Data Assurance Policy

	Core Documentation Cover Page				
	Data Assurance Policy				
Version number	**Dates produced and approved (include committee)**	**Reason for production/ revision**	**Author**	**Location(s)**	**Proposed next review date and approval required**
V1.0	Feb 2016 SMT	To ensure that an annual process of assuring data quality takes place at the UCO.	Vice-Principal (Education)	All master versions will be held in: J:\0 Quality Team - Core Documentation Intranet	Feb 2018
V2.0	Jul 2017 PRAG Chair	Administrative Amendments to update institution name change from British School of Osteopathy to University College of Osteopathy and to update committee and staff role titles.	Vice-Principal (Education)	All master versions will be held in: J:\0 Quality Team - Core Documentation Intranet	Feb 2018
V3.0	May 2018 PRAG Chair	Administrative Amendments to reflect title changes (i.e. from Principal to Vice-Chancellor, etc.)	Deputy Vice-Chancellor (Education)	All master versions will be held in: J:\0 Quality Team - Core Documentation Intranet	Feb 2018
V4.0	Sep 2018 SMT	Major Amendments to reflect title of regulatory body, addition of Data Assurance Form, amendments to Statutory Return Form.	Deputy Vice-Chancellor (Education)	All master versions will be held in: J:\0 Quality Team - Core Documentation Website	Sep 2020
V5.0	Aug 2021 SMT	Major Amendments to align to and reflect Office for Students statutory conditions; to to reflect the Data Quality Dimensions defined by the Data Management Association (DMA); update Data Assurance Group membership and remit.	Finance Director	All master versions will be held in: J:\0 Quality Team - Core Documentation Website	Aug 2024

Equality Impact	
Positive equality impact (i.e. the policy/procedure/guideline significantly reduces inequalities)	
Neutral equality impact (i.e. no significant effect)	X
Negative equality impact (i.e. increasing inequalities)	

If you have any feedback or suggestions for enhancing this policy, please email your comments to: quality@uco.ac.uk

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CONTENTS

1. CONTEXT

1.1 All public bodies need timely, accurate and reliable data in order to manage their activities and also to account for their performance through accurate reporting.

1.2 The University College of Osteopathy (UCO) needs to ensure its data assurance so that it can:

a) Provide effective and efficient services to its students, staff and other stakeholders.

b) Produce accurate and comprehensive management information on which timely, informed decisions are made to inform the future of the UCO.

c) Monitor and review its activities and performance.

d) Produce accurate external returns to ensure accurate funding allocations and account for performance as required.

e) Meet conditions of registration published by the Office for Students https://www.officeforstudents.org.uk/advice-and-guidance/regulation/conditions-of-registration/initial-and-general-ongoing-conditions-of-registration/ and the requirements of the Information Commissioners Office[1].

2. SCOPE

2.1 The scope of this policy includes data held in the UCO on all information management systems and any data collected from these systems which is re-presented or manipulated to inform analysis and reporting.

2.2 This policy will ensure an annual process of assuring data quality at the UCO takes place.

3. RESPONSIBILITY FOR DATA ASSURANCE AND DATA QUALITY

3.1 The UCO is a registered provider with the Office for Students (OfS) and must comply with ongoing conditions. This includes compliance with general ongoing conditions of registration set out in the regulatory framework as well as any specific ongoing conditions applied to the UCO.

3.2 Each OfS condition sets out a minimum level or baseline, that the UCO must achieve and demonstrate to remain registered with the OfS. The OfS monitors the UCO in relation to its conditions of registration. The regulatory framework explains how the OfS performs its monitoring and intervention functions including the collection of data from providers.

3.3 The conditions of registration state that the responsibility for the quality and accuracy of data rests with the HEI and that the OfS "monitors the reasonableness of data and undertakes verification, validation and reconciliation work between HESA data and other datasets" and may undertake data audits to assess "the strength of institutional systems and controls as well as assessing the accuracy of the data submissions".

3.4 Although ultimate responsibility for data assurance lies with the Board of Directors it is an integral part of the role of all members of staff to ensure that they follow the principles of this

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[1] https://ico.org.uk/

policy in order to maximise the accuracy, timeliness and assurance of data collected and recorded, analysed and reported.

3.5 Compliance with the code of practice for higher education data collections[2] published by HESA is a condition of funding for all institutions. The UCO is required to confirm it complies with this code of practice.

4. RISK

4.1 Key risks relating to data have been identified are as follows:

    a) Data could give misleading external and internal impressions of UCOs performance;

    b) Use of data by those unauthorised/unqualified to do so may result in inaccurate reporting.

    c) Poor data could result in inappropriate decision-making by management across the UCO;

    d) Inaccurate data could lead to under-funding;

    e) Inaccurate data could lead to over-funding with subsequent clawback of overpaid funds which, if significant, could impact adversely on the UCO's financial health;

    f) Inaccurate data could lead to reduced future funding (holdback) thereby undermining cash flow forecasts and adversely affecting financial health; and

    g) Inaccurate data could lead to the UCO suffering reputational damage.

4.2 Accordingly, an item related to quality assurance of data appears on the UCO's risk register.

5. DATA QUALITY DIMENSIONS – HOW TO MEASURE YOUR DATA QUALITY

5.1 There are six core data quality dimensions, as defined by the Data Management Association (DAMA):

https://www.gov.uk/government/publications/the-government-data-quality-framework/the-government-data-quality-framework#Data-quality-dimensions :

A) COMPLETENESS

5.2 Data should be complete, all records included, and the most important data is present in those records.

5.3 The data set should contain all records that it should and all essential records are populated.

B) UNIQUENESS

5.4 Data should contain only one record for each entity it represents, and each value should only be stored once.

C) CONSISTENCY

5.5 Consistency describes the degree to which values in a data set do not contradict other values representing the same entity.

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[2] https://www.hesa.ac.uk/innovation/data-landscape/Codes-of-practice/Supply-side

5.6   Data is consistent if it doesn't contradict data in another data set. For example, if the date of birth recorded for the same person in two different data sets is the same.

D) TIMELINESS

5.7   Timeliness describes the degree to which the data is an accurate reflection of the period that they represent, and the data and values are up to date.

5.8   Data is timely if the time lag between collection and availability is appropriate for the intended use.

E) VALIDITY

5.9   Validity describes the degree to which the data is in the range and format expected.

5.10   Valid data is stored in a data set in the appropriate format for the type of data. For example, a date of birth is stored in a date format rather than in plain text.

F) ACCURACY

5.11   Accuracy describes the degree to which the data matches reality.

5.12   Bias in data may impact accuracy. When data is biased it means that it is not representative of the entire population. Bias should be accounted for in measurements if possible, and data bias should be communicated to users.

5.13   In a data set, individual records should be measured for accuracy as well as the whole data set.

6. DATA ASSURANCE OBJECTIVES

6.1   The data quality dimensions in Section 5 will be adopted by the UCO. 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.

A) APPROPRIATE RESPONSIBILITY, ACCOUNTABILITY AND AWARENESS

6.2   Every member of staff should recognise the need for good quality data and how they can contribute to it.

6.3   Every member of staff should be aware of their individual responsibilities with regard to data collection, storage, analysis and reporting.

6.4   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 UCO as a whole.

6.5   Every member of staff should report any systematic data quality issues immediately to their line manager who should ensure remedial action is taken.

B) APPROPRIATE POLICIES AND PROCEDURES

6.6   The UCO should define clearly its key data requirements and assurance arrangements.

6.7   Local procedures must exist for all key activities such as major data collection exercises and external returns.

6.8   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.

6.9   Those managers responsible for sign off of data should ensure that all such policies and procedures are adopted and embedded within working processes and that compliance is achieved in their areas.

C) APPROPRIATE SYSTEMS AND PROCESSES

6.10   Clear systems/business processes should exist in which data collection and reporting are an integral part.

6.11   Guidelines for all processes supporting key data requirements as defined by the UCO should exist and be followed consistently across the UCO.

6.12   Data should be collected and recorded once only wherever possible without the need for multiple systems.

6.13   Data collection systems should contain internal validation to ensure accurate and complete data.

6.14   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.

D) APPROPRIATE SECURITY AND RELIABILITY OF UCO SYSTEMS

6.15   The UCO should have in place appropriate security arrangements to ensure that data are protected from unauthorised access from outside the UCO.

6.16   The UCO should ensure that its internal systems are robust and reliable. Any risks should be fully articulated in the departments risk register.

6.17   All systems should have security arrangements in place to ensure appropriate levels of access to data by individual staff and students.

6.18   All staff should be appropriately trained in data protection issues relevant to their role.

E) APPROPRIATE STAFF DEVELOPMENT

6.19   All members of staff and students accessing, inputting and amending data on UCO systems should have the appropriate knowledge and skills to carry out the activity and preserve data quality.

6.20   All policies, procedures and guidelines should be communicated effectively to relevant staff and students.

6.21   Appropriate staff development/training will 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.

7. REPORTING AND REPRESENTATION OF DATA

7.1   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.

7.2 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 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 Vice-Chancellor's Group unless otherwise previously agreed by the Vice-Chancellor.

8. IMPLEMENTING THIS POLICY AND KEY ACTIONS

8.1 This policy will be communicated to all those involved in data quality.

8.2 It is the responsibility of senior managers to ensure that staff who are working with data are aware of this policy and understand how it relates to their work.

8.3 Each area with significant responsibilities for data quality will nominate an individual to sit on the Data Assurance Group (DAG). Members of DAG will include but will not be limited to the managers responsible for data and for major external data returns for the UCO.

8.4 Members are likely to be drawn from:

a) Finance

b) HR

c) Registry

d) Quality

e) Estates

f) Research

g) Clinic

h) ICT

i) Fundraising

j) Student Services

See Table One of Data Returns and the Nominated Manager Responsible.

8.5 The DAG is responsible to the Senior Management Team (SMT) for the implementation of the data quality policy.

8.6 The DAG will:

a) Create a culture of quality through raised awareness of the importance of high quality data.

b) Proactively assess data quality and provide SMT with a full analysis of any issues and recommendations to operational procedures where appropriate.

c) Ensure that all departments fully document any risks related to data quality in their risk registers.

d) Ensure that all reasonable steps are being taken to prevent, detect and rectify any irregularities in the quality and use of data.

e) Ensure that any recommendations by reviewers are considered and acted upon in a timely manner.

f) Put in place an appropriate 'Sign Off' Procedure for all data returns to include regular indications of 'Data Cleansing'.

g) Ensure that all staff involved in collating data have received appropriate training for any data returns

h) Ensure that all departments produce and maintain a set of procedure notes for each regular return/report.

i) Produce an annual report for SMT to recommend to the Audit and Risk Committee to help inform their opinion on data assurance at the UCO.

APPENDIX 1: DATA ASSURANCE REPORT FORM

In line with the Data Assurance Policy each Head of Department shall complete a Data Assurance Report Form to ensure that staff are aware of their individual responsibilities with regard to data collection, storage, analysis and reporting and to highlight the implications of poor quality data in their area in terms of internal and external accountability.

Data Return:	*Title of Data Return / Report*
Responsible Department:	*Title of Department / Team*
Responsible Officer:	*Head of Department / Team*
Description of Data:	*e.g. Number of Staff Trained, Number of Students Graduated, etc.*
Data Collection Procedure (including Individual Responsibilities):	*Describe how the data is collected, inputted and returned to external agencies / internally, identifying particular responsibilities of individual staff members, including any sign off procedures.*
System into which Data is Collated:	*e.g. QL, iTrent, etc. (N/A if not applicable)*
Data Cleansing Procedure:	*Describe how the data is cleansed and checked for to ensure is of 'good quality', i.e. is accurate, valid, reliable, relevant, complete and timely.*
Implications of Poor Data Quality Internally & Externally:	*Describe the implications should poor quality data relating to the data return / report.*
Enhancements to Data Collection / Cleansing Procedures (including Individual Responsibilities):	*Identify any enhancements that could be made to the current data collection or cleansing procedures that could improve data assurance.*
Author:	*Name & Role of Author of this Form*
Date Produced:	*DD/MM/YYYY*
DAG Sign Off Date:	*DD/MM/YYYY*

APPENDIX 2: DATA ASSURANCE STATUTORY RETURN FORM

Statutory Return:	
Department:	
Ref. No. (if applicable):	
UCO Deadline:	
Submission Deadline:	
Sign-off Deadline:	

Summary of key outcomes of return
Self-audit of last return (if applicable)
Key changes to guidance
Documentation
Data integrity
Comparison with previous year

APPROVAL

I confirm that the information provided in the attached Statutory Return is accurate, presenting a reasonable view of the return and recommend that the Statutory Return is signed by the Vice-Chancellor.

Collated by:			
Signature		**Date:**	
First Sign-off:			
Signature		**Date:**	
Final Sign-off:			
Signature:		**Date:**	