

University of Kent: Corporate Standards for data quality and the collation of data for external presentation

The University needs accurate and reliable information in order to manage its business including:

- delivering an efficient service to staff, students and stakeholders
- providing informative and reliable management information and reporting
- demonstrating public accountability
- supporting Kent's external credibility and reputation, as good quality data and data returns reflect a well-run institution
- ensuring Competition & Markets Authority compliance by giving applicants and students the clear, accurate and timely information that they need so they can make an informed decision about what and where to study
- enabling the Audit Committee to give, as part of its annual opinion, assurance over management and quality assurance of data submitted to the Higher Education Statistics Agency (HESA) and to the Office for Students and other funding bodies.

In order to achieve this outcome, the University requires a culture that demonstrates a high commitment to data quality at a senior level.

These Corporate Standards aim to safeguard the University's position in published information, while at the same time building confidence in data and its robustness for analysis. These standards apply to quantitative as well as qualitative (textural) data held in University-wide systems and submitted externally.

In applying these Corporate Standards, heads of department will need to consider the risk, or the potential future risk, of data in individual returns impacting on the University's reputation or finances. Returns with a high risk will require a higher level of management and scrutiny than those with a low risk.

All users of statistical data held on University systems should be aware of the key principles of data processing contained in [Article 5](#) of the United Kingdom General Data Protection Regulation (UK GDPR), the [Data Protection Policy](#) and the [Records Management Policy](#). Staff responsible for the collection, storing and reporting of data must undertake University data protection training.

Principles of data preparation

Honesty – Data should genuinely reflect the characteristics, events and objects being reported on, to the best of the higher education provider's ability. Systems to collect, prepare and submit data should be designed to enable this. Providers should be transparent in all discussions of the data, and not withhold information that bears on their accuracy or interpretation. HESA, or the relevant funding body, should be informed promptly if errors are found after data has been submitted.

Impartiality – Data should be collected, prepared and submitted with impartiality and objectivity. This process should not ever be influenced by organisational, political, or personal

interests. HE providers should implement controls to ensure that those dealing with data collections are protected from such interests.

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.

Governance and leadership

Council holds ultimate responsibility for data quality assurance and a strategic responsibility for data quality should be part of the formal portfolio of a member of the Executive Group. However, it is the day-to-day responsibility of individual members of staff to ensure that the principles and requirements of these Corporate Standards are followed to maximise the accuracy and timeliness of data returned externally.

External reporting

All external data returns should comply with the requirements of these Corporate Standards.

Data scrutiny and review

Data items should be periodically reviewed to ensure that the data is necessary and that it is collected in the most efficient form.

Wherever possible, data held on University systems should be subject to:

- on-line validation at the point of entry
- verification by the data subject.

All data held on University systems should be scrutinised on an on-going basis for reasonableness, accuracy and fitness for purpose with exception reporting deployed to identify possible data errors or missing values.

Compilers of external returns should pay particular attention to the following:

- completeness of data sets and missing data issues
- time series/data trends, as an aid to understanding context
- critical appraisal of data abnormalities with explanations documented
- the need to consult with other relevant departments and individuals to ensure accuracy and consistency of information being returned.

Documentation

Each external return should be supported by a document setting out a clear, complete and verifiable audit trail that enables confirmation that the methodology employed meets relevant requirements for the external return.

There should be a complete set of procedural notes maintained for each external return enabling the return to be completed by any suitably skilled/trained member of staff. These should be periodically updated to ensure they reflect current practice and requirements.

There should be transparency between summary statistics derived from the data to be reported externally and the summary data set held in internal systems, with a full reconciliation of any differences for each return.

Professional Service Heads should ensure that all such procedures are adopted and embedded within working processes to achieve compliance.

Professional Service Heads are required to maintain a risk-assessed list of external data returns undertaken by their department which will be reported on annually to inform the risk management process.

A Data Returns Checklist should be completed for high risk returns to provide assurance to the relevant Executive Group member and the University that the return has met the requirements of these Corporate Standards.

Independent review

A thorough assessment of data to be returned externally should be undertaken by a senior person not involved in the collation of the return, preferably a Professional Service Head or equivalent.

The relevant Professional Service Head should evaluate summary statistics for each set of data returned externally for:

- reasonableness
- context in terms of summary statistics for previously submitted data.

Help should be solicited from an appropriate office (i.e. Planning and Data Engineering) should the necessary technical skills to undertake this work not be available to a Professional Service Head.

Final review and sign off

Where a Return is deemed high risk either in terms of financial or reputational risk, the Executive Group member responsible for the appropriate Professional Services Department will undertake a high level check for credibility and reasonableness, including review and sign off of a Data Return Checklist, before signing off the data return.

Resilience and backup

Organisational resilience should be delivered through ensuring that each data return can be compiled by at least two competent and fully trained members of staff, preferably each with practical experience of undertaking the return and thereby minimising the exposure to risk in the event of staff unavailability.

Staff training and setting data responsibilities

Staff responsible for undertaking data returns should be appropriately trained in the necessary technical skills to undertake the work as well as having an understanding of the context and specifics of the return.

Responsibilities for data accuracy should appear in job descriptions for those staff with significant management responsibility or where data handling forms an important part of the role.

Every member of staff should understand their role in contributing to good quality data as well as their individual responsibilities and be aware of the implications of poor data quality both within the institution and externally.

Members of staff should be encouraged to report immediately to their manager if data quality issues are identified. The manager should undertake appropriate action to remedy the situation where appropriate.

Audit and assurance reporting

The Internal Audit service will carry out work to support the Audit Committee's requirement to report as part of its annual opinion on the management and quality assurance of data.

This work will typically include consideration as to the scope and application of these Corporate Standards and a review of the controls and procedures in place for the preparation and submission of a selected return.

The Executive Group member with strategic responsibility for data quality will report annually to the Audit Committee. The content of this report will inform the University's risk management process.

The Audit Committee is required to give, as part of its annual opinion, assurance over management and quality assurance of data submitted to the Higher Education Statistics Agency (HESA), Student Loans Company (SLC), Office for Students (OfS) and other funding or regulatory bodies.

Summary of key actions

- Each Professional Service Head should compile and maintain a list of the regular data returns submitted by their department on behalf of the University, with an indication of both the financial and reputational risk attached to each return.
- Each Professional Service Head should ensure procedure notes are maintained for each regular external data return.
- A summary of each regular external return should be approved by the Executive Group and a Data Return Checklist completed, reviewed and signed off for all high risk data returns. Additionally the Vice-Chancellor may be required to sign off the return as "Accountable Officer".
- Each Professional Service Head should ensure that there is adequate cover in the specialist skills and knowledge necessary to complete each external return.
- Each new external demand for data should be reviewed from the perspective of the external implications and the Executive Group member responsible alerted.
- Data returns, and compliance with these Corporate Standards, will form part of the work of the Internal Audit service.

- A periodic (biennial) review of the Corporate Standards for Data Quality will be undertaken by the Executive Group to ensure that they remain fit for purpose, with any proposed amendments presented to the Audit Committee for consideration.

Contact

Advice or questions concerning these Corporate Standards or issues arising from them should be addressed to Dr Sinead Critchley, Secretary to the Council, councilsec@kent.ac.uk.

Document review date

This policy will be reviewed annually.

Version	Author	Description of Change	Date	Next Review date
1.1		Amended	12.02.2020	
1.2		Amended	11.05.2021	
2	Director SPP, DPO, Assistant Director -Assurance	Minor formatting to align with Kent brand HEFCE deleted, OfS added, acronyms written in full, 'a' added before 'low', 'Data Protection Act 98' deleted and replaced with UK GDPR, references to the Data Protection and Record Management policies included, 'Planning and Business Information' changed to 'Planning and Data Engineering' 'Head of Institution' changed to 'Accountable Officer' Document control added.	April 2023	April 2024

Document approval

Version	Review/Governing Body	Review/Approval Date
1		15.08.2017
2	Executive Group - review	05.06.23
2	Audit Committee - approved	13.06.2023