be done under the authority of the relevant Information Asset Owner (IAO).</li> <li>Data Quality is a core component when specifying / procuring IT Systems.</li> <li>We work constructively with partners and external organisations to provide assurance of data quality.</li> </ul>
Skills	<ul style="list-style-type: none"> <li>All staff are aware of the legal and statutory requirements as well as the importance of good data quality and their own contribution to it.</li> <li>All staff receive appropriate training in relation to data quality aspects of their work.</li> </ul>

## 7. Responsibility and accountability for data quality

- 7.1. Overall responsibility for maintaining accurate and complete data and information lies with the Senior Information Risk Owner for the council.
- 7.2. In general, data quality is the shared responsibility of all:
- Information providers are the source of the data and so are the starting point for creating good data
  - Information recipients have responsibility to maintain accurate data within their systems and ensure its integrity in their processes
- 7.3. Specifically, the roles and responsibilities for staff in helping to deliver data quality are as follows:

All Staff	Data quality is an integral part of any data system or data process that exists within the council. All staff are in contact at some point with a form of information system, whether paper or electronic. As a result, all staff are responsible for maintaining data quality.
All Service Managers	Accountable for the data quality within their service areas and responsible to liaise with the appropriate managers / officers / IAOs to rectify any non-compliance.
IAOs	On a day to day operational level, IAOs should monitor the quality of data and log and report any issues to their Service Managers
Information Governance Working Group	Responsible for drafting and amending this policy. Inform of changes in Government legislation relevant to this Policy. Share best practice around Data Quality. Represent the council at the Information Governance Board.
Internal Audit	To provide advice and guidance in relation to data quality. Monitoring the effectiveness of data quality through internal audits and reporting, by exception, any weakness identified in arrangements, as per existing reporting protocols. Taking a lead role in terms of the results of NFI (National Fraud Initiative) data review arrangements (which identify potential errors in recording as well as potential fraud). Reporting on the outcome of audit work to the Performance and Audit Scrutiny Committees.
External Audit	To discuss issues, share good practice and review approaches in relation to data quality. To assess and form a judgement on the authority's performance against data quality key lines of enquiry as part of the Value for Money conclusion.