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

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.

Universities need accurate and reliable information in order to manage their 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 reflects a well-run institution
- Enabling the Audit Committee to give, as part of its annual opinion, assurance over management and quality assurance of data submitted to HESA and to HEFCE and other funding bodies which is a requirement of The HEFCE Model Financial Memorandum between HEFCE and institutions.

Introduction

This paper introduces a set of standards with the aim of safeguarding 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 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 low risk.

All users of statistical data held on University systems should be aware of the key principles of data processing contained in the Data Protection Act (1998) and staff responsible for the collection, storing and reporting of data should undertake mandatory data protection training.
Governance and Leadership
Council hold ultimate responsibility for data quality assurance, however, it is the day to day responsibility of individual members of staff to ensure that the principles of this policy are followed to maximise the accuracy and timeliness of data returned externally.

Data Scrutiny & Review
- The need for data items should be periodically reviewed to ensure the data is necessary and that it is collected in the most efficient form
- Where ever possible, data held on university systems should be;
  - subject to on-line validation at the point of entry
  - subject to verification by the data subject (where appropriate)
- All data held on University systems should be scrutinised on an on-going basis for reasonableness, accuracy and fitness for purpose with extensive exception reporting 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

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 Department Head or equivalent
- The relevant head of a Professional Service Department should evaluate summary statistics for each set of data returned externally;
  - for reasonableness
  - for context in terms of summary statistics for previously submitted data
- Help should be solicited from an appropriate office (i.e. Planning and Business Information) should the necessary technical skills to undertake this work, not be available to a Professional Service Head

Final review and signoff
As a minimum, the EG member responsible for the appropriate Professional service department will then undertake a high level check for credibility and reasonableness before signing off the data return

Procedure notes
- Procedure notes should inform each external return - periodically updated to reflect most recent instruction and practice
- Professional service Heads should ensure that all such procedures are adopted and embedded within working processes to achieve compliance

Resilience and Backup
- Organisational resilience should be delivered through ensuring that each data return can be compiled by a least two competent and fully trained members of staff – preferably each with practical experience of undertaking the return – 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 will undertake appropriate action to remedy the situation.

Audit

- Each occurrence of the external submission of data should demonstrate 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 analysis for any differences for each return.

- Internal audit 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 include a consideration of the application of these standards and a review of selected returns.

Summary of Key Actions

- Each Head of a Professional Service Department should compile and maintain a list of the regular data returns made by their section on behalf of the University.

- Each Professional Service Head should ensure that a set of protocols (in the form of procedure notes) is maintained for each regular external return.

- A summary of each regular external return should be approved by the Executive Group member responsible for the area covered by the return. Additionally the Vice Chancellor may be required to sign off the return as ‘Head of Institution’.

- 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 a perspective of the external implications and the Executive Group member responsible alerted. This implies that the data return will be summarised and evaluated against previous or similar data returns.

- Data returns, and compliance with this strategy, will form part of the work of the internal audit team.

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