Data Quality & Management Policy

Executive Summary

This Policy sets out the manner in which the Royal Veterinary College (RVC or College) wishes to ensure a whole institution approach to Data Quality and Management in support of legislative, regulatory, statutory and business requirements. Data Management is defined as the processes, procedures and practices that support good data quality. Data Quality is defined as the: accuracy, validity, reliability, timeliness, relevance, and completeness of data.

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Data Quality & Management Policy

1. **Policy Statement**
   The University needs timely, accurate and reliable data in order to manage its activities and meet internal and external requirements to demonstrate accountability through accurate reporting. Specifically the RVC needs to ensure good data management and data quality so that it can:

   - provide economic, efficient and effective (i.e. Value for Money) services to students, staff, clients, referring veterinary practices, partner organisations and other stakeholders;

   - produce accurate and comprehensive management information on which timely, informed decisions can be made to inform both the day to day management and the future direction of the College;

   - monitor and review its activities and operations;

   - produce accurate external returns to ensure accurate funding allocations, accreditations and performance information to demonstrate accountability to public and private funders, and in particular meet the terms of the Memorandum of Assurance and Accountability (See Appendices A & C) between HEFCE and higher education institutions;

   - be efficient, effective and compliant in its approach to the gathering, processing, retention and disposal of data;

   - be compliant with 8 Principles of the Data Protection Act 1998 (See Appendix B).

2. **Benefits of a whole institution approach to Data Quality & Management:**
   - Good data ensures that the mandatory and good practice conditions of external stakeholders are met.
   - Good data supports accurate external and internal impressions of institutional performance in teaching, research, clinical standards and public engagement.
   - Good data results supports better planning, better decision-making and better strategic development and review across the RVC.
   - Good data helps minimises the likelihood of reputational damage in areas such as student recruitment and access, student, staff and clinical records.
   - Good data supports high quality reporting to sponsors of research, thereby minimising the likelihood of financial penalties from funders or, depending upon the extent of the problem, reputational damage and diminished funding for research.
   - Good data supports the appropriate disbursement of public funds and/ setting of fee rates minimising the possibility of over or underpayments and helping ensure accurate forecasting and planning

3. **Authority and Jurisdiction of the Policy**

3.1 This policy applies to all employees, students and all sub-contracted staff.

3.2 The policy applies to all data and information related policies, procedures, systems and processes.

3 Definitions:

Data: raw quantitative or qualitative facts and figures

Data Processing: the holding or use of data

Data Management: is defined as the processes, procedures and practices that support good data quality

Data Quality: In March 2007, the Audit Commission published a framework to support improvement in data quality in the public sector. This framework includes six key characteristics of good quality data, which may be summarised as follows:

a. Accuracy
- Data should provide a clear representation of the activity/interaction
- Data should be in sufficient detail
- Data should be captured once only as close to the point of activity as possible

b. Validity
- Data should be recorded and used in accordance with agreed requirements, rules and definitions to ensure integrity and consistency

c. Reliability
- Data collection processes must be clearly defined and stable to ensure consistency over time, so that data accurately and reliably reflects any changes in performance

d. Timeliness
- Data should be collected and recorded as quickly as possible after the event or activity
- Data should remain available for the intended use within a reasonable or agreed time period

e. Relevance
- Data should be relevant for the purposes for which it is used
- Data requirements should be clearly specified and regularly reviewed to reflect any change in needs
- The amount of data collected should be proportionate to the value gained from it

f. Completeness
- Data should be complete

Data Controller: means a person or entity who determines the purposes for which and the manner in which any data are, or are to be processed

Information: a collection of data provided in a meaningful form or context.

4   Roles & Responsibilities

5.1 Responsibilities of Staff:
- Every member of staff should recognise the need for good quality data and how they can contribute to it.
- Every member of staff should be aware of, and act in accordance, with their individual responsibilities with regard to data collection, storage, transmission and transportation analysis and reporting.
- Every member of staff should be aware of the implications of poor data quality in their area in terms of internal and external accountability including those affecting other departments and the institution as a whole.
- Every member of staff should report any systematic data quality issues immediately to their manager who should ensure remedial action is taken.
- Every member of staff should be aware of the policies and procedures related to data quality such as information security and data protection.

5.2 Responsibility of Audit Committee:
- Audit Committee has delegated responsibility from Council to have oversight of the Colleges arrangements for assuring data quality and data management.

5.3 Responsibilities of the College:

5.3a Policies and Procedures
- It is the responsibility of the college to: issue, update and operate in accordance with; this Policy and relevant legislation.
- The institution should define clearly its key data requirements and assurance arrangements.
- Local procedures must exist for all key activities such as major data collection exercises and external returns.
- All such policies and procedures should be reviewed regularly to consider their impact on data quality and to ensure they reflect any change in need.
- Departmental managers should ensure that all such policies and procedures are adopted and embedded within working processes and that compliance is achieved.
- Policies and procedures should be clearly labelled with their version, the responsible role or department, their review cycle and history and their approval chain.

5.3b Information Security
- The RVC should apply the Information Security Principles of Confidentiality, Integrity and Availability to all of its data management activities.
- The RVC must have in place appropriate security arrangements to ensure that data is protected from unauthorised access from outside the institution.
- All RVC-wide systems must have security arrangements in place to ensure appropriate levels of access to data by individual staff and students.

5.3c Staff Development

- All members of staff accessing, inputting and amending data on RVC wide systems should have the appropriate knowledge, competencies and capacity to carry out the activity and preserve data quality
- All policies procedures and guidelines should be communicated effectively to relevant staff, and this will include policies on security and data protection as part of the wider consideration of data quality
- Appropriate staff development should be provided at induction and periodically to enable staff to meet the objectives of this policy, and be reviewed at appraisal and updated to reflect any change in need
- Responsibility for data quality should be included in job descriptions with significant data handling or management responsibilities

5.3d Systems and Processes

- Clear systems and business processes should exist in which data collection and reporting are an integral part.
- Guidelines for all processes supporting key data requirements as defined by the institution should exist and be followed consistently across the institution.
- Data should be collected and recorded once only wherever possible without the need for multiple systems.
- Data collection systems should contain internal validation to ensure accurate and complete data.
- RVC-wide systems should have internal validation checking facilities to ensure data is complete, consistent and internally validated.
- All systems should be electronic wherever possible to reduce the risk of manual error, except where there is a need to collect, process and store original documents.
- There should be clear strategies for data storage and archiving from systems, with retrieval and security appropriate to an evaluation of present value and future use.

APPENDIX A: Schedule of Data Returns (2016)

Data Return	Responsibility			Key risks	Risk type (exposure)	Validation checks	Developmental processes
	Preparation	Review	Sign-off				
HEFCE - HESES	Student Records & Planning Officer	Student Returns scrutiny group[1]	Principal	Changes to HEFCE funding for teaching; understanding complex reporting rules	Financial (£0k - £500k)	Cross referring to SITS data reports and summaries; HESES validations Internal Audit reviews	Review of guidance; HESA training days; joint HESA/HEFCE/HESPA seminar days
HESA – Students	Student Records & Planning Officer	Review Student Returns scrutiny group	Principal	Changes to HEFCE funding for teaching; understanding complex reporting rules	Financial (£50k - £500k)	Cross referring to SITS data reports and summaries; HESA produces own validation reports	Review of guidance; HESA training days; joint HESA/HEFCE/HESPA seminar days
Destination of Leavers in Higher Education (DLHE - HESA)	Careers Group	Review Student Returns scrutiny group	Principal	Changes to return requirements & raised profile for TEF metrics	Reputational (TEF eligibility/ student recruitment)	Previous year comparisons/ HESA validations	Review of guidance; HESA training days; joint HESA/HEFCE/HESPA seminar days WONK HE

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[1] Academic Registrar / Head of Governance, Planning and Compliance/ VP: Learning & Student Experience/ Student Records and Planning Officer

Key Information Set	Student Records & Planning Officer	Review Student Returns scrutiny group	Principal	Changes to return requirements & raised profile for TEF metrics	Reputational (League tables / student recruitment)	Previous year comparisons	Review of guidance;

Data Return	Responsibility			Key risks	Risk type (exposure)	Validation checks	Developmental processes
	Preparation	Review	Sign-off				
HESA – Staff	HR Systems & Process Co-ordinator	Staff returns scrutiny panel[2]	Principal	Student staff ratios; comparative sector pay reporting; league table reporting	Reputational	HESA validation checks	Review of guidance; HESA training days; joint HESA/HEFCE/HESPA seminar days
HESA – Finance	Assistant Director of Finance (Financial Planning)	Director of Finance VP: Research & Innovation Assistant Director of Finance (Financial Planning)	Principal	Inconsistency with financial statements and data returned to HEFCE as part of accountability process; inaccurate calculations of cost per student and cost per staff member (used in league tables)	Reputational Financial Risk - to HEIF income + or - £50K – 100K	Cross reference to financial statements and analytical review against prior year returns; HESA produces own validation reports	Review of guidance; HESA training days; joint HESA/HEFCE/HESPA seminar days

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[2] Director of Human Resources/ Head of Governance, Planning & Compliance/ HR Systems and Process Co-ordinator

Data Return	Responsibility			Key risks	Risk type (exposure)	Validation checks	Developmental processes
	Preparation	Review	Sign-off				
HEFCE Transparent Approach to Costing	Management Accountant for Research & Innovation	Assistant Director of Finance (Financial Planning) Director of Finance / TRAC Steering Group [3] Audit Committee	Principal	Impact on fEC rates chargeable on research grants; impact on reported teaching cost per student (used to inform price bands)	Financial (fEC: 10% error; £80k less overheads) (T funding: worse case band A weighting reduced from 4 to 3; £4m impact)	Reconciliation to financial statements; comparison to prior year returns; benchmarking data made available by HEFCE	Workshops led by HEFCE on key updates to guidance/ methodology; TRAC Steering Group meet three times (October to January)
HEFCE Financial Forecasts	Assistant Director of Finance (Financial Planning)	Director of Finance SMG/ F&GP/ Audit	Council		Financial Reputational Operational	Planning Processes leading up to construction of return	HESPA engagement
HE-BCI (Higher Education Business & Community Interaction)	Director of Research Administration	Assistant Director of Finance (Financial Planning) Director of Finance VP: R&I	Principal	Loss of HEIF funding, and poor reporting on Knowledge exchange work.	Reputational Financial Reduction in HEIF funding	Review against prior year returns	Workshops led by HEFCE on key updates to guidance/ methodology

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[3] This group comprises the Vice-Principal Research, Director of Finance, Head of Research Administration and Management Accountant

Data Return	Responsibility			Key risks	Risk type (exposure)	Validation checks	Planning processes
	Preparation	Review	Sign-off				
HEFCE Annual Accountability Return: Assurance return/ financial statements, AC report/ external audit letters/ IA report/ VFM report/ financial commentary/ ASSUR. (NB HESES/TRAC are also part of the AAR)	Director of Finance/ Head of Governance, Planning and Compliance/ External & Internal Auditors/ Strategic Risk & Planning Analyst.	F&GP / Audit Committee	Principal and/ or Council.	Incorrect or inconsistent presentation of College activities and future plans to HEFCE; HEFCE risk assessment changes	Reputational	Auditors/ past performance/ benchmarking	Financial forecasts developed in conjunction with budget setting process each Spring; for 2010 these have been reviewed a number of times due to major changes likely to public funding and need for longer term financial scenario planning

Data Return	Responsibility			Key risks	Risk type (exposure)	Validation checks	Developmental processes
	Preparation	Review	Sign-off				
HEFCE Estates Management Statistics	Acting Head of Estates Projects HR Systems and Process Co-ordinator	EMS Scrutiny Panel[4]	Principal	Inappropriate benchmarking comparisons with sector; league table performance	Reputational	Comparison with prior years; comparison with annual accounts	HEFCE guidance within request publication
RCVS/ AVMA/ AAVMC annual return (student no's, staff, clinical caseload, finances, research)	Multiple – HR/ Finance/ Student Records/ co-ordination by Head of Academic Development	Senior Management Group	Principal	Further review by RVCS, AVMA; ultimately could jeopardise accreditation (extreme)	Reputational Financial (extreme) [no BVM students; £13m income loss US BVM students; £2.5m income]	Cross reference to HEFCE/HESA returns where applicable and year on year comparisons	Annual submission guidance.
OFFA Access Agreement	Head of Widening Participation and Community Engagement and Deputy Director of RVC Access	Director of RVC Access/ VP: Learning & Student Experience Assistant Director of Finance (Financial Planning)	Principal	Failure to have an access agreement will remove ability to charge £9K fee rate or enter TEF	Reputational Financial (reduced fee cap to unsustainable levels)	Comparison with prior years	Annual submission guidance.

[4] Acting Deputy COO Infrastructure/ Acting Head of Estates Projects/ Head of Governance, Planning & Compliance/ Director of HR, HR Systems & Process Co-ordinator/ Director of Estates and Campus Services

APPENDIX B: the 8 Principles of the Data Protection Act 1998 are:

1. Personal data shall be processed fairly and lawfully

2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.

3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

4. Personal data shall be accurate and, where necessary, kept up to date.

5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6. Personal data shall be processed in accordance with the rights of data subjects under this Act.

7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

APPENDIX C: HEFCE's Memorandum of Assurance and Accountability

HEFCE's Memorandum of Assurance and Accountability (which sets out the conditions for the receipt of public funds for HEI's) requires that in accordance with the HEI's own statutes and constitution, there should be effective arrangements for providing assurance to the governing body that the HEI:

a. Has regular, reliable, timely and adequate information to monitor performance and track the use of public funds.

b. Has effective arrangements for the management and quality assurance of data submitted to HESA, the Student Loans Company, HEFCE and other funding or regulatory bodies (HEFCE reserves the right to use and publish its own estimates of data, where we are not satisfied that the HEI data are fit for purpose. HEFCE also reserves the right not to publish data[5]). Responsibility for the quality of data used for internal decision-making and external reporting, which must be fit for purpose, rests with the HEI itself. Data submitted for funding and student number control purposes must comply with directions published by HEFCE; if in doubt an HEI should ask its HEFCE regional consultant to provide an authoritative, written ruling.

Appendix D: Policy coversheet template

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Version	1.1 etc.
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