

Data Quality Policy

April 2019

Last updated	April 2019
Responsible Officer	Risk Management and Performance Manager
Agreed by	Corporate Governance Board
Next update due	April 2023

Data quality policy

Introduction

The purpose of this policy is to define Mole Valley District Council's approach to delivering and improving data quality. The policy will ensure that the authority maintains, uses and reports data that is fully compliant with legislative requirements, and also meets the business and information needs of the Council, residents and stakeholders of Mole Valley.

The policy demonstrates the commitment of the Council to ensure that information is maintained and updated to ensure the greatest level of accuracy and currency achievable.

This policy relates to data in the form of performance and financial information including performance indicators, budget information, risk management information, corporate project information, and procurement information. The policy therefore should be read in conjunction with a range of documents including the Financial Regulations, Risk Management Policy, Project Management guidelines, Procurement guidance, Anti-Fraud and Anti-Corruption Policy, Records Management Policy, Freedom of Information Act Publication Scheme, ICT Security Policy and the Data Protection Policy.

For the purposes of this policy, data is defined as 'objective, factual data, on which policy decisions are based and on which public services are assessed, or which is collected or generated in the course of public service delivery'.

The Policy is supported by guidance notes.

Policy Statement

Mole Valley District Council will:

'Ensure that all data that Mole Valley District Council creates, uses and shares is robust, trustworthy and establishes a sound basis for decision making, service management and public understanding and assurance'.

The necessary support, assistance and commitment of senior management will be provided.

Aims

In support of the Policy Statement, the aims are to:

- Provide Council employees and Members with a framework to ensure sufficient action is being taken to meet the data quality objectives
- Ensure that the Council records, analyses and reports accurate, reliable and consistent performance and contextual data to inform the decision-making process, including data collected from third parties
- Ensure that 'Right First Time' and COUNT (Collect Once Use Numerous Times) principles are embedded in Council practice

- Ensure that effective data ownership and maintenance processes are in place to avoid unnecessary duplication and reduce the risk of errors in recording and reporting
- Ensure that training and regular auditing / data testing processes are in place so that standards are met and maintained and external audit standards and requirements are met
- Ensure that data available to councillors and members of the public conforms to best practice data quality standards
- Provide a clear statement of reassurance for other information owners as a basis for appropriate information sharing and partnership working
- Contribute to minimising the risk of fraud

Objectives

The data quality objectives of the Council are clearly linked to the achievement of corporate priorities and business objectives. They ensure that data is:

- **Accurate** – The data recorded must be sufficiently factual, timely, legible and consistent to meet its intended purpose.
- **Reliable** – data should reflect stable and consistent data collection processes across all collection points and over time. Validation processes should be in place.
- **Timely** – data should be captured as quickly as possible after the event/activity, and reported within a reasonable period.
- **Relevant** – data captured should be relevant for the purpose for which it is collected and used in full compliance with data protection principles. Data that is no longer required or relevant should be destroyed in accordance with Council and legislative disposal and retention policies

Legislative context

All of the Council's data management processes, including data sharing protocols, must comply fully with the data protection principles as set out in Article 5 of the General Data Protection Regulations (GDPR):

1. Processed fairly, lawfully and transparently.
2. Only collected for specified, explicit and legitimate purposes.
3. Adequate, relevant and limited to what is necessary for processing.
4. Accurate and kept up to date with every effort to erase or rectify without delay (where appropriate).
5. Kept in a form such that the data subject can be identified only as long as is necessary for processing.
6. Processed in a manner that ensures appropriate security measures are in place.

The Data Quality Policy is fully compliant with these principles but, when personal data is being processed, will need to be read in conjunction with the Council's Data Protection Policy and ICT Security Policy.

There is an accountability obligation which requires the data controller to be able to demonstrate compliance with all requirements under GDPR. It is, therefore, important to keep records to demonstrate how we are accountable – more information on this can be found in the MVDC [Data Protection Policy](#).

There are a number of specific examples set out in the legislation (GDPR and Data Protection Act 2018) where data sharing may be permitted where it would otherwise be prohibited (for the purposes previously known as the crime and disorder purposes for example), or where data should not be processed where otherwise there would be an obligation to do so (for example where the information is legally privileged). Full details can be found in the Council's [Data Protection Policy](#).

Framework

To enable the objectives to be achieved, the following arrangements are in place:

1. Corporate Ownership and Responsibility for Data Quality

Data quality is the responsibility of everyone in the Council who enters, extracts or analyses data from any of the Council's information systems and records. Everyone should be aware of their responsibilities in this regard.

Some officers have specific responsibilities in relation to data and information management. Where necessary, explicit reference to data quality responsibilities should be stated in job descriptions and objectives and employees should be trained appropriately to carry them out.

In addition:

- All Business Managers are responsible for the quality of data collected, generated and reported by their department. They will act as Information Asset Owners for all of the information entering their service units, leaving their service units, or created, changed or deleted within their service units. They will also act as Data Quality Champions and promote the Data Quality Policy within their service area.
- The Executive Head of Service (People and Projects) is the Senior Information Risk Owner and has lead responsibility for data quality across the organisation.
- The Council's Senior Leadership Team review finance and performance regularly and will act as corporate Data Quality Champions.
- The Cabinet Member for Finance, Performance and Risk will act as lead Member for data quality.
- Scrutiny Committee and Audit Committee scrutinise information presented in reports on a regular basis.
- The Risk Management and Performance Manager has responsibility for ensuring that the Data Quality Policy is up to date and communicated and that regular data quality checks are conducted.
- Data Quality Champions have been appointed within each service unit and will act as a further set of eyes and ears to assist in the identification of gaps in control and the implementation of changes.

When engaged in partnership working, the Council will make their partners aware of their responsibilities for data quality. Services receiving data from partners have a responsibility to verify data received and ensure that any data quality issues identified are addressed with the partner organisation.

2. Accurate Data Collection and Recording

Data collection and recording systems should be fit for purpose in terms of the service business need, reportable performance and target achievement, and informing service development and other strategic processes. A clear and complete audit trail should be maintained.

In terms of performance indicators, data should be recorded against a stated definition and formula and any local performance indicators must be well defined and a methodology for collection of the information established. Regular spot checks of the quality of performance indicator data should be carried out.

The effort needed to collect information should be appropriate and proportionate to its usefulness to the organisation.

Systems which hold or produce management information must be fit for purpose.

Recorded data should be verified and signed off by an appropriate officer.

3. Analysis and Reporting

Management information is analysed continuously to monitor service delivery and is reported in a variety of ways and to a variety of audiences for decision making and transparency purposes.

Analysis of management information must be carried out by individuals who understand the context and purpose for collecting the data.

Reports will be made internally for the purposes of monitoring budgets and performance in services and to support operational decisions.

Members receive finance and performance reports to support political decision making and scrutiny of the Council's performance.

Reporting will also be carried out externally to inform the community of the Council's performance, to celebrate success and explain and plan for improvements. The Council will also publish data externally to meet the requirements relating to the Transparency Code.

4. Monitoring Arrangements for Data Quality

Risk assessments for data systems should be carried out when changes are made or new systems implemented.

Controls should be in place for the extraction, input or amendment of data held in systems.

Within partnership arrangements, data quality checks on partners' information should be carried out.

Policy Review

The Data Quality Policy will be reviewed every four years by the Risk Management and Performance Team and submitted to the Corporate Governance Board for approval.

Approval of minor changes is delegated to the Executive Head of Service (People and Projects).

Data Quality Arrangements: Roles and Responsibilities

Members	<p>All Members</p> <ul style="list-style-type: none"> • Apply principles of data quality in all aspects of their functions/duties • Have a responsibility to challenge data presented to them <p>Cabinet Member for Finance, Performance and Risk</p> <ul style="list-style-type: none"> • Acts as lead Member for data quality 	<p>Scrutiny / Audit Committee:</p> <ul style="list-style-type: none"> • Scrutinise information presented in reports • Provide an appropriate challenge to ensure data quality 	<p>Cabinet:</p> <ul style="list-style-type: none"> • Ensure decisions are made on the basis of good quality data
Staff	<p>The Senior Leadership Team (SLT)</p> <ul style="list-style-type: none"> • Act as corporate Data Quality Champions • The Executive Head of Service (People and Projects) acts as the Senior Information Risk Owner and has lead responsibility for data quality across the organisation <p>Corporate Governance Board</p> <ul style="list-style-type: none"> • Approve the Data Quality Policy every four years 	<p>Business Management Team (BMT)</p> <ul style="list-style-type: none"> • Act as Information Asset Owners for the information entering their service units, leaving their service units, or created, changed or deleted within their service units • Act as Data Quality Champions and promote the Data Quality Policy within their service area • Have a responsibility for the quality of data collected, generated and reported in relation to their service area • The Legal Services Manager acts as the Council's Data Protection Officer in respect of the processing of personal data 	<p>Risk Management and Performance Team (RMPT)</p> <ul style="list-style-type: none"> • Ensure that the Data Quality Policy is up to date and communicated • Conduct regular data quality checks <p>Data Quality Champions</p> <ul style="list-style-type: none"> • Assist in the identification of gaps in control and the implementation of changes <p>All Employees</p> <ul style="list-style-type: none"> • Ensure that all necessary data is provided in an accurate, reliable and timely manner, and is fit for purpose in accordance with the Council's Data Quality Policy