



Information Governance

Data Quality Policy

Document Owner	Chris Twomey (SIRO) Chris.twomey@westlancs.gov.uk
Version	V1.0
Approved	23 June 2021

Purpose

1. The purpose of this policy is to have in place strong arrangements for managing the quality of the data collected and used by both the council and its partners. This policy document sets out the council's approach, ensuring that:
 - a) information is of high quality, accurate, valid, reliable, timely, relevant, and complete in nature
 - b) data quality is fully embedded across all services and is a key consideration in collecting, processing, or using data to support decision making.
2. By achieving high standards of data quality, the council and its partners will:
 - a) have assurance in the information supplied so that there will be confidence in the decision-making processes and strengthen the relationship between the council and partners
 - b) provide and publish data, which is reliable, timely and robust
 - c) be able to respond effectively to service provision and quality of life issues affecting our communities.

Scope

3. This policy document provides an overarching, corporate approach to the management of data quality to support decision making. Service specific policies and procedures will flow from this corporate policy, where relevant and necessary, thereby ensuring that all the corporate standards outlined in this policy are maintained across the council.
4. This policy supports any data collection including personal information such as contact details held within various major systems across the council.
5. This policy applies to managing the quality of data provided from systems:
 - a) Owned and managed by the council e.g. where services are provided directly by West Lancashire Borough Council.
 - b) Co-owned by the council and managed by a third-party delivering services on behalf of West Lancashire Borough Council e.g. a contractor or arm length organisation providing local services.
 - c) Owned and managed by partner agencies where data is supplied to West Lancashire Borough Council.

(Arrangements to secure data quality for (b) will be through inclusion of relevant clauses in procurement contracts and for (c) through data sharing protocols with key partners.)

6. This policy is aimed at officers and members within West Lancashire Borough Council and underlines the importance that the Council places on

data quality. It is a document which is available to all stakeholders and will be published on the Council website accordingly.

Background

7. Government departments, inspectors and regulators require information to meet their responsibilities for making judgments about performance and governance. With the abolition of inspection regimes, including removal of the Audit Commission's data quality assessment and assurance, more emphasis is now placed on local arrangements and self-regulation. The weight attached to published data as the basis for reducing the burden of regulation and awarding freedoms and flexibilities has significantly increased the importance and emphasis on the quality of the data being used.
8. The council's approach to data quality is informed by a set of standards recommended in 'Improving Information to Support Decision Making Standards for Better Quality Data' (Audit Commission) and 'Managing Local Performance: A Toolkit for Data Quality' (Local Government Association).

Characteristics of good data quality

9. *Robust data*: Producing robust data is an integral part of our operational, performance management, and governance arrangements. The council recognises that there are several key characteristics of good quality data. The data which we report and make decisions on should be:
 - a) **Accurate** - Data should be sufficiently accurate for its intended purposes. Accuracy is most likely to be secured if data is captured as close to the point of activity as possible. Data should be captured once only, although it may have multiple uses. The importance of the uses for the data must be balanced with the costs and effort of collection. Where compromises must be made on accuracy, the resulting limitations of the data should be clear.
 - b) **Valid** - Data should be recorded in an agreed format and used in compliance with recognised council and national standards. Where proxy data is used to compensate for an absence of actual data, it must be considered how well this data is able to satisfy the intended purpose.
 - c) **Reliable** - Data should reflect stable and consistent data collection processes across the council.
 - d) **Timely** - Data should be available within a reasonable time period, quickly and frequently enough to support information needs.
 - e) **Relevant** - Data captured should be relevant to the purposes for which it is used. This entails periodic reviews of requirements to reflect changing needs.
 - f) **Complete** - All data should be captured, in accordance with the definitions, or based on the information needs of the council and data collection processes matched to these requirements. Monitoring missing, incomplete, or invalid records can provide an indication of data quality and can also point to problems in the recording of certain data items.

10. *Data quality objectives:* The council's corporate objectives for data quality define a framework of management arrangements which will assure partners and other stakeholders that the quality of our data is reliable and sustainable. The council's corporate data quality objectives are to:
 - a) ensure arrangements for governance, monitoring and review of data are formalised and an organisational culture that values the quality and reliability of data is fostered
 - b) provide a framework of systems, policies and procedures to improve management of data within the organisation and in partnership with others to ensure the highest possible data quality whilst ensuring that resources allocated to data quality are proportionate to the benefit gained
 - c) provide effective training for our staff and members on expectations in terms of the standards of data quality
 - d) ensure that the information processed and used is held securely and confidentially in accordance with the law, including the Data Protection Act and Freedom of Information Act
 - e) ensure that published information is accessible, timely, valid, and accurate.
11. *Data quality standards:* The council is committed to collecting and processing data according to national, or where these are not available, locally defined standards. A formal set of quality requirements will be applied to all data which is used by the council, shared externally, or provided by a third-party organisation. Achieving these standards will satisfy ourselves and our stakeholders that the data is sound and that it can be used with confidence.
12. *Systems and processes:* The council will ensure that appropriate systems are in place for the collection, recording, analysis and reporting of data. The council recognises the importance of these systems operating on a right first-time principle. The council will effectively consult with staff and partners when developing or implementing new information systems.
13. The council will use the principle of 'collect once and use numerous times' (COUNT) to underpin data collection and storage.
14. *Data Security:* The council will ensure that data is stored in a secure environment with appropriate security and system backups for all business-critical systems. The access and use of data should be appropriate to the data user and comply with relevant legislation (such as the Data Protection Act and the Freedom of Information Act). Systems will be regularly tested to ensure processes are secure. Adequate business continuity plans will be developed and maintained.

Partnership Working: Information sharing is crucial to partnership working. It

is essential that we have confidence in shared data or data supplied by third parties. The council will ensure that a formal framework for data sharing with partners is put in place. This includes identifying and complying with all relevant legal, compliance and confidentiality standards. A validation process will be established for all data provided by partners or other third parties.

15. *Data use and reporting:* The council will ensure that data is used appropriately and in the right forum, so that reliable data is at the centre of decision making. Arrangements will be put in place to ensure that data is also used to manage and improve the delivery of services. Reported information will be made available to staff who produce it to reinforce understanding of the way it is used.
16. *Internal control and validation:* The council will ensure that it has effective validation procedures in place to ensure the accuracy of data used. Data returns will be supported by a clear and complete audit trail and subject to service, corporate and internal audit verification checks. Any errors discovered during the audit will be corrected within established timescales and any improvement actions will be acted upon to continuously improve the council's approach to data quality.

Roles & Responsibilities

17. The council is committed to ensuring that it has the right people with the right skills and knowledge to deliver effective services. This policy applies to all staff within West Lancashire Borough Council who have a responsibility for data quality. However, it is recognised that where staff are assigned a specific data quality role, that role should be clearly defined and documented. To ensure that data quality is managed effectively and to secure a culture of data quality throughout the council, it is important to provide a clear assignment of responsibility throughout the council as outlined below:

Role	Areas of Responsibility
Director of Transformation & Resources	Corporate Management lead for data quality, with responsibility for formulation of policy and overall review and audit of arrangements to ensure compliance
Data Protection Officer	Corporate Management lead with responsibility to enforce compliance with the data quality policy in accordance to the Data Protection Act 2018 and UK GDPR.
Heads of	<ul style="list-style-type: none">▪ Ensuring that adequate, safe systems are in place, which hold an acceptable standard of information

Service	<ul style="list-style-type: none"> ▪ Ensuring that the information they provide is accurate, timely and meets relevant guidance ▪ Raising awareness of the data quality policy and implementation throughout the service area ensuring that staff responsible for data are aware of the requirements of the data quality policy.
Information Governance Function	<ul style="list-style-type: none"> ▪ Regularly reviewing and reporting on compliance to the Director of Transformation Services, DPO and via the Information Governance Committee. ▪ Monitoring compliance with the data quality policy and procedures and liaising with the appropriate officers to rectify any non-compliance ▪ Establishing and seeking agreement of a corporate set of indicators that evidence the importance of data quality throughout the council and with partners. ▪ Undertaking review of data accuracy for any medium and high-risk data prior to submission ▪ Carrying out audit checks, establishing systems to validate data quality and reporting back to those who provide data informing the Information Governance Team of any changes to data and/or supporting definitions as they arise.
Systems Teams/ Data Providers	<ul style="list-style-type: none"> ▪ Designated officers with specific responsibility for management of data and/or systems within their service grouping. ▪ Administration of the data system and ensuring that the data in the system is accurate. It is the responsibility of all staff who input, store, retrieve or otherwise manage data to ensure that it is of the highest quality ▪ Liaising with service performance teams in development and ownership of definitions.
Internal Audit/ External Audit	<ul style="list-style-type: none"> ▪ Providing assurance on the effectiveness of data quality, conducted within the audit annual plan ▪ Providing advice and guidance, utilising processes such as DPIA's, to support the establishment of data quality controls for new system developments and providing assurance on the effectiveness of data quality controls in existing systems ▪ Independently test check data linked to the internal audit review programme to provide assurance that it is accurate.
All council staff and Elected Members	<ul style="list-style-type: none"> ▪ Required to adhere to the Data Quality Policy and have a responsibility to ensure that data is handled in a responsible way and that all reasonable efforts are made to ensure the quality of data. ▪ Training and development of staff and an understanding of the importance of data quality for elected members will underpin the achievement of high levels of data quality. Staff will be supported in their responsibility towards capturing quality data. ▪ Data sharing issues with partners will be addressed by staff

	<p>working closely with partners to resolve them. This includes taking reasonable steps in keeping personal data accurate and up to date in line with requirements of the Data Protection Act.</p> <ul style="list-style-type: none"> ▪ The commitment to data quality will be clearly communicated throughout the council to re-enforce the message. Policies, procedures, and guidance will be developed and updated in association with relevant staff. To ensure this policy is embedded, key actions will be developed, monitored, and reviewed.
--	--

Evaluation/Monitoring/Measurement

18. A framework will be implemented to underpin the requirements outlined in this policy for monitoring and review of data quality and to address the results of data quality reviews.
19. Arrangements will be put in place to monitor the quality of data shared between partners whenever new data sharing is required.
20. The council will ensure that it adequately manages risk associated with GDPR data compliance.
21. The council will formally report on data quality as follows:
 - a) services will regularly report issues arising from data quality reviews through departmental management teams or managers
 - b) compliance with the data quality policy and procedures will be reported by the information governance function
 - c) outcomes of internal/external audit reviews will be shared with relevant officer groups and will be regularly reported to the IG Committee, Audit Committee, Corporate Management Team, and Scrutiny Committee. This process will enable the monitoring and review of any previously agreed improvement actions to ensure they have been implemented.
22. Non-compliance to this policy will be reported to the DPO and Corporate Management Team. This will be done on a routine BAU basis. Non-compliance with partners will also be pursued and rectified.
23. The policy is supported by operational procedures and guidance notes.
24. The Data Protection and Impact assessment process will identify data processing and storage arrangements which will be reviewed and updated regularly, alongside the introduction of an annual return for data owners, which will be completed and signed off. The processes will include specific arrangements for ensuring data quality at the point of data capture, during the processing of that data, and appropriate data quality checks before data is released.

25. Service teams will promote policy and procedures and regularly review and report on compliance and be effective in rectifying any non-compliance.
26. Compliance with this policy will be reviewed and reported through routine internal/external audit of the council's systems of internal control and where relevant findings result in a 'limited assurance or no assurance' opinion, details will be reported to the council's Audit and Governance Committee.
27. The council will ensure that arrangements are in place to evaluate the effectiveness and embedding of this policy through:
 - a) regularly reviewing and reporting on compliance with the data quality policy and procedures
 - b) regularly monitoring any actions that support this document.

Review

28. This policy will be formally reviewed at least every three years by the Corporate Management Team (CMT) to ensure that any national or local guidelines, standards or best practice that have been issued and that the council needs to work to, are reflected in a timely manner.

Equality and Diversity

29. West Lancashire Borough Council is committed to promoting equality of opportunity, valuing diversity, and ensuring discrimination, harassment or victimisation is not tolerated. Our policy is to treat people fairly, with respect and dignity. We also comply with the legal requirements of the Equality Act 2010 in relation to age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex, and sexual orientation.