Data Quality Policy

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1   Introduction

Importance of data quality

The Council, with its partners, is committed to improving the quality of life for all those who live and work in Tower Hamlets. Effective performance management is a key pillar of the Council's way of working and our approach is set out in the Council's Performance Management and Accountability Framework, which should be read alongside this Policy.
http://towernet/Intranet/staff_services/business_planning/performance_inform ation/how_tower_hamlets_performs.aspx

A key aspect of effective performance management is ensuring that the performance data with which we measure our progress is accurate, reliable and timely. Where this is not the case, information may be misleading, decision making flawed, resources wasted or service failures not identified and addressed. The quality of our performance data is therefore central to the way in which we manage and monitor performance.

Tower Hamlets' objective for data quality is to:

> *Ensure that all information which contributes to the Council's performance management, whether produced internally or externally, is accurate reliable and timely.*

This policy sets out the arrangements that the Council has in place to deliver on this commitment and our plans for ongoing improvement of data quality. Its purpose is to bring together in one place the range of existing processes and approaches which exist to manage data quality to ensure that everyone who produces or uses performance data within the Council and its partners understands what is expected of them, and what they can expect from the data they use.

Scope of policy

The main scope of this policy covers performance information which the Council uses to monitor its own, and partners' performance, to report to officers, Members, local residents and Government agencies and regulators. The main focus is non-financial performance information as financial information is already collected according to professional accounting rules, strong internal controls and a formal audit regime. Our financial regulations, which form part of the constitution, provide a framework for financial controls.

In April 2011 the Government replaced the National Indicator Set with the Single Data List – a list of all the data streams that local government must submit to central government. The Council is no longer required to agree targets for performance measures or against data streams. Government

requirements are reduced in favour of increased emphases on localism, transparency and direct accountability to the public.

In 2014/15 the Council has identified 56 Strategic Indicators to measure performance against the Council's key priorities which are monitored corporately. In addition, Directorates monitor a range of additional measures.

Although some external audit obligations have been removed, the Council's obligations to the people who live and work in Tower Hamlets, particularly the most vulnerable remain important. Tower Hamlets Council, and its partners, remains committed to ensuring that all information which contributes to the Council's performance management, whether produced internally or externally, is accurate, reliable and timely. Good quality data will help the Council to use its resources wisely to achieve its commitment to improve the quality of life for all people who live and work in Tower Hamlets.

This refreshed policy aims to maintain and continue to improve data quality in Tower Hamlets, while, where possible, reducing the burden on Directorates.

There are 6 key characteristics of good quality data[1]:
- Accuracy;
- Validity;
- Reliability;
- Timeliness;
- Relevance; and
- Completeness

These principles underpin the Council's approach to data quality.

Arrangements to ensure the quality of performance data (whether in-house or from a third party) therefore need to address:
- how data is captured;
- when data is captured and what period it refers to;
- the definitions and methodologies used to produce data;
- where the data comes from;
- the systems used to produce data and the checks and controls within these systems;
- who has checked it and when;
- who is responsible for the data; and
- what it will be used for.

The remainder of this policy sets out how we will meet standards on data quality which cover:
- Governance and accountability for data quality;
- Policies and procedures for data recording and reporting;

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[1] *Improving information to support decision making: standards for better quality data*, Audit Commission consultation March 2007

- Systems and processes to secure data quality;
- Knowledge, skills and capacity of staff to achieve the data quality objectives; and
- Arrangements and controls in place for the use of data.

To ensure good data quality, we continue to put systems and procedures in place in order to apply these standards and arrangements to partner and third party organisations.

Policies and guidance for data quality are set out in this document. In addition, a Data Quality action plan is attached as Appendix A.

This Policy is reviewed and updated annually, incorporating feedback from internal auditors. The process of review includes consultation with, and dissemination to, Directorate performance leads.

Support to use the Council's performance management software, Excelsis, is available from Directorate Performance Leads and the Corporate Strategy & Equality Team.

Following the recommendations arising from the review of strategy, policy and performance related support functions to simplify, streamline and integrate processes, the onus for quality and content checking of performance information is placed on directorates, via Directorate performance leads. Section 5 of this policy spells out the responsibilities of the corporate team and directorate leads.

The Corporate Strategy & Performance team takes responsibility for updating the Data Quality Policy and procedures and identifying any known internal or external changes and cascading these to Directorates.

Compliance with procedures is monitored by Directorate Performance leads and by the Corporate Strategy and Equality team. Where there is non-compliance, this will be reported to the relevant Director who will have responsibility for ensuring that corrective action is taken.

2   Governance and Accountability

Overall responsibility for management and accountability of data quality lies with the Cabinet and Corporate Management Team (CMT). Within the Cabinet, the Lead Member for Resources has overall responsibility for data quality. Within CMT, the Head of Paid Service, as Chair of Performance Review Group, has overall strategic responsibility for performance management.

The objectives and strategic approach for data quality are set out in this policy which is updated regularly. Progress against this plan will be reviewed periodically by the Performance Review Group which is chaired by the Head of Paid Service..

This Policy and associated procedures is available on the Council's intranet http://towernet/content/staff_services/business_planning_and_performance/20 079/47658/data_quality and any updates will be uploaded to this page. Staff are notified of the data quality and procedure updates via Directorate performance leads and the Managers' Briefing. Where appropriate, policies will also be disseminated via the staff publication, Tower Hamlets Now.

At a corporate level, the Corporate Strategy and Equality team, working closely with Internal Audit, has responsibility for overseeing the corporate policies and procedures for data quality and provides a co-ordinating and quality assurance function. Each Directorate has a performance lead who has responsibility for overseeing the collection and accuracy of performance data within their Directorate. Each strategic measure and Single Data List stream should have a designated Preparing Officer who has overall responsibility for ensuring its validity, accuracy and timely reporting. Responsibilities are set out in the 'Key Roles and Responsibilities' table at the end of Section 5.

In addition, all staff are responsible for the quality of data which they collect or report. Managers are responsible for ensuring that their staff record and input data accurately, and report data in a timely way. Managers are also responsible for following up these actions in performance appraisals, for staff involved in data recording, collection, review, or reporting. Data quality forms part of the Council's "Achieving Results" Core Value.

The Council has an annual programme of data quality review managed by Directorate performance leads and the corporate Strategy and Equality team, supported by Internal Audit. The key elements of this review are as follows:

- Production of working papers including procedure notes providing a clear audit trail for all Strategic Indicators. Working papers need to be completed within Excelsis, except by prior agreement with the corporate Strategy and Equality team, and Internal Audit.
- Using a risk-based approach, the Corporate Strategy and Equality team and Internal Audit will test an agreed sample of selected strategic

measures and data streams within each Directorate to check that the systems and records used for each are sound. Feedback is then provided to preparing officers and Directorate leads;

- Quality checks will be undertaken on a small sample of Strategic Measures and/or Single Data List Submissions (approximately 5 per directorate) by the Strategy and Equality team and by Internal Audit annually.
- If material errors are found as part of the sample-based quality check process, this may lead to a more comprehensive review of data quality systems within the directorate, including Directorate measures and further Single Data List submissions.
- The results of the annual quality review will be fed back to SPP Senior Managers and PRG and will inform the Data Quality action plan and policy refresh.

Working Papers

Working papers serve as proof that the officers responsible for collating and reporting data have understood the definition of the relevant data stream or indicator and have made the right calculations in getting the outturn. This ensures accuracy and consistency in data collection and calculations.

For the Council's Strategic Measures, the working paper should do the following:

- Ownership – Explain who the officers, teams, organisation who have responsibility for each aspect of the indicator are, and provide the name and designation of the senior manager ultimately responsible;
- Understanding – Demonstrate a thorough understanding of the objective/purpose of the indicator, its individual elements and its definition;
- Data and Evidence – Explain the method of data collection and describe an example. State the method of calculation with relevant examples. Provide a summary of activities that supported the various elements of the indicator e.g. action plans, committee reports, strategies etc.;
- Target Setting and Major Changes – The Working Papers should provide information on any targets that have been set, either externally or internally, and provide a rationale for the target. In addition, commentary should be provided on any major variances between the target and outturn for the year, and between the outturn for the year compared to the previous year
- Systems and Consistency – Describe the systems and packages used in the production of the outturn, the systems used to check data quality, and any agreements detailing data collection arrangements with third parties.

Excelsis contains a template which covers the above requirements. The fields in Excelsis form the working papers and these should be completed within it. However, there is no longer a requirement to upload extensive evidence and

supporting documents. Any alternative arrangements must be by prior agreement with the corporate Strategy and Equality team, and Internal Audit.

Other than those subject to the annual quality review sample, working papers are not required for Single Data List submissions or other directorate performance measures. However, Directorates may opt to produce these.

Change Control Protocol

On occasion it may be necessary or desirable to make changes to the method used to calculate a strategic measure outturn. This change control protocol relates to changes in the way we define, calculate and collect performance information. Findings from a recent internal audit report on data quality identified a risk that if management were not kept informed of the potential impact when changing the methodology used to calculate a strategic indicator, there was an increased risk that they are unaware of how the Council is actually performing.

It is therefore essential that any changes are clearly explained, authorised and recorded. Where directorates make a change to the approach for calculating a strategic indicator (such as a change to the definition, method of calculation, reporting frequency or data collection system) these must be reported to Performance Review Group to ensure that they fully understand the impact:
- for changes outside of the Council's control (e.g. Government changes), these must be reported to PRG prior to implementation; and
- for changes within the Council's control, these must be agreed by PRG prior to implementation.

In addition, all changes must be fully recorded and dated in the relevant field in Excelsis working papers.

3   Systems and Processes

Annual sampling is a way of identifying flaws in systems and processes and provides us with an opportunity to improve them. These findings are kept on file for future reference and in order to learn from them.

Working papers are required for all Strategic Indicators reported centrally, and should be refreshed annually to ensure that a consistent and reliable process is being followed. The fields in Excelsis form an electronic working paper and Directorate performance leads should use it for the production of working papers.

Directorates are required to include the ***numerator and denominator*** used in the calculation of in-year and year-end outturns in the monthly and annual comments fields in the Excelsis working papers. Providing this information so that the calculation can be replicated, enables sense-checking of data and

improves the understanding of CMT and PRG as to what is changing in relation to performance.

We rely on source data from third parties (data produced externally) to report on progress on both the Council's and Partnership's work.

To achieve our Data Quality objectives, we need to ensure that data from third parties that we use in our performance management is produced to the same high quality as data produced internally. In collating end-year data, all working papers must set out where data has come from and what action they have taken to ensure the quality of this data.

To complement this work we undertook a mapping exercise in order to better understand our data, where the potential gaps are, and produced a robust risk analysis to identify which data streams, strategic measures and areas we need to concentrate on. We will refresh this exercise periodically to ensure we concentrate our resources according to identified need.

We have developed a number of protocols with our key partners; for example the East London protocol covering data sharing between the Council and NHS Trusts, a police joint protocol for the exchange of information, and a standing arrangement for performance data with East London and the City Mental Health Trust.

4   People, Skills and Training

Roles and responsibilities for data quality are set out in this policy (see table below). As identified above, each Single Data List stream and Strategic Indicator has a designated Preparing Officer who has the key responsibility for ensuring that the relevant data is accurate. Directorate performance leads oversee data quality for their Directorate, and are responsible for ensuring that key systems are checked, that procedure notes are in place where needed and that there are data quality agreements with key partners.

Data Quality training is publicised in Tower Hamlets Now and training is provided on an ad-hoc basis, and available upon request, to those with responsibility for data collection and reporting. Preparing Officers should regularly attend training in order to ensure that performance returns are accurate and appropriately documented.

Key Roles and Responsibilities in Relation to Data Quality

Role	Responsibility
Preparing officer	Accurate and reliable data entry and indicator / SDL calculation, and timely data provision, including any support systems
Authorising officer	Check that preparing officers have carried out responsibilities (can be Directorate Performance Lead)
Corporate Strategy & Equality Team	Update the Data Quality Policy and associated documents when required; lead on the annual sampling of indicators and measures.

Provide support to Directorate Performance Leads to ensure the accuracy of data, liaise with Government and auditors |
Directorate Performance Lead	Disseminate information to other team members within their Directorate and to ensure that data quality requirements are met. This will usually be the Directorate's SPP Service Manager
Performance Review Group	Agree and review progress against the Data Quality Action Plan
CMT	Ultimately responsible for data quality within the Council, together with Cabinet
Audit Panel	Review the formal outcomes of data quality and performance audits. Agree and review progress against the delivery plan
Third Party Organisations / External data sources	Accurate and reliable data entry and timely data provision

5   Data Use and Reporting

The use and analysis of performance data is central to the organisation's performance management arrangements. Key performance indicators and targets are established through the Council's strategic planning framework.

Reports on key performance data are regularly made to senior managers and Members as set out in the monitoring table in the Performance Management Framework. The reports look at trends, external comparisons and risks and identify actions being taken to address risks. Each performance report includes a commentary which is required to address the 4 Ws:
- Why performance is/is not on track;
- What is being done to address any slippage;
- Whether this will bring performance back on track; and
- When performance will be brought back on track.

There are processes to ensure that action is taken to address performance weaknesses identified by performance data and reports. These include the corporate Performance Review Group, chaired by the Head of Paid Service which regularly reviews areas of poor performance. In addition, Directorates undertake performance monitoring and challenge; for example, through use of "Star Chambers" or Bi-Monthly monitoring reports.

Externally reported data is subject to particular controls. All strategic performance data must be supported by a clear audit trail signed off by Directorates. Strategic performance information is reported to CMT, Overview and Scrutiny and Cabinet.