

Data Quality Policy

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Executive Summary

This Policy sets out the manner in which the CCG wishes to ensure a consistent approach to Data Quality, in support of legislative, regulatory, statutory and business requirements.

Data Quality is defined within this policy as the; accuracy, validity, reliability, timeliness, relevance, completeness and robustness of data.

Everyone who is involved in the collection and recording of information is responsible for ensuring its accurate collection in order to minimise risks to the organisation or individuals.

Information Asset Owners (IAO's) are responsible for ensuring documented procedures and processes are in place to ensure the accuracy of information including service user information on all systems and/or records, including those that support the provision of care.

Information Asset Owners (IAO's) are responsible for ensuring adequate training is provided to staff to ensure the accurate collection of information, including service user information and onward reporting of high quality information.

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1 Introduction

Leeds CCG recognises that all of its decisions, whether health care, managerial or financial need to be based on information which is of the highest quality. Data quality is crucial and the availability of complete, accurate, relevant and timely data is important in supporting patient care, governance, management and service agreements for health care planning and accountability.

Leeds CCG aspires to the highest standards of corporate behaviour and clinical competence to ensure that safe, fair and equitable procedures are applied to all organisational transactions, including relationships with patients, its carers, public, staff, stakeholders and the use of public resources.

The importance of having robust systems, processes, data definitions and systems of validation in place to assure data quality is part of this process. The quality of data can affect the reputation of Leeds CCG and may lead to financial penalty in certain circumstances, e.g. failing to meet contractual requirements and other reportable outcome measures.

The purpose of this policy is to provide general principles for the management of all data and guidance. This is to ensure that Leeds CCG can take decisions based on accurate and complete data and can meet its various legal and regulatory responsibilities.

A data quality policy and regular monitoring of data standards are a requirement of the NHS Data Security and Protection Toolkit.

Information accuracy is also a legal requirement under the GDPR/Data Protection Act 2018.

This policy provides the framework to mitigate against the risk of poor data quality and enable individuals within Leeds CCG to take direct responsibility for any data they record or omit to record.

2 Aims

The Data Quality Policy underpins the CCG's objective to record and present data of the highest possible quality and that all users of the information can be confident about its accuracy.

3 Scope

This policy must be followed by all staff who works for or on behalf of Leeds CCG including those on temporary or honorary contracts, secondments, students and any staff working on an individual contractor basis or who are employees for an organisation contracted to provide services to Leeds CCG. The policy is applicable to all areas of the organisation and adherence should be included in all contracts for outsourced or shared services. There are no exclusions.

This policy is applicable to all data held and processed by Leeds CCG.

All data must be managed and held within a controlled environment and to a standard of accuracy and completeness. This applies to data regardless of format.

Written procedures will be available in all relevant locations within Leeds CCG to assist staff in collecting and recording data. These procedures will be kept up-to-date, and where appropriate will also contain information relating to national data definitions.

Processes will be established to ensure compliance with the procedures, which will include sample checks to audit compliance.

It should be noted that all collection, storage, processing and reporting of personal information is governed by detailed legal requirements under the GDPR/Data Protection Act 2018 and associated standards, such as the Caldicott guidelines and Health and Social Care Act 2012.

As Leeds CCG generates and receives a very wide range of information for a whole variety of uses, this policy does not provide detailed guidance for specific data items or individual areas of application. 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 or further guidelines need to exist.

- Patient Care – in the delivery of effective, relevant and timely care, thereby minimising clinical risk.
- Good corporate governance – which, as above, has data quality as a pre-requisite to ensure effective business management.
- Good clinical governance – a pre-requisite for minimising clinical risk and avoiding clinical error and misjudgement.
- Disclosure – ensuring that clinical and administrative information provided to the patient and authorised health partners, including external partners is of the highest quality.
- Business planning – ensuring management can rely on the information to make informed and effective business decisions.
- The measurement of activity and performance to ensure effective distribution and use of Practice resources.
- Regulatory reporting – to ensure compliance with the standards and targets as laid down in measures such as the DSP Toolkit etc.
- Legal compliance – ensuring that Leeds CCG conforms to its legal obligations as laid down in relevant legislation, such as GDPR/Data Protection Act 2018.
- Education and Training – in the development and delivery of quality education and training provision.

4 General Guidelines and Principles of Data Quality

Supplying accurate data is a complicated task for a number of reasons:

- There are many ways for the data to be inaccurate – data entry errors and incomplete data, etc.
- Data can be corrupted during translation depending on who is translating it, how and with what tools/processes.
- Data must relate to the correct time period and be available when required.
- Data must be in a form that is collectable and which can subsequently be analysed.

To ensure an organisation achieves data quality, it must set out how:

- Data is collected and co-ordinated
- Data is transferred between systems
- Data is organised
- Data is analysed
- Data is interpreted
- Conclusions and results drawn from the data are validated

The following overarching principles underpin the Data Quality Policy:

- All staff will conform to legal and statutory requirements and recognised good practice, aim to be significantly above average on in-house data quality indicators, and will strive towards 100% accuracy across all information systems.
- All data collection, manipulation and reporting processes by Leeds CCG will be covered by clear procedures which are easily available to all relevant staff, and regularly reviewed and updated.
- All staff should be aware of the importance of good data quality and their own contribution to achieving it, and should receive appropriate training to data quality aspects of their work.
- Teams should have comprehensive procedures in place for identifying and correcting data errors, such that information is accurate and reliable at time of use.

Data can be said to be of “high quality” if the data accurately portray exact details and/or events that actually took place – the following principles should be considered when doing so.

- **Accessibility**
Information can be accessed quickly and efficiently through the use of systematic and consistent management in

electronic (and physical) format. Access must be appropriate so that only those with a lawful basis and legitimate relationship to the data may view, create or modify them.

- **Accuracy**
Data (and information) are accurate with systems, processes and practice in place to ensure this. Any limitations on accuracy of data must be made clear to its users and effective margins of error need to be considered for calculations.
- **Completeness**
Completeness can have a real impact of the quality of data. The evaluation of data quality must monitor for missing, incomplete or invalid information as well as identification for future or occurring causes and the associated risks.
- **Relevance**
Data captured should be appropriate for the intended purpose and never excessive.
- **Reliability**
Data and information must reflect a stable, systematic and consistent approach to enhance reliability. Review and enforcement of collection methods of data must be considered to ensure a positive impact on the quality or content of any information produced.
- **Timeliness**
Data should be recorded as close as possible to being gathered and should be accessed quickly and efficiently, in line with Data Protection legislation and guidance.
- **Validity**
Validity is supported by consistency over time, systems and measures; data must be collected, recorded and utilised to the standard set by relevant requirements or controls. Any information collection, use or analytical process must incorporate an agreed validation method or tool to ensure the standards and principles outlined above are met. Validation tools will support routine data entry and analysis, as well as supporting the identification and control of duplicate records and other errors.

5 Accountability and Responsibilities

There are a number of key information governance roles and bodies that Leeds CCG needs to have in place as part of its Information Governance Framework, these are:

- SIRO
- Data Protection Officer
- Governing Body
- Quality and Performance Committee
- Caldicott Guardian
- Information Asset Owner/Administrator
- Heads of Service/Department
- All employees

Within Leeds CCG there are formally documented structures of accountability for Data Quality:

- Every individual that is a registered user of a CCG Information Asset is responsible for ensuring the Data Quality of records when using the system. Should individuals knowingly enter data that breaches the previously described Data Quality standards there are disciplinary procedures that can be invoked.
- The SIRO has overall responsibility for data quality systems and processes in Leeds CCG. The SIRO is responsible for signing off any statement of assurance of clinical data quality.
- Managers are responsible for ensuring the quality of data within their teams, adhering to this policy and implementing any associated Data Quality Management Procedures.
- All staff have a responsibility to ensure the data they enter onto any system – electronic or manual is of good quality and follow Practice and local procedures for the validation of data.

Data quality is a key part of any Information Asset that exists within the CCG. All staff members will be in contact at some point with a form of Information Asset, whether paper or electronic. As a result, all staff members are responsible for implementing and maintaining data quality and are obligated to maintain accurate information legally (Data Protection legislation), contractually (contract of employment) and ethically (professional codes of practice).

It is the responsibility of all managers to ensure that, where appropriate, systems are in place to validate the completeness, accuracy, relevance and timeliness of data. Also managers must ensure that all staff are fully aware of their obligations in this area. In certain circumstances, to support

equality and diversity, line managers will need to consider individual requirements of staff to support good practice in complying with this policy.

Ultimate responsibility for maintaining accurate and complete data and information lies with the SIRO, but all staff who record information, whether on paper or by electronic means, have a responsibility to take care to ensure that the data is accurate and as complete as possible. Individuals with management responsibility for data quality must have this clearly stated in their job descriptions.

6 Training

The importance of data quality will be included in:

- Leeds CCG's mandatory training and induction programme.
General system training offered to all staff.

Training issues with systems and/or other specific processes should be addressed on an individual basis as they arise.

7 Process for Monitoring Compliance with this Policy

Data quality is ultimately the responsibility of department leads where the specific data are being generated. Processes for ensuring high data quality will differ between teams and should be implemented and reviewed locally.

8 Associated documents

This policy should also be considered in conjunction with all the policies and legislation, especially those listed below:

- Health records management procedure
- Confidentiality Code of Conduct
- Data Protection Procedure
- Information Governance Policy and Management Framework
- Risk Management Strategy and Policy
- Records Retention Schedule
- Records Management Policy