Data Quality Policy

October 2013

Version No: 0.17
Status: Approved by Directorate on 4 November 2013
Date: 30/10/2013
Introduction

The data landscape of HE has changed, with new initiatives such as the Key Information Set (KIS) being reliant on the quality of data that institutions submit through external returns. In recent years, HEFCE has highlighted the importance of good data through the Financial Memorandum, which redefines the role of governors.

The University recognises the obligations it has to manage data in accordance with the requirements of the Data Protection Act (1998), the Freedom of Information Act (2000) and the HEFCE financial memorandum.

In the most recent Financial Memorandum, HEFCE defines the governing body as

*The governing body of an institution is collectively responsible and has ultimate non-delegable responsibility for overseeing the institution's activities, determining its future direction and fostering an environment in which its mission is achieved. In accordance with the institution's own statutes and constitution, there should be effective arrangements for providing assurance to the governing body that the institution:

- has effective arrangements for the management and quality assurance of data submitted to HESA, HEFCE and other funding bodies (we reserve the right to use our own estimates of data where we have reason to believe institutional data are not fit for purpose). Responsibility for the quality of data used for internal decision making and external reporting, which must be fit for purpose, rests with the institution itself. Data submitted for funding purposes must comply with directions published by HEFCE; if in doubt institutions should ask their HEFCE regional consultant to provide an authoritative, written ruling

In the same document, the Audit Committee role is highlighted as:

*The audit committee annual report must include the committee’s conclusions on the adequacy and effectiveness of the HEI’s arrangements for the following:

- management and quality assurance of data submitted to HESA and to HEFCE and other funding bodies. This latter assurance is to ensure adequate governance oversight of the systems used to generate funding data by the HEI, since poor data may represent a significant financial risk for HEIs that audit committees need to consider

The accountable officer (the Vice-Chancellor) has to sign an annual accountability return which confirms that:

*This is to confirm that the data and annual accountability returns submitted to HEFCE conform to the requirements of the Financial Memorandum and published guidance. The data have been subject to effective oversight and management review. Quality assurance has been provided to the audit committee, which in turn has been able to provide assurance to the governing body and myself as accountable officer.

Purpose

The University needs high quality data to support effective decision-making and to ensure compliance with external funding guidance.

The University is committed to the highest standards of data quality and to ensuring the accuracy and completeness of all data as far as is reasonably practicable.
It is the responsibility of every member of staff of the University to ensure that all data within their area of responsibility is accurate and complete, appropriately coded in compliance with University requirements, and properly managed and maintained.

Systems and processes will work on the principle of right first time rather than extensive data correction.

Attention is drawn to two useful external reports on data management:

an Audit Commission report on improving information, which can be found here: http://www.wao.gov.uk/assets/englishdocuments/ImprovingInformationToSupportDecisionMaking.pdf

and a report by PWC for HEFCE on data quality, which can be found here: http://www.hefce.ac.uk/pubs/rdreports/2008/rd19_08/

Scope and Definitions

This Policy covers all data that is held in University-wide systems, and any data that is collected from those systems and used for internal or external reporting. It does not cover data held by the University where the data owner is a third party, such as student coursework or research data.

Data is defined in the Audit Commission report as numbers, words or images that have yet to be organised or analysed to answer a specific question.

Good data quality is defined in the same report by seven characteristics:

1. 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

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

3. 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

4. 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
5. 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

6. Completeness

- Data should be complete
- Data should not contain redundant records e.g. modules that are no longer delivered.

7. Compliance

- Data must comply with regulations on data protection and data security

Roles and responsibilities

Every member of staff of the University has a role to play in the improvement of data quality. However, certain University committees and officers have a particular responsibility for the active management of data. A statement of key roles and responsibilities is set out below.

Roles and responsibilities in relation to data quality will be clearly defined and documented and where appropriate incorporated into job descriptions.

Audit Committee

The Audit Committee is responsible, under the terms of the Financial Memorandum, for assuring the quality of data submitted to external bodies such as HEFCE and HESA.

Vice-Chancellor

The Vice-Chancellor is the Accountable Officer of the University. This responsibility cannot be delegated. The Vice-Chancellor signs the annual assurance returns, which include the following statement on the accurateness of the data submissions:

‘The data have been subject to effective oversight and management review. Quality assurance has been provided to the audit committee, which in turn has been able to provide assurance to the governing body and myself as Accountable Officer.'

Deputy Vice-Chancellors/Chief Operating Officer

The Vice-Chancellor receives internal assurance on the quality of data submitted from the Deputy Vice-Chancellors/Chief Operating Officer.

Registrar

The Registrar has overall responsibility for the accuracy and completeness of student and curriculum data. Further details are set out in Appendix F. This responsibility is discharged through a number of professional services departments.
Director of Human Resources

The Director of Human Resources has overall responsibility for the accuracy and completeness of data held within the HR system.

Director of Finance

The Director of Finance has overall responsibility for the accuracy and completeness of data held within the Finance system.

Deans

Deans are responsible for promoting a culture of high data quality and for ensuring that the academic community provide key data in a timely manner where required.

Skills

The University will put in place arrangements to ensure that staff have the knowledge, competencies and capacity for their roles in relation to data quality. These arrangements will comprise:

- delivering a programme of training to staff who work with the Student Records System;
- ensuring that all staff have access to policies, guidance and support on data quality via the University intranet site;
- providing regular updates for staff, to ensure that changes in data quality procedures are disseminated and acted upon;
- providing feedback to staff in relation to exception reports that are generated with very high levels of inconsistencies, with an action plan targeted to areas that have a high level of data quality issues.

Sign-off and monitoring

It is important that the University can provide the Audit Committee with evidence of sources of assurance on the underlying quality of data. There are three forms contained within the appendices to this document. It is intended that these should be completed on an annual basis and submitted to SPMI.

Appendix A contains the sign-off form for Faculty SAS managers
Appendix B contains the sign-off form for return compilers
Appendix C contains the sign-off form for system owners
Appendix D contains the external return register

A set of data quality indicators will be developed and be monitored on quarterly basis by the Executive.

The Data Quality Policy will be reviewed annually.
Appendix A - Sign-off for data quality from data owners (to be completed annually, in September)

Manchester Metropolitan University - Data Assurance Form

Head of Faculty SAS, Name .................................................................

HEFCE has a requirement for Manchester Metropolitan University to confirm that it has effective arrangements for the management of and quality assurance of data submitted to the Higher Education Statistics Agency, HEFCE and other funding bodies. This includes, but is not limited to, financial, student, module, programme, space, business and research data.

I certify that for my area of responsibility:

• relevant University policies and procedures, including the Data Quality Policy, have been implemented;
• good data quality principles are encouraged and there is a commitment to secure a culture of data quality;
• arrangements are in place to ensure that staff have the knowledge, competencies and capacity for their roles in relation to data quality.

2. Any material issues within my area of responsibility which may prevent you from making an unqualified confirmation to HEFCE are listed below:

<table>
<thead>
<tr>
<th>Item:</th>
<th>Target date for full compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

Please note that these forms will be relied on as a source of assurance for the Audit Committee
Signed ................................................................. Date.................................
Appendix B - Sign-off structure for statutory returns

To: The Vice-Chancellor

From:
HESA Finance, TRAC
HESA Staff
HESA Student, HESES
HEBCIS
EMS

As Head of ......................................................... (service) I confirm that the data for the ................................................. return has been checked prior to submission, all queries and internal validation checks have been investigated and to the best ability of this section, I confirm that this submission is complete and correct.

<table>
<thead>
<tr>
<th>The following items require further work to meet full assurance standards:</th>
<th>Target date for full compliance</th>
</tr>
</thead>
<tbody>
<tr>
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</tr>
</tbody>
</table>

Please note that these forms will be relied on as a source of assurance for the Audit Committee

Signed ......................................................... Date.........................................
Appendix C – Sign-off structure for University Data Systems

To: The Vice-Chancellor

From: Human Resources, Finance and Legal, SAS, Services Group

As Head of .................................. (service) I confirm that the data for the ................................................. data management systems have been maintained in a consistent manner that complies with the requirements for good governance of the data they contain.

All queries have been investigated and to the best ability of this section, I confirm that this structure is fit for purpose.

<table>
<thead>
<tr>
<th>The following items require further work to meet full assurance standards:</th>
<th>Target date for full compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

Please note that these forms will be relied on as a source of assurance for the Audit Committee

Signed ........................................................................ Date..............................................
## Appendix D  MMU returns register

<table>
<thead>
<tr>
<th>Submission Date</th>
<th>Return name</th>
<th>Responsible officer</th>
<th>Return type</th>
</tr>
</thead>
<tbody>
<tr>
<td>15&lt;sup&gt;th&lt;/sup&gt; September</td>
<td>Student HESA - First data insert deadline for Student HESA return.</td>
<td>Head of SPMI</td>
<td>student</td>
</tr>
<tr>
<td>22&lt;sup&gt;nd&lt;/sup&gt; September</td>
<td>Student HESA - First error free Commit deadline for Student HESA return.</td>
<td>Head of SPMI</td>
<td>student</td>
</tr>
<tr>
<td>30&lt;sup&gt;th&lt;/sup&gt; September</td>
<td>HR HESA - First data insert deadline for HR HESA return.</td>
<td>Director of HR</td>
<td>staff</td>
</tr>
<tr>
<td>October</td>
<td>SLC</td>
<td>Finance Director</td>
<td>Financial/student</td>
</tr>
<tr>
<td>October</td>
<td>TDA return</td>
<td>Head of SPMI/Dean of IoE</td>
<td>student</td>
</tr>
<tr>
<td>October</td>
<td>Overseas student return</td>
<td>Head of SPMI</td>
<td>student</td>
</tr>
<tr>
<td>Nov</td>
<td>FE return</td>
<td>Head of SPMI/Dean of AD</td>
<td>student</td>
</tr>
<tr>
<td>Nov</td>
<td>Estates management return</td>
<td>Director of Services</td>
<td>estates</td>
</tr>
<tr>
<td>Dec</td>
<td>HESES</td>
<td>Head of SPMI</td>
<td>student</td>
</tr>
<tr>
<td>Dec</td>
<td>HESA FSR and HEBCIS</td>
<td>Finance Director</td>
<td>financial</td>
</tr>
<tr>
<td>Jan</td>
<td>TRAC return</td>
<td>Finance Director</td>
<td>financial</td>
</tr>
<tr>
<td>Feb</td>
<td>TRAC for T</td>
<td>Finance Director</td>
<td>financial</td>
</tr>
<tr>
<td>April</td>
<td>DHLE</td>
<td>Director of Student Services</td>
<td>student</td>
</tr>
<tr>
<td>Annual</td>
<td>OFFA</td>
<td>Registrar</td>
<td>Financial/student</td>
</tr>
<tr>
<td>Quarterly</td>
<td>SHA</td>
<td>Dean of HPSC</td>
<td>student</td>
</tr>
</tbody>
</table>

Please note this is not a complete list and will be updated when necessary

### Key to terms:

FE – Further Education (to include returns to YPLA (Young Peoples Learning Alliance) and SFA (Skills Funding Agency))
SHA strategic health authority

HESA – Higher Education Statistics Agency

TDA – Training and Development Agency

ITT – Initial Teacher Training

HESES – Higher Education Students Early Statistics Survey
Appendix E - Core systems, underpinning processes and supporting technical infrastructure

The University must have in place core systems, processes that underpin the operation of those core systems, and supporting technical infrastructure that in combination are capable of securing the quality of data as part of the institution’s normal business activity. Key features of these arrangements, which derive from the seven characteristics of good data quality, are:

- that systems and processes should work according to the principle of right first time, rather than employing extensive data correction, cleansing or manipulation processes to produce the information required;

- that where possible, core systems should have built-in controls to minimise the scope for human error or manipulation and prevent erroneous data entry, missing data or unauthorised data changes;

- that there must be validation and verification procedures in place that ensure the consistency and completeness of data.

The tables below show the core systems, processes and technical infrastructure that are in place in the University, and the Executive-level owners of each.

<table>
<thead>
<tr>
<th>Core systems</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student Records System</td>
<td>Director of Services</td>
</tr>
<tr>
<td>SAP Finance, Payroll</td>
<td>Director of Finance</td>
</tr>
<tr>
<td>SAP HR</td>
<td>Director of Finance</td>
</tr>
<tr>
<td>Timetabling System</td>
<td>Registrar</td>
</tr>
<tr>
<td>Student portal and MOODLE</td>
<td>Director of Services</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Processes that underpin the operation of core systems</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student Records System</td>
<td>Registrar</td>
</tr>
<tr>
<td>SAP Finance, Payroll</td>
<td>Director of Finance</td>
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<tr>
<td>SAP HR</td>
<td>Director of HR</td>
</tr>
<tr>
<td>Timetabling System</td>
<td>Registrar</td>
</tr>
<tr>
<td>Student portal and MOODLE</td>
<td>Director of Services</td>
</tr>
<tr>
<td>Supporting infrastructure</td>
<td>Owner</td>
</tr>
<tr>
<td>--------------------------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>Student Records System</td>
<td>Director of Services</td>
</tr>
<tr>
<td>SAP Finance, Payroll</td>
<td>Director of Finance</td>
</tr>
<tr>
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<td>Director of Services</td>
</tr>
<tr>
<td>Student portal and MOODLE</td>
<td>Director of Services</td>
</tr>
</tbody>
</table>
Appendix F – The student and curriculum data management responsibilities of the Registrar

The Registrar is responsible for ensuring that:

(i) there is a comprehensive curriculum data structure in place and that this structure is correctly represented within the University’s core systems infrastructure;

(ii) appropriate and accurate data on applicants and students is held within the University’s core systems infrastructure;

(iii) the relationship between students and all parts of the curriculum data structure is accurate and correctly represented within the University’s core systems infrastructure;

(iv) changes to curriculum data structures, to applicant and student data, and to the relationships between the two, are made in accordance with approved processes and in a timely manner;

(v) student and curriculum data is reportable for a broad range of internal and external purposes, which include the statutory returns that the University is required to make;

(vi) student and curriculum data is assurable, by maximising the number of direct relationships between different data elements and ensuring that related data fields are completed;

(vii) legal and regulatory requirements relating to the collection, management and reporting of student and curriculum data are adhered to;

(viii) student and curriculum data management processes are appropriately documented and responsibilities for the various aspects of student and curriculum data management are identified and communicated effectively within the University.