



UNIVERSITY OF  
WOLVERHAMPTON

# DATA QUALITY POLICY

DATA  
QUALITY

USING DATA TO PUT  
STUDENTS FIRST



**THE UNIVERSITY OF OPPORTUNITY**



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# INTRODUCTION

The data landscape of higher education has changed with increasing demand on data for management decision making, student choice and submission of external returns.



The University recognises the obligations it has to manage data in accordance with the Freedom of Information Act (2000) and the General Data Protection Regulations which replaced the Data Protection Act (1998) in May 2018. In addition, the University is aware of its responsibility regarding data accuracy and returns as outlined in the HEFCE Memorandum of Assurance.

The Audit Commission Report 2007, which provided guidance on the principles of data management for public bodies, "[Improving information to support decision making: standards for better quality data](#)" stated:

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Good quality data are the essential ingredient for reliable performance and financial information. The data must be fit for purpose, representing in an accurate and timely manner an organisation's activity.

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Given the work on various data quality reviews of the Audit Commission over a ten year period and despite changes in technology underpinning data collection, the principles in the Standards still remain relevant. They still give public bodies a framework to enable them to improve themselves, and keep the need for external assurance in perspective.<sup>1</sup>

The Higher Education Statistical Agency (HESA) "[Code of Practice for HE data collections](#)" stated:

Data submitted by higher education providers to HESA and the UK HE funding bodies plays an essential role in understanding and supporting higher education in the UK.

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.

<sup>1</sup> Data Quality Matters: Learning from Audit Commission work on data quality in local public services' (Audit Commission February 2015)

# PURPOSE

The purpose of this policy is to have in place strong arrangements for managing the quality of the data collected and reported used by both the University and external agencies.



The University needs timely, accurate and reliable data in order to manage activities and meet internal and external requirements to demonstrate accountability through accurate reporting. The University regards data as an asset. This policy defines the University's approach to data quality.

The University needs to ensure its data quality so that it can:

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- 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 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 external returns to ensure accurate funding allocations, and to demonstrate accountability to public and private funders.
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# SCOPE

This policy covers all data that is held in University-wide systems, and any data that is collected from those systems and used for internal or external reporting.

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

Data is defined in the Audit Commission Report<sup>2</sup> (page 4) as numbers, words or images that have yet to be organised or analysed to answer a specific question. This can be further expanded to include: graphics, sound and video<sup>3</sup> ([HEDIIP data toolkit](#)). Information is data in context.

Good data quality is defined in the Audit Commission Report by six characteristics:

### 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.

### 2. VALIDITY

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

### 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. 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.

### 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.

### 6. COMPLETENESS

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

A seventh data characteristic has been added to reflect the importance of regulations and legal compliance which includes UK Visas and Immigration (UKVI) rules.

### 7. COMPLIANCE

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

Within this policy the term 'data quality' refers to the seven key characteristics as defined above.

In addition to the key characteristics above the HESA Code of practice for HE data collections<sup>4</sup> outlines three principles for data preparations:

#### 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.

#### IMPARTIALITY

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

#### 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.

<sup>2</sup>Improving Information to support decision-making: standards for better quality data (Audit Commission November 2007)

<sup>3</sup>Higher Education Data & Information Improvement Programme (HEDIIP) Data Capability Toolkit

<sup>4</sup>Code of practice for higher education data collections (HESA)

# DATA QUALITY REQUIREMENTS

## 1. GOVERNANCE AND ACCOUNTABILITY

In order to meet the afore mentioned characteristics of good data quality 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.

Certain University committees and officers have a particular responsibility for the active management of data. These are set out below:

#### **CORPORATE MANAGEMENT TEAM**

The Corporate Management Team (CMT) is responsible for reviewing this policy on a bi-annual basis. CMT 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.

#### **INFORMATION GOVERNANCE COMMITTEE**

The Information Governance Committee provides oversight of the University's Information Governance Framework. The Committee reports on relevant areas of the Corporate Risk Register to CMT.

#### **EXTERNAL RETURNS GROUP**

The External Returns Group provides governance and oversight of the University's data quality with regard to external statutory returns.

The Group escalates data quality and assurance issues to the Information Governance Committee with clear recommendations for action.

The Group produces an annual report for Audit Committee on issues relating to data quality with regard to external statutory returns.

#### **VICE-CHANCELLOR**

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

#### **ACADEMIC REGISTRAR**

The Academic Registrar has overall responsibility for the quality and accessibility of student and curriculum data. The Academic Registrar has overall responsibility for the accuracy and completeness of student data held within the student record system.

#### **DIRECTOR OF HUMAN RESOURCES**

The Director of Human Resources has overall responsibility for the quality and accessibility of staff data held with HR system and broadly within the University.

#### **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.

#### **DEANS**

Deans are responsible for promoting a culture of high data quality and for ensuring that the academic community provide key data in a timely manner where required.

#### **DIRECTOR OF STRATEGIC PLANNING AND PERFORMANCE**

The Director of Strategic Planning and Performance has overall responsibility for reviewing and reporting on compliance with the data quality policy and procedures and liaising with the appropriate officers 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.

#### **DIRECTOR OF INFORMATION TECHNOLOGY**

The Director of Information Technology has the overall responsibility to ensure that data is held in a secure and accessible environment and promoting a data quality and security, providing advice, guidance and training. This Policy is complementary to the [University's Information Security Policy 2015](#).

#### **ALL PROFESSIONAL SERVICE DEPARTMENTS**

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

#### **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 key characteristics of good quality data.

<sup>2</sup>Improving Information to support decision-making: standards for better quality data (Audit Commission November 2007)

<sup>3</sup>Higher Education Data & Information Improvement Programme (HEDIIP) Data Capability Toolkit

<sup>4</sup>Code of practice for higher education data collections (HESA)

# DATA QUALITY REQUIREMENTS

## 2. POLICIES AND PROCEDURES

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.

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

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

## 3. SYSTEMS AND PROCESSES

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.

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

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.

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.



## 4. DATA SECURITY

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. STAFF DEVELOPMENT

Deans, Directors 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.

Deans, Directors 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.

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.

# RISKS

In higher education, with the wide range of activities undertaken, risks are much wider than financial, often around reputation; these are typically more difficult to quantify than those that have a direct financial impact. This is particularly true for data, where outputs are produced after much processing of raw inputs.

The University Risk Register recognises the 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 strategy, the impact on University's reputation and detrimental financial impact.

Risks associated with the enactment of this policy include:

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.
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.
3. All systems and processes supporting key data requirements must be reviewed regularly to ensure that data are collected according to the relevant policies and definitions in order that data remains fit for purpose.
4. A common obstacle to achieving consistently high data quality is the perception that this is not an important part of a person's job or beneficial to their role. A quality data culture must be embedded into the University at all levels.



# EVALUATION/ MONITORING/ MEASUREMENT OF DATA QUALITY

The University will:

- ensure a framework is in place for monitoring and review of data quality and to address the results of data quality reviews
- ensure that it adequately manages risk associated with data quality
- ensure that data is accessible and visible with appropriate reporting tools
- formally report on data quality as follows:
  - Compliance with the data quality policy and procedures will be reported by External Returns Group to Corporate Management Team
  - Outcomes of internal and external audit reviews will be shared with relevant groups and reported to Corporate Management Team
  - 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.
  - Compliance with this policy will be reviewed and reported through internal assurance audits.

# REFERENCES

- [Improving information to support decision-making: standards for better quality data](#) (Audit Commission November 2007)
- [Data Quality Matters: Learning from Audit Commission work on data quality in local public services'](#) (Audit Commission February 2015)
- [Code of practice for higher education data collections](#) (HESA)
- [Collection Governance: Code of Practice](#) (HESA)
- Higher Education Data & Information Improvement Programme (HEDIIP) [Data Capability Toolkit](#)



# DATA POLICY REFERENCES:

- [University of Manchester](#) (November 2013)
- [University of Salford Manchester](#) (December 2014)
- University of Kent: [Corporate standards for data quality and the collation of data for external presentation](#) (November 2015)
- University of Oxford: [Data Quality](#)
- [Durham County Council](#) (January 2017)

# SUPPORTING STRATEGIES AND POLICIES:

- University of Wolverhampton [Information Security Policy 2015](#)
- [Policies and Regulations](#)



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