

# Data Quality Policy

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# Document Version Control

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# 1. Introduction

Bury Council recognises that reliable information is essential, and the availability of complete, accurate, relevant, accessible and timely data is fundamental in supporting Bury Council to achieve its goals. Bury Council recognises that all decisions, whether service delivery, performance management, managerial or financial need be based on information which is of the highest quality.

The data held by Bury Council must be:

- held securely and confidentially;
- obtained fairly and lawfully;
- recorded accurately and reliably;
- used effectively and ethically; and
- shared appropriately and legally

This document underpins Bury Council's objective to record and present data of the highest quality and it is intended to cover all data that is entered onto computerised systems within Council services, and all paper-based records. It should, therefore, be considered in conjunction with the Council's suite of Information Governance policies. It covers primarily data relating to research, the delivery of services, financial management, service management, performance management, corporate governance and communications. In this regard, it should be noted that this policy is not restricted to just performance indicators.

This policy is part of Bury Council's Information Governance Framework and should be read in conjunction with the other policies and procedures within the framework.

## Scope

This policy covers the collection, recording, validation, further processing and reporting of all types of information generated and used within, or reported externally, by Bury Council. It also defines the governance arrangements, the key roles and provides protocols to ensure robust data quality is embedded throughout Bury Council assets.

This policy applies to all Bury Council employees, seconded staff members, volunteers, contractors, temporary staff and employees of other organisations who directly or indirectly support Bury Council services and therefore must be aware of, and adhere to, the Data Quality Standards outlined below.

## 2. Policy

As Bury Council generates a wide range of information for a whole variety of uses, this policy statement does not provide detailed guidance for specific data items or individual areas of application; these are contained within the supporting protocols and procedures. It concentrates instead on general principles of completeness, accuracy, ongoing validity, timeliness, consistency of definitions and compatibility of data items and signposts where specific procedures and guidelines need to exist.

Bury Council has identified seven key characteristics of good quality data:

1. **Accuracy** - Data should be sufficiently accurate for the intended use, not be misleading as to any matter of fact, and should be captured only once, although it may have multiple uses. Data should be captured at the point of activity. Data should be kept up to date and any inaccurate data, having regard to its purpose, should be erased or rectified without delay.
2. **Validity** - Data should be recorded and used in compliance with relevant requirements, including the correct application of any rules or definitions. This will ensure consistency between periods and with similar organisations, measuring what is intended to be measured.
3. **Reliability** - Data recorded should reflect stable and consistent data collection processes across collection points and over time. Progress toward performance targets should reflect real changes rather than variations in data collection approaches or methods. The mechanism for collecting and storing data should do so without contradiction or unwarranted variance.
4. **Timeliness** - Data should be captured as quickly as possible after the event or activity and must be available for the intended use within a reasonable time period. Data must be available quickly and frequently enough to support information needs and to influence service or management decisions.
5. **Relevance** - Data captured should be relevant to the purposes for which it is to be used. This will require a periodic review of requirements to reflect

changing needs. There should be a level of consistency between the data content and the purpose.

6. **Completeness** - Data requirements should be clearly specified based on the information needs of the organisation and data collection processes matched to these requirements.
7. **Accessibility** – Where there are no legal or regulatory constraints, individuals using data should have the right level of access in order to perform the task effectively.

### 3. Risk Management

Examples of the risks associated with data quality problems are:

- Negative consequences, financial and other, as a result of submitting inaccurate or misleading data.
- Inappropriate decision-making and inefficient provision of Bury Council services.
- Reputational damage.
- Harm to an individual or group of individuals whom Bury Council has a duty to protect.
- Affecting relations and data sharing arrangements with partners and agencies.
- Regulatory action and fines from the Information Commissioner for breaches of DPA or FOI legislation.

Data Quality has three main high level aspects of risk management; the identification of compliance requirements; the identification and assessment of business risks, and the application of risk mitigation measures.

#### 1. Identification of compliance requirements

Through the use of resources and ongoing assessment Bury Council is assessed and judged on the quality of the data it produces. This is especially important in terms of national indicators, local indicators (e.g. the business service plan) and other data reported to central government departments all of which depend on good quality data for their accuracy and supporting evidence. Statutory,

regulatory and partnership compliance requirements will be assessed and incorporated into the Data Quality policy and supporting protocols.

## **2. Identification and assessment of business risk**

Ever-increasing use of computerised systems provides greater opportunities to store and access many types and large volumes of data, but also increases the risk of misinformation, and therefore poor decision-making, if the data from which information is derived is not of good quality. This risk applies both to the Authority's internal use of information and to information conveyed in the form of statutory returns to Central Government and its various agencies. In addition, the Authority provides data to the many partnerships to which it belongs. For that information to have value it is essential that the data that underlies it is consistent, accurate and complies with national standards.

## **3. Application of risk mitigation measures**

Measures will be put in place to mitigate risks to information. These common key indicators will be detailed in the data quality policy and protocols. A framework of protocols and guidance will be produced covering the following areas:

- Data Quality Standard
- Governance
- Roles and Responsibilities
- Training and awareness
- Correcting Data to ensure accuracy, completeness and validity
- Manipulation and Reporting
- Monitoring and evaluation
- Data Minimisation

It is for the above reasons that Bury Council requires a Data Quality Standard which can be incorporated into the Data Quality policy and supporting protocols.

## **4. Data Quality Requirements**

In order to meet the characteristics of good data quality, each service area with responsibility for data should ensure that the following are adopted:

**Accountability:**

Procedures, induction and training for staff with responsibility for data processing should cover;

- The need for good quality data and how staff contribute to it;
- Individual responsibilities with regard to data collection, storage, analysis and reporting;
- Responsibility to report any systematic data quality issues immediately to a manager who should ensure remedial action is taken.

**Policies and Procedures:**

- Local procedures must exist for all key activities such as large scale data collection;
- Policies and procedures should be reviewed regularly to consider their impact on data quality and to ensure they reflect any changes within the service areas;
- Heads of service must ensure policies and procedures are adopted and embedded within processes and that compliance is achieved.

**Security:**

- Bury Council must have in place appropriate security arrangements to ensure that data is protected from unauthorised access;
- Security arrangements in place to ensure appropriate levels of access to data by individual staff including role based access controls

## 5. Compliance and Monitoring

### Legal and Professional Obligations

Bury Council will take actions to comply with the relevant legal and professional obligations, in particular:

- General Data Protection Regulation and Data Protection Act 2018
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- The Information Commissioner's Office (ICO) code: anonymisation: managing data protection risk code of practice



- NHS Digital Data Security and Protection Toolkit

## Training

Bury Council will provide relevant training both online and face to face to ensure that staff understand the legislation and its application to their role.

All staff must complete mandatory data protection training every year and undertake any further training provided by Bury Council to enable them to perform their duties appropriately specifically those staff responding to complaints, Subject Access Requests and Freedom of Information requests.

Completion of training will be monitored by the Policy and Compliance Team and all employees must have regard to the Data Protection Legislation and this policy when collecting, accessing, using, disclosing or destroying personal information. Failure to do so may result in disciplinary action and legal prosecution.

If an employee is in any doubt about how to handle personal information or how to apply the pseudonymisation/anonymisation techniques mentioned above, they should speak to their line manager or contact the Policy and Compliance Team by emailing [IG@bury.gov.uk](mailto:IG@bury.gov.uk).

## Policy Review

This policy will be reviewed regularly by the Policy and Compliance Team to ensure that it is updated in line with any change in legislation.

Bury Council will continue to review the effectiveness of this policy to ensure that it is achieving its intended purpose.

Any breaches of the principles in this policy must be reported to the information governance team immediately; [ig@bury.gov.uk](mailto:ig@bury.gov.uk).

Where staff fail to follow and comply with this policy it may result in disciplinary action via the HR channels.

## 6. Policy exemption

Occasionally there may be situations where exceptions to this policy are required, as full adherence may not be practical, could delay business critical initiatives or could increase costs.

Where the significance and purpose of the data does not justify a particular aspect (for example the cost of building an internal system validation check outweighs the benefit of the additional data accuracy) then this should be risk assessed on a case-by-case basis. Where there are justifiable reasons, the Data Protection Officer must be consulted immediately using [ig@bury.gov.uk](mailto:ig@bury.gov.uk) .