

EPPING FOREST DISTRICT COUNCIL DATA QUALITY STRATEGY

1. Introduction

The Council recognises the importance of good quality data. Consistent, accurate, timely and comprehensive information is vital to facilitate the Council's decision-making process and to deliver better quality services to our customers.

The purpose of this strategy is to set out the Council's approach to improving data quality. We recognise the increasing importance placed upon data as a tool for assessing our performance, and achieving our aims and targets. We also recognise the important role that the Audit Commission has in terms of performance monitoring as a way of establishing compliance with external requirements and challenging current practice. This strategy seeks to achieve a co-ordinated approach to ensure consistently high standards are achieved both within and across services with respect to data quality. The outcomes expected from the adoption of this strategy are that Council data will be accurate and verifiable and that all staff will know the part they play in this process.

2. Our Strategy Statement – Principles of Good Data Quality

The Council will seek to ensure that the following principles are adhered to and that staff understand and act on them:

- understanding and awareness: that all staff recognise the need for high standards of data quality and their individual roles in achieving this;
- understanding data definitions: that all appropriate staff are aware of the precise definition of data collected, be this nationally or locally determined, and that clear definitions support the data used by the Council;
- data input: that only authorised staff have responsibilities for data input, that the input of data takes place on a timely and regular basis, and that there are appropriate controls to achieve this;

- data verification: that there are corporate verification processes in place which are adhered to by all staff involved in the data collection process, and that these procedures are appropriately located within services close to the point of input;
- systems: these must be suitable for their purpose, staff must have the appropriate training and expertise to use them, and they must be regularly reviewed on a risk assessment basis;
- output of data: the used data by the Council must be extracted in a way that ensures there is a clear data trail, it is regularly extracted and communicated in a timely manner; and
- presentation: that Council data is presented in a way which is easy to understand, is accurate and can lead to the drawing of conclusions, both for internal use, external inspectorates and our customers.

3. Responsibilities for Data Quality

(a) Member Level

(i) The Executive

The Cabinet is responsible for the Council's overall approach to data quality in its role in the setting of policy and strategy.

The Finance and Performance Management Cabinet Committee is responsible for receiving reports from the Audit Commission and Internal Audit Service with respect to data quality, to consider risk management issues and be responsible for corporate performance management.

Individual Portfolio Holders are responsible for the data quality issues in their services, and ensuring that services have appropriate data quality processes in place.

(ii) The Scrutiny Process

The Finance and Performance Management Scrutiny Panel is responsible for scrutinising data quality. It is also responsible for reports and information about data quality issues within services. Through the Overview and Scrutiny Committee, the Finance and Performance Management Scrutiny Panel reports to the Cabinet on these matters.

(b) Officer Level**(i) Management Board**

Management Board has oversight of all data quality issues at officer level in the Council. As part of this process it will receive regular reports on data quality and associated performance issues, and will challenge the accuracy/veracity of this. It is also responsible for agreeing improvement plans for data quality matters which do not require member approval.

(ii) The Joint Chief Executive (Resources)

This postholder has overall responsibility for data quality issues at officer level.

(iii) Heads of Service – General Responsibilities

Heads of Service have full responsibility for the quality of data within their individual services, and must appoint appropriate officers to discharge data quality functions, as necessary.

(iv) Heads of Service – Specific Individual Responsibilities

- the Head of Finance as Chief Financial Officer has responsibility for data quality with respect to the Council's financial regulations, systems and processes;

- the Head of ICT is responsible for the security policy for the authority's ICT function, the proper use of e-mail and internet data, and for data protection issues;
- the Head of Legal, Administration and Estates is the Council's Monitoring Officer and has responsibilities for making available executive decisions and for the provision of advice on matters such as financial propriety, probity and the budget framework. The Head of Research and Democratic Services is Deputy Monitoring Officer;
- the Head of Research and Democratic Services is responsible for Freedom of Information Act Data Quality issues;
- the Chief Internal Auditor is responsible for the delivery of an annual Audit Plan within which issues of data quality will feature strongly as appropriate.

(v) Data Inputters in Individual Services

These staff are responsible for ensuring that the data they input is accurate, is inputted on a timely basis, and is verifiable in the audit process.

(vi) All Staff

All staff are responsible for ensuring that they understand the Council's data quality strategy and objectives so far as these apply to their role. They are responsible for understanding the importance of accurate and verifiable data and the part that they may play in the Council's data quality processes. Responsibilities should be set out in Job Descriptions and be discussed in SDRs where appropriate.

4. KEY ELEMENTS IN THE DELIVERY OF THE DATA QUALITY STRATEGY

(i) Maintenance and Improvement of Data Quality Systems

Responsibility for maintaining a robust control environment for information systems lies within Services.

Each system should have a named officer responsible for data quality issues. The responsible officer is required to ensure that:

- users are adequately trained, where appropriate by having a formal training programme which is periodically evaluated and adapted to respond to changing needs;
- there is security of access/amendment;
- periodic tests of the integrity of data are undertaken;
- information management and support is available to users;
- system upgrades are made where necessary;
- the system meets managers' information needs;
- feedback from users is acted upon;
- the system can produce adequate audit trails;
- actions recommended by system reviews (e.g. by the external auditors) are implemented;
- a set of written procedures (user guide) exists for the purpose of entering and extracting data; and
- a business continuity plan for the system exists to protect vital records and data.

There should also be a named substitute officer who can deputise in the data quality lead's absence by (at least) maintaining the day-to-day functionality of the system. It is also essential that written procedures are designed so that another officer can carry out the procedures essential to providing data if the officer who normally performs these duties is absent.

There will sometimes be systems where work has to be undertaken to rectify gaps in the control environment. To identify these systems there needs to be an evaluation of information systems used in the Council to produce data. Individual services are responsible for this function, including the undertaking of risk assessments of systems, where required.

There are a number of conditions that might lead to a system being considered high-risk and every system needs to be considered against these factors. 'High risk' conditions will include:

- a high volume of data/transactions;
- technically complex data definition/guidance;
- problems identified in previous years;
- inexperienced staff involved in data processing/production;
- a system being used to produce new data; and
- known gaps in the control environment

The purpose of undertaking a risk assessment is to target limited resources at the areas that require most attention.

Where high-risk systems have been identified for attention, the following steps will need to be taken:

- analysis of the control environment;
- identification of gaps;
- design of additional controls and procedures to address gaps;
- preparation of an action plan; and
- monitoring the implementation of the action plan

(ii) Procedures for verifying data – guidance

Data requirements should be designed along the principle of 'getting it right first time' in order to avoid waste in the form of time and money spent on cleansing data, interfacing between different information systems, matching and consolidating data from multiple databases and maintaining outdated systems.

Nevertheless, in complex systems, even where there are strong controls over input, errors can creep in. Where it is needed, a verification procedure should exist close to the point of data input. The frequency of verification checks will need to be aligned with the frequency of data reporting.

The simplest verification system might be a review of recent data against expectations, or a reconciliation of systems-produced data with manual input records. Depending on the complexity of the system, it might be necessary to undertake more thorough verification tasks, such as:

- data cleansing, e.g. to remove duplicate records or to fill in missing information;
- sample checks to eliminate reoccurrence of a specific error, e.g. checking one key field of data against documentation, for a sample of cases;
- test run of report output, to check the integrity of the query being used to extract data; and
- spot checks, e.g. on external contractor information

Particular attention needs to be paid to data provided by external sources. For example a number of PIs are calculated using information provided by contractors and the Council's intention must be to work alongside contractors to ensure that such data is accurate.

When entering into contracts with service providers it is essential that, wherever relevant, there is a requirement to provide timely and accurate data, and that we are clear with the contractor about their responsibilities for data quality and how we will be checking the information they provide.

It might not always be possible to alter existing contracts so that contractors are fully committed to providing an agreed quantity or quality data. In this case, the data must be treated as high-risk and thought must be given to establishing a system of checks and measures to ensure that we are confident about the accuracy of this data. When carrying out checks on such information it is important that this is documented and signed off by the relevant officer.

Some important data – for example, road safety and crime statistics – is provided directly to the Council by external agencies. The initial priority of this strategy is to address shortcomings in information provided directly by and to us, but where concerns exist about the integrity of externally-provided information, the Council's intention is to work with other agencies constructively wherever possible to provide assurance and rectify any problems identified.

(iii) Inputting of data

There must be adequate controls over the input of data. Systems-produced figures are only as good as the data input into that system in the first place. The aim should be 100% accuracy 100% of the time. It is important that officers have clear guidelines and procedures for using systems and are adequately trained to ensure that information is being entered consistently and correctly.

A key requirement is that data should be entered on an ongoing basis, not saved up to be entered in a block at the end of a period. This reduces the error rate and the need for complex verification procedures.

Controls should also be in place to avoid double-counting. These should be designed according to the nature of the system, in particular where more than one person inputs data. A likely control will be an absolutely clear division of responsibility setting out who is responsible for what data entry.

The system must also record all relevant information. Individual systems need to be evaluated to determine whether additional controls are necessary. An additional control would be necessary if there is any way, theoretically, that a relevant case could exist without being captured by the current system.

(iv) Data output

Data must be produced to a timetable, which allows for management action and review. Services must ensure that processes exist to obtain data output to this timetable, without compromising data quality.

It is important that data is subject to scrutiny and to challenge before being passed up the line for management/member action. This can be undertaken at several stages in the process. The most likely instances will be a verification check on output reports as part of a service level review of data.

(v) Presentation of data

When information is presented for management review, action or audit an officer must carry out an independent review of working papers to confirm that the data definition has been followed, the calculations are correct and the data is supported by a full audit trail.

5. BVPI/LPI DATA QUALITY

The principles of the data quality strategy set out in Section 4 apply fully to the collection of PI data.

(i) Responsibilities

- The Cabinet is responsible for the establishment of an annual set of key performance indicators, which reflect the Council's core business.
- Individual Portfolio Holders are responsible for data quality issues with respect to PIs in their services, and ensuring appropriate data quality processes are in place.
- The Finance and Performance Management Scrutiny Panel is responsible for the Scrutiny of PI data, including issues of data quality.
- Management Board receives reports on at least an annual basis on performance indicator information, challenging this, and agreeing improvement plans for individual indicators.
- Heads of Service are responsible for agreeing quarterly PI returns and end of year outturn figures within the PI verification framework.

- Performance Indicator Responsible Officers in services must ensure, under the direction of the relevant Head of Service, that all data relating to performance information is accurate, verifiable and is easily auditable. They are responsible for ensuring the timely completion on a quarterly basis of PI information for the Head of Service.
- Data inputters in services are responsible to the Service PI responsible officer for ensuring data related to PIs is accurate, verifiable and implemented in a timely fashion.
- The Head of Human Resources and Performance Management is responsible for the overall collection and presentation of PI data in the Best Value Performance Plan of Council Plan, and for reporting these to Council Committees.

(ii) Data Quality Procedures for Collecting and Managing PI Information

Heads of Service and other responsible officers must follow the guidance laid down by the PMU for PI data collection. This stipulates that a PMU proforma , accompanied by a full audit trail, must be compiled for any PI presented on a quarterly basis. This must include:

- A detailed calculation
- System notes, where appropriate; and
- Documentation supporting any estimates, sampling, or any apportionments made.

In addition, the relevant officer must complete the appropriate 'fields' on the TEN system, including a comment on performance, any corrective action to be taken to improve performance, and a quarterly estimate as to whether the target will be met.

(iii) Improvement Plans for KPIs

Each year, the Cabinet identified PIs which it considers to be key to the business of the Authority. Management Board require Heads of Service to produce Improvement Plans for these KPIs, which are monitored during the year. Heads of Service are responsible for improving performance, for these indicators.

6. MONITORING AND REVIEW OF THE DATA QUALITY STRATEGY

Progress with the implementation of the data quality strategy will be monitored by Management Board, in consultation with the PMU and Heads of Service.

7. ACTION PLAN – APPENDIX 1

8. MATRIX OF DATA QUALITY RESPONSIBILITIES – APPENDIX 2

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