

Richmond Council and Wandsworth Council Data Quality Policy

Data quality is everyone's business

July 2022



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1. Introduction and Purpose

- 1.1 As a local government organisation we work with lots of data on a daily basis. The very nature of this, along with the opportunities presented by data, mean it is essential that we have confidence in our data – in its accuracy, and overall fitness for purpose. Our ambition to become a local government leader in data and analytics is reliant on having good quality data that can be used to inform effective decision-making, service design and delivery.
- 1.2 Data quality is not only needed for back-room analyses but is an integral part of our service delivery in ensuring we are providing the right services to the right people. For example, it helps ensure the correct letters, e-mails and texts are sent to residents, correct benefit payments are made, current tax bills are sent, and decisions on safeguarding are based on correct and complete information – to name a few. All in all, it is fundamental to the work Richmond and Wandsworth Councils do to provide quality services to our residents.
- 1.3 The SSA is committed to high standards of data quality. This policy has been developed in alignment with our data and analytics strategy of which data quality is a key pillar to help us build strong data foundations that will support opportunities for innovation and growth.
- 1.4 Whilst ‘perfect data quality’ may not exist, we must address the data quality challenges we are presented with as an organisation and strive to embed a culture of continuous improvement. Ultimately, we recognise the importance that high quality data has on helping us deliver improved outcomes for our residents. As an organisation we also have a legal requirement to ensure that the data we hold is accurate.
- 1.5 This policy has therefore been developed as part of a comprehensive approach to ensure that data is recognised, treated, and managed as key corporate asset that is fundamental to the SSA’s success.

Data quality is everyone’s business

2. Scope

- 2.1 This Data Quality Policy relates to all SSA data, whether this is held electronically or as physical records. This means any data that is collected, stored, and used in the running of our services. It applies to all aspects of the data lifecycle (see Appendix 1), including collection and retention, but does not cover presentation of analysed data, Key Performance Indicators (KPIs) etc. at this stage.
- 2.2 It covers our in-house services and systems, bought systems, contracted services, commissioned services. This policy is therefore expected to be reflected in contracts, commissioning and information sharing agreements. It should also be applied where external data processors are involved.

2.3 The policy provides an overarching corporate approach to data quality and sets out the SSA's aims to achieve and maintain good data quality and ultimately ensure our data is fit for purpose. In order to do this, we have outlined a number of data quality [principles](#). Also outlined are the [roles and responsibilities](#) for all staff across the organisation.

2.4 Data is everyone's business. We all interact with data in one way or another, whether we realise it or not, and so every member of staff has a part to play in ensuring good data quality. All staff should understand why data quality is important and feel confident in identifying, communicating, and addressing data quality issues. If you see an issue, or something that doesn't look quite right – fix it or raise the issue to someone who can.

2.5 The development of this policy has been closely aligned with the [Government Data Quality Framework](#) and as such represents a move towards a more consistent approach to managing data quality across the wider sector.

2.6 Please note that this policy should be read in conjunction with the following SSA policies and documents:

- [Data Protection Policy](#)
- [General Data Protection Regulation \(GDPR\) Guidance](#)
- [Information Governance Framework](#)
- [Information Security Policies and Guidance](#)
- [Records Management Policy](#)
- [Data and Analytics Strategy](#)

3. Context

What do we mean by data and data quality?

3.1 First and foremost it is important to define what we mean by 'data'. In this policy, and as in our Data and Analytics Strategy, we adopt the National Data Strategy (December 2020) definition which refers to **data as '*information about people, things and systems*'**.

3.2 Whilst individual items of data are often not that useful on their own, we can bring them together for analysis and draw conclusions (otherwise known as insights). This is where the real value is for us as an organisation – when we can translate this data into meaningful insights that can help us make decisions and take action.

3.3 In terms of data quality, at a high-level it can be thought of as 'fitness for purpose'. We must ask ourselves: is this data set good enough for what I want to use it for? The level of quality required will vary depending on the purpose but will often consider several dimensions (see [Data Quality Dimensions](#) below).

Why is good data quality important?

3.4 Data quality is fundamental to the effective operation of our organisation. Good quality data enables effective decision-making, the ability to understand to what extent we are meeting the needs of our residents and supports continuous improvement in the services we deliver. Good data quality also means that one person can pick up a case from another person (e.g. a social

worker) and understand the resident's needs and be able to provide them with appropriate services and support.

3.5 We also have a legal obligation to maintain good data quality, as outlined under the UK General Data Protection Regulation (UK GDPR). It states that personal data shall be 'accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay'.

3.6 The Local Government Transparency Code 2016 requires local authorities to publish certain data sets to enable public scrutiny. The code requires published data to be of high quality.

3.7 Here are some examples of what good quality data can help with:

Understanding our residents and their needs

- enables better informed and targeted interventions
- helps us get the right people the right support at the right time
- ensures residents are offered services they are eligible for

Effective decision-making, service planning and resource allocation

- ensures we have confidence in our decisions
- minimises risk

Evaluating effectiveness and efficiency of our services

- enables continuous improvement
- helps us provide the best possible service to our residents
- supports timely action

Increased productivity

- reduces time spent fixing errors and cleaning data
- leaves more time for gaining quality insight from data
- reduces time spent responding to information requests (FOIs etc)
- minimises unnecessary duplication of data sets

Emergency planning

- enables us to effectively support Borough emergencies (e.g. Covid, floods, heatwaves)

What are the risks/consequences of not addressing poor data quality?

3.8 On the other hand, the key risks arising from poor data quality are significant and can have a negative impact on the residents we serve and on the SSA as an organisation.

3.9 Poor data quality leads to poor decisions. Ultimately a decision can be no better than the information upon which it is based, so if critical decisions are taken based on poor-quality data, this can have very serious consequences.

3.10 Key risks associated with poor data quality include:

Flawed decision making

- decisions are based on inaccurate, misleading, or out-of-date information
- impacts our ability to deliver effective support and services to our residents
- may lead to poor outcomes for our residents

Weakened frontline service delivery

- residents are not given services they are eligible for
- inadequate/inappropriate services provided
- missed opportunities and failures in service provision
- slower service provision as workers chase down accurate details (e.g. correct phone number)

Poor use of resources

- valuable time has to be spent on fixing errors, instead of focusing on core duties
- errors or duplicates can lead to time being wasted contacting the wrong people, or even the same people multiple times

Vulnerable individuals not identified and left at risk

- failure to support residents most in need

Damage public trust

- poor quality data can damage our reputation and cause residents to lose the trust they have placed in us with regard to the information we hold about them
- residents may not receive important information from us

Could lead to breaches of legislation and regulations

- financial penalties
- damaged reputation and loss of trust

Undermine partnership working

- opportunities for working with partners cannot be maximised
- lack of common understanding

Here are some specific examples to help demonstrate the importance of data quality for the SSA:

- ❖ Incorrect data in our systems has meant council officers have had to spend time reviewing council assets, delaying work on making better use of our buildings and the services we can run out of them for residents. Without accurate and up to date information on Council assets such as trees, lampposts, bins, etc.. it is also impossible to log issues on behalf of customers and fix problems in a timely and efficient manner.
- ❖ Collection round numbers and collection days for waste and recycling are generated and held by the contractor. Errors in this data can cause collections to be missed and incorrect information being given to customers. This leads to complaints as well as wasted officer and contractor time.
- ❖ Where duplicate customer records are created, this can result in a variety of issues, for example, cases being missed and residents not receiving the support/service they need, or cases being logged multiple times which can lead to inefficiencies/wasted resources.
- ❖ If someone's phone number or address is wrong, you might not be able to contact them or worse... you could send someone's sensitive personal data to another person.
- ❖ If we do not correctly record a date of death, we may write to or continue to bill people who have passed away, causing distress and complaints, or continue to pay for services that are no longer needed.
- ❖ If information on our vulnerable residents is not correct, we may leave them at risk in emergency situations.
- ❖ If ethnicity data is not collected, this limits our ability to plan for culturally appropriate services or identify how certain groups may be affected by policy changes.

4. Policy Objectives

4.1 The development of this policy has been based on a number of objectives that the SSA aspires to achieve in terms of data quality. These include:

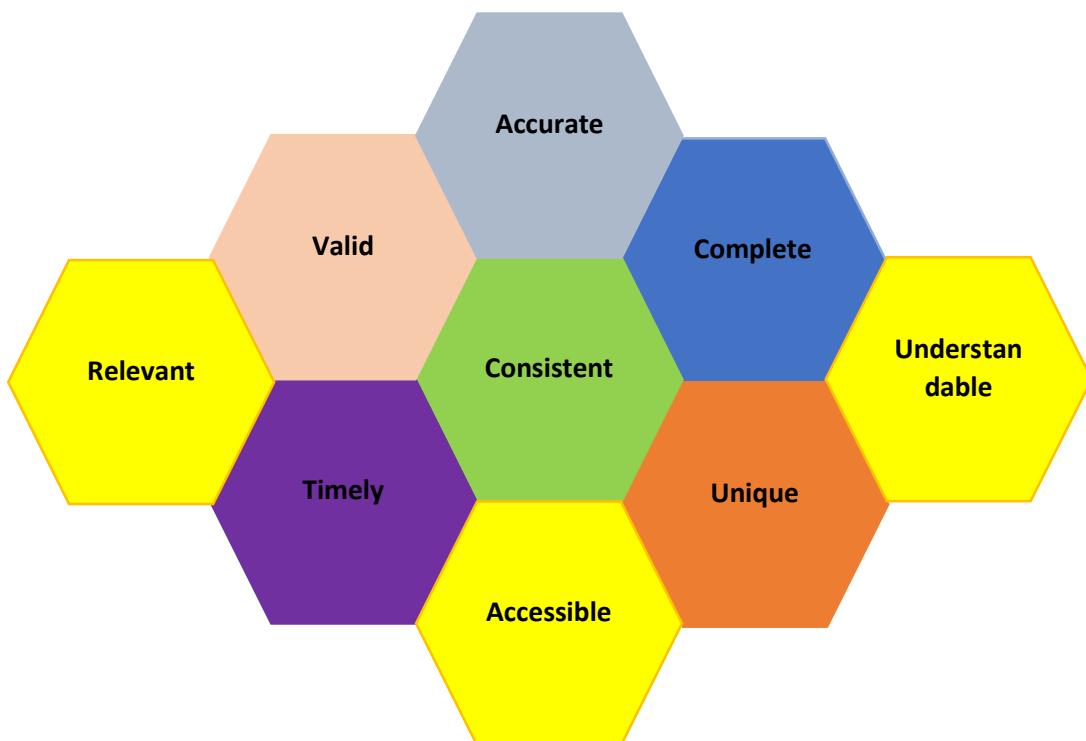
- Comply with our obligations under UK GDPR
- Ensure the information we hold meets the key data quality dimensions outlined below
- Ensure information is of high quality to provide client care, make key decisions, plan services, and make effective use of council resources
- Develop and embed an organisational culture that values high data quality
- Clarify roles and responsibilities for data quality
- Ensure that data collection follows SSA data standards
- Enable efficient partnership working through improved data quality
- Enable staff to thoroughly understand and effectively adopt data quality
- Implement data quality and data standards as part of procurement and commissioning processes

4.2 By adhering to this policy you are helping to achieve the SSA's data quality objectives.

5. Data Quality Dimensions

What does good quality data look like?

5.1 It is important to look at the dimensions of data quality. As an organisation we consider the following to constitute good quality data, in line with the [Government Data Quality Framework](#) and DAMA (Data Management Association) UK. The 3 dimensions in yellow have been added to the 6 recommended in the Framework, in order to reflect SSA priorities for data quality:



Find out what each of these mean below:

5.2 Complete – has all necessary parts, comprehensive

Completeness describes the degree to which records are present.

For a data set to be complete, all records are included, and the most important data is present in those records. This means that the data set contains all the records that it should and all essential values in a record are populated.

N.B. It is important not to confuse the completeness of data with its accuracy. A complete data set may have incorrect values in fields, making it less accurate.

e.g. Systems used to manage waste and recycling collections must use complete address datasets to ensure that the correct services are offered to all properties in the Borough otherwise properties will be missed leading to lower quality service and resident complaints.

5.3 Unique – not redundant or duplicated

Uniqueness describes the degree to which there is no duplication in records. This means that the data contains only one record for each entity it represents, and each value is stored once.

Some fields, such as National Insurance number, should be unique. Some data is less likely to be unique, for example geographical data such as town of birth.

e.g. A property has planning permission for conversion to two x 3 bed flats, and during construction a different planning permission is also granted for three x 2 bed flats. In theory either could be constructed, but on completion if the redundant permission is not removed from the database a total of five flats will be recorded. This shows the importance of informing users that some records in the data are not unique, and removal of duplicates is part of the production of finalised data.

5.4 Consistent – free from variation or contradiction

Consistency describes the degree to which values in a data set do not contradict other values representing the same entity. For example, a mother's date of birth should be before her child's.

Data is consistent if it does not contradict data in another data set. For example, if the date of birth recorded for the same person in two different data sets is the same.

e.g. A resident receives services from Adult Social Care and is also in receipt of benefits payments. The date of birth recorded has the same value and format in the Adult Social Care database as it does in the Benefits database.

5.5 Timely – current, early, or at right time

Timeliness describes the degree to which the data is an accurate reflection of the period that they represent, and that the data and its values are up to date.

Some data, such as date of birth, may stay the same whereas some, such as income, may not.

Data is timely if the time lag between collection and availability is appropriate for the intended use.

e.g. A school has emergency contact information for a child. A parent gives an updated emergency contact number on 1st June, however it takes several days/weeks to update this information. If an emergency arises before contact information has been updated, this could cause a serious issue.

5.6 Valid – in the range and format expected

Validity describes the degree to which the data is in the range and format expected. For example, date of birth does not exceed the present day and is within a reasonable range.

Valid data is stored in a data set in the appropriate format for that type of data. For example, a date of birth is stored in a date format rather than in plain text.

e.g. Social worker visits to children open to social care intervention capture the date the visit happened. A valid date will not be in the future and will be within the child's current episode of need. Invalid dates are those in the future or outside the child's need period, for example in a previous episode of need.

5.7 Accurate - free from error, conforms to truth or standard

Accuracy describes the degree to which data matches reality such as current address, correct NHS numbers, currently spelled name.

In a data set, individual records can be measured for accuracy, or the whole data set can be measured. Which you choose to do should depend on the purpose of the data and your business needs.

e.g. A school receives applications for its annual September intake and required students to be aged 5 before 31 August of the intake year. The system stores dates in multiple formats and one of the students' Date of Birth (DOB) is stored in the US date format (MM/DD/YYYY rather than DD/MM/YYYY). The student is accepted in error as the DOB given is 09/08/YYYY rather than 08/09/YYYY. The representation of the student's DOB – whilst valid in its US context – means that in the UK the age was not derived correctly, and the value recorded was consequently not accurate.

5.8 As outlined above, as well as the above six core data quality dimensions recognised in the Government Data Quality Framework, we also think the following are important characteristics of data quality:

5.9 Accessible – available and easily obtained

Accessibility refers to the degree to which people in the organisation can use data. This means information that is readily available, easy to locate, and usable for its intended users.

This is not just limited to those working within a service being able to access that data for that service. For residents and clients, we are one organisation that serves them. As such the SSA has many public duties where data needs to be shared between services to carry out a task, plan for the future etc. For example, Electoral Services rely on being able to access data from Council Tax, Benefits, Parking, and all other Council services in order to maintain an up to date Electoral Register. Customer Services need access to specific systems (e.g. Parking, Council Tax etc.) to be able to serve clients coming into the Council or calling to get permits or pay bills.

A key part of accessible data is ease of access that enables delivery of planned tasks. The barriers to access should not be so high that it makes data effectively inaccessible. Making data accessible means having a clear and easy way to access data where legally permitted.

e.g. Children's centres in Wandsworth are required to ensure that discussions are held with social workers of all children known to social care aged under five to ensure appropriate services are offered. Accessible data in this instance refers to Children's Centres being able to access relevant children aged under five who are known to social care but who are not yet registered or accessing Children's Centre services. The data should have enough information to ensure effective action can be taken to offer services to these children.

5.10 Relevant – applicable, usable, useful

Relevance describes the degree to which data captured is relevant to the purposes for which it is being used. In other words, there must be a good reason as to why the data is being collected in the first place. Uses are often not just limited to the work of an individual service as residents may be getting services from other parts of the Councils. Wider needs therefore need to be considered as part of relevant data.

Usable means that it is collected in a way that enables reuse and makes it relevant for ongoing service delivery. This includes format of data collection, following data standards and how data are stored.

Useful data have been collected at the level needed e.g. if street address is needed post code will not suffice and if detailed age breakdown is needed for planning, it is not sufficient to have higher level categories such as over or under 18.

E.g. A service users' personal demographics (for example race, age, disability, gender) is collected, as part of care and support planning work, and shared with service providers to help them provide the right level of support and care to service users.

5.11 Understandable – clear and unambiguous

Understandable refers to being able to look at the information and know what it is. It encompasses how the data was collected, the limitations of data, metadata, for example. Understandable data speeds up service delivery and analyses as users do not need to investigate what each field is. It also ensures correct service delivery and helps avoid mistakes.

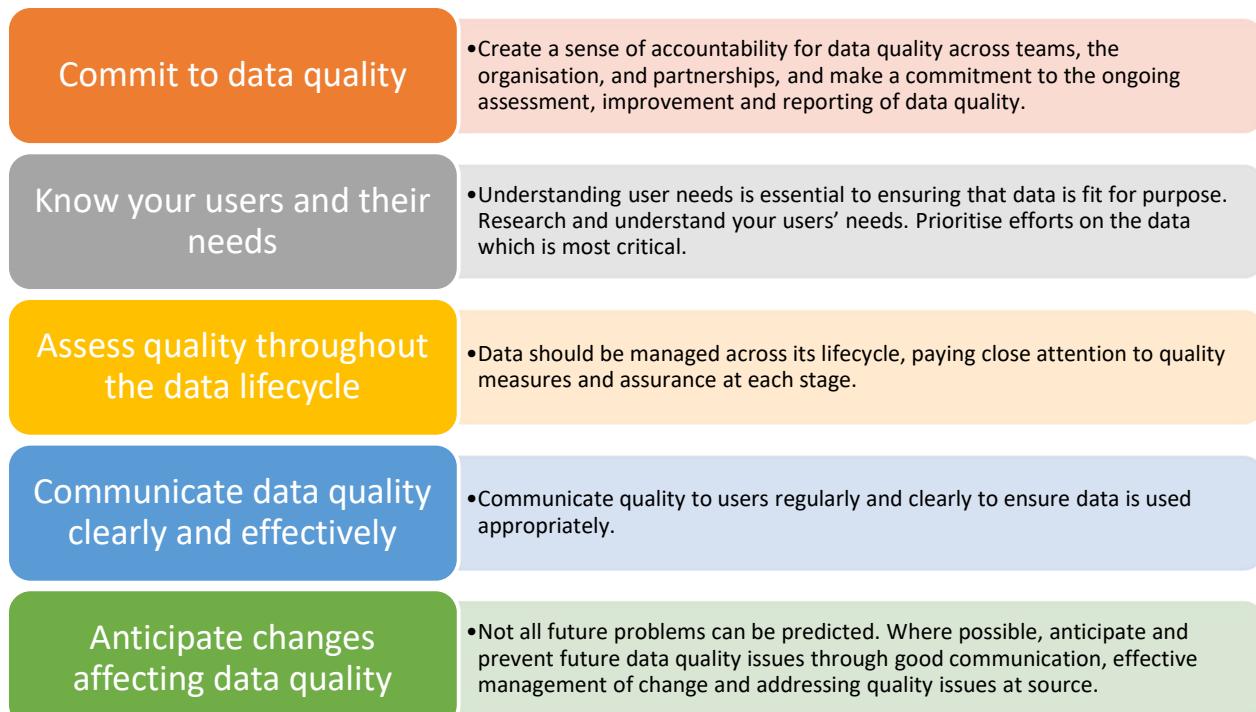
Many of the Councils' data sources have been around for decades and relationships with clients could also go on for decades. During that period there may be many changes to the data to reflect policy changes (e.g. introduction of Universal Credit), operational changes and technological changes (e.g. new case management system). These changes and their impact need to be captured in data documentation.

Metadata (data that provides information about other data) is essential in ensuring that information is used correctly. In databases, data is stored as numbers e.g. numbers for each ethnic group. Without effective metadata, it would not be possible to determine what each number means.

E.g. An analysis is planned to determine eligibility for a new type of benefit for most vulnerable residents. The plan is to target support to those getting a combination of existing benefits as they would be most vulnerable. Without clear information in the database on what each grant type means, date types mean etc. it would not be possible to determine eligible individuals or would take much longer to do the analyses as several people will need to be contacted to clarify each data field.

6. Data Quality Principles

- 6.1 We have adopted the data quality principles outlined in the [Government Data Quality Framework](#).
- 6.2 These principles are at the heart of our approach to data quality and will aid the creation of a strong data quality culture right across the SSA.
- 6.3 The principles explain the best practice, procedures and attitudes that will help us ensure our data is fit for purpose. The principles are:



6.4 More information on the above data quality principles can be found in the [Government Data Quality Framework](#).

6.5 More detailed information on the data lifecycle is also available in Appendix 1.

7. Data Standards

7.1 The SSA is committed to collecting and processing data according to national, or where these are not available, locally defined standards.

7.2 The formal list of SSA Data Standards is being developed and these standards are expected to be applied to all data that is used by the SSA, shared externally, or provided by a third-party organisation.

7.3 Adhering to these standards will help ensure that our data is fit for purpose and can be used with a high degree of confidence.

8. Partnership working and data sharing

8.1 A key element of partnership working is the act of sharing data. The SSA receives data from partners, and we also share data with them. However, all external data sharing activities must be underpinned by a Data Sharing Agreement in line with the SSA's policies on Data Protection and Information Security. The data quality principles outlined above extend to all data sharing and contracting arrangements and are therefore expected to be applied as such.

8.2 Data quality must be included as a crucial part of these Data Sharing Agreements. For any services that are outsourced, contracts must include specific data quality standards and very

clearly set out requirements in terms of data being collected and maintained on behalf of the SSA.

9. Monitoring and Review

- 9.1 Yearly audits are to be undertaken. Process is to be determined and developed by services, at which point further detail will be added to this policy.
- 9.2 Data quality metrics and KPIs will be developed, and services will be expected to monitor, assess, and report on them on an ongoing basis. Once developed, further detail will be added to this policy.

10. Roles and Responsibilities

- 10.1 Data quality is everyone's responsibility, as poor data quality can occur at any stage of interaction with data.

Role	Responsibility
All staff	<ul style="list-style-type: none"> • Adhere to this policy and understand its relevance to your day-to-day activities • Be aware of the importance of good data quality and the implications that poor data quality can have for the SSA • Ensure you handle data responsibly • Make every reasonable effort to ensure good data quality throughout the data lifecycle • Report data quality issues to your line manager • Fix mistakes/provide updates where you see them (e.g. phone number, names, addresses)
Team Manager	<ul style="list-style-type: none"> • Raise awareness of this policy within your team and ensure understanding and compliance • Drive data quality improvement within your team and ensure staff understand their own responsibilities • Ensure the data quality of the systems within your team • Regularly review compliance with this policy within your team
Head of Service (in many cases the Data Controller)	<ul style="list-style-type: none"> • Raise awareness of this policy within your service area and set expectations for quality data • Drive data quality improvement across your service area and ensure staff understand their own responsibilities • Ensure the data quality of the systems within your service area • Manage the risks associated with data quality • Regularly review compliance with this policy within your service area and work to understand and rectify any non-compliance • Carry out regular data quality reviews and implement actions to address any issues or potential risks identified
Director	<ul style="list-style-type: none"> • Maintain overall quality of data within your directorate • Ensure data quality dimensions are met and principles are implemented • Lead on data culture across your directorate • Ensure the delivery of an effective organisation-wide information governance approach (including data quality)

Role	Responsibility
Data Quality and Standards Subcommittee	<ul style="list-style-type: none"> • Act as data quality champions • Lead on development of processes and plans to improve SSA data quality • Feed into the development of data quality measures • Feed into the development and regular reviews of the data quality policy
Information Governance and Security Forum (IGSF)	<ul style="list-style-type: none"> • Provide feedback on data quality measures and policies and ensure all necessary considerations have been made
Information Governance Strategic Board (IGSB)	<ul style="list-style-type: none"> • Approve all data quality measures and policies
Data Protection Officer (DPO)	<ul style="list-style-type: none"> • Advise, monitor, and report Councils' compliance with GDPR, including data quality
Caldicott Guardian	<ul style="list-style-type: none"> • Responsible for protecting the confidentiality of people's health or care information and making sure it is used properly • Ensure that the Councils adhere to the Caldicott Principles and the National Data Guardian standards which underpin the need for high quality data for coordinated, effective and efficient care
Internal Audit	<ul style="list-style-type: none"> • Contribute to the development of effective data quality arrangements, through providing a review/assurance service that comments on whether our policies and processes in relation to data quality are being followed, and that the controls within these are sufficient to achieve our objectives within the level of agreed risk appetite • Support the monitoring process as part of internal audits

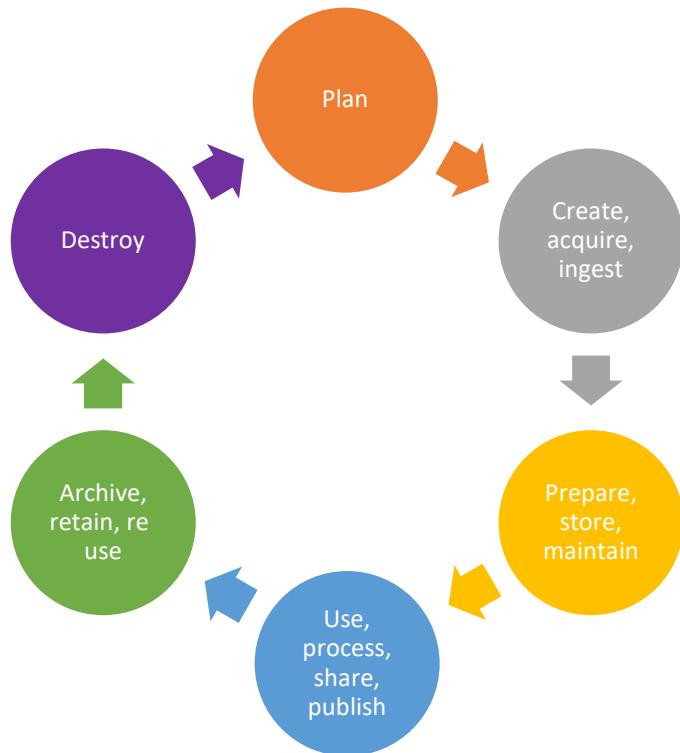
Appendices

Appendix 1: Data Life Cycle

The data lifecycle is a way of describing the different stages that data will go through, from collection to dissemination and archival/destruction. The purpose of the data and its lifecycle should be well understood by anyone who handles the data, from its collection to the eventual output.

Each stage of the cycle is important. Often there is a focus on collection and current use, but during the planning stage not enough thought is given to storage, maintenance, wider SSA needs and information governance obligations such as retention schedules and data access and sharing.

Every member of staff in the SSA has data responsibilities so improving our use of data has to be a joint effort.



Stage of the Lifecycle	What does this mean in practice?
Plan	Description of the data that will be compiled, and how the data will be managed and made accessible throughout its lifetime.
Create, acquire, ingest	Data is entered into systems or generated in several ways, either manually or automatically. Ingestion refers to automation processes which bring data from outside into systems.
Prepare, store, maintain	Data is prepared for storage, formatted for use at further stages in the data lifecycle and maintained for use within the organisation. Data may also be integrated into organisational data stores.
Use, process, share, publish	Data is processed and used for the specified business needs. This may involve exploration and analysis of the data, as well as

Stage of the Lifecycle	What does this mean in practice?
	production of outputs. Data is shared or published where it is appropriate for processing for secondary purposes.
Archive, retain, re-use	Once data is no longer in active use, it should be safely and securely archived in line with the organisation's data retention policies or legal requirements. This retains the data for future use if required within specified timescales.
Destroy	Following archiving or if no longer needed at an earlier stage in the cycle, data must be destroyed securely and in line with the organisation's data destruction policies and procedures.

Acknowledgements

This Data Quality Policy has been heavily based on and influenced by the [Government Data Quality Framework](#) and *Tower Hamlets Data Quality Framework (including data quality policy)*. Sections have been lifted and appropriately adapted where needed to reflect the ambitions of the SSA and the way in which we work as an organisation.