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Data Quality Policy

1.0 DATA QUALITY STATEMENT

1.1 Bournemouth University is committed to maintaining high standards of data quality to ensure data is accurate, reliable, timely and relevant. The importance of data both to meet statutory requirements and reporting internal performance is recognised and the University aims to support a culture of valuing high quality data.

2.0 PURPOSE

2.1 The purpose of the Data Quality Policy is to set out the procedures and processes that are required in order to ensure that good quality data is derived, reported and returned as appropriate. The policy has been benchmarked against relevant sector research and good practice.

2.2 Key characteristics of good quality data according to the Audit Commission paper *Improving Information to Support Decision Making: Standards for Better Quality Data* (2007) and the Government Data Quality Hub paper *The Government Data Quality Framework* (2020) include:

- **Accuracy** – Data should be sufficiently detailed for the purposes for which they are collected, represent the associated activity clearly, and be captured once only as close to the point of activity/interaction as possible;
- **Validity** – Data should be collected and used in compliance with internal and external requirements, to ensure consistency and that they appropriately reflect what they are intended to measure;
- **Reliability/Consistency** – Data should be collected and processed consistently and in accordance with defined processes to ensure that any changes in data are genuinely reflective of the activities represented;
- **Timeliness** – Data should be collected as promptly as possible after the associated activity and be available for use within a reasonable timeframe;
- **Relevance** – Data collected should be relevant for the purposes for which they are obtained;
- **Completeness** – Data should be complete and as comprehensive as necessary to provide an accurate representation of the activity concerned and meet the information needs of the institution;
- **Uniqueness** - Data contains only one record for each entity it represents, and each value is stored once.

2.3 Specific to Bournemouth University data quality is important in order to fulfil the following requirements:

- Provide external returns for funding purposes so that appropriate funding is secured;
- Provide external returns to other statutory bodies for regulatory, legal and governance purposes;
- Provide external returns for institutional performance purposes ensuring optimal performance in any league tables;
- Produce appropriate and accurate business intelligence and management information to inform institutional planning and decision-making;

- Meet its obligations to process personal data in accordance with the rights of data subjects under the terms of the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA 2018) (as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020);
- Ensure that information requested pursuant to the Freedom of Information Act 2000 is accurate, appropriate, and accessible;
- Meet its obligations under equalities and safety legislation.

3.0 SCOPE

- 3.1 The scope of this policy covers all data held by the University whether on a University system or in manual form. It also covers the data used from these systems to inform analysis and reporting, whether internal or external.
- 3.2 Other data such as individual or team based research data is not covered by this policy but is nevertheless important and is covered elsewhere in the University by the appropriate procedures and policies such as the [‘Research Data Policy’](#) and the [‘BU code of Good Research Practice’](#).
- 3.3 Whilst data security and confidentiality are both important aspects of protecting the quality of data these are dealt with in accordance with the UK GDPR and DPA 2018 through the University Policies, [‘Information Security’](#), [‘Confidential Information and the Data Protection Act 2018’](#), and [‘Acceptable Use Policy’](#).

4.0 ROLES, OBJECTIVES AND RESPONSIBILITIES

- 4.1 A number of staff at the University have responsibility for data processing, handling and reporting. In order to identify the different levels of responsibilities staff can be grouped into:
- **Data Guardians:** Those who have overall responsibility for institutional data and/or independent verification of external regulatory and legally required data returns made by the University.
 - **Data Managers:** Staff with primary management responsibilities for areas of institutional data including data collation, data processing and derivation, data reporting and external regulatory and legally required data returns.
 - **Data Users:** employees of the University who process, access and report on Institutional data in order to carry out the duties of their role.
- 4.2 The University’s Data Quality Policy objectives and corresponding responsibilities are set out as follows:
- 4.2.1 To maintain and further develop documentation and procedures to ensure processes are in place for data to be checked regularly and collated robustly.
- It is the responsibility of **Data Guardians** to ensure appropriate standardised processes and procedures are set with the **Data Managers**, ensuring the key characteristics of good quality data set out in the Data Quality Policy are adhered to.
 - **Data Managers** should ensure that all such procedures are fully adopted and subsequently complied with in the context of working practices.
 - It is the responsibility of the **Data Users** to ensure processes and procedures are understood and followed.
- 4.2.2 To ensure processes continue to be fit for purpose through regular review.
- Processes will be subject to annual review by the PRIME team.
 - It is the responsibility of the **Data Managers** to ensure that processes are fit for purpose through regular review.
- 4.2.3 To ensure that data and high-quality management information is effectively embedded in reporting requirements both executively and deliberately within the University.

- It is the responsibility of **Data Managers** to ensure data is robust and certified for use in management information.
- It is the responsibility of the **Data Users** who provide management information to ensure they are objective, thorough and rigorous when working with data.

4.2.4 To support a culture of valuing high quality data.

- The **Data Guardians** and **Data Managers** will demonstrate a high commitment to data quality at senior level. It is the responsibility of the **Data Guardians** and **Data Managers** to ensure this commitment is fostered throughout the University.
- It is the responsibility of the **Data Guardians** and **Data Managers** to promote to all staff the internal and external requirements for University data to be of good quality, so that staff understand how they can contribute towards achieving this objective.
- It is the responsibility of the **Data Guardians** and **Data Managers** to ensure all **Data Users** are aware of data quality requirements in respect of their own areas of work and understand how inaccuracies in such data might adversely impact on both the work of their department and that of the wider University.

4.2.5 To ensure that all data is verified so that it is accurate (in terms of correctness), valid (in an agreed format which conforms to recognised standards), reliable (reflects consistent processes), timely (available when needed), relevant (in terms of the purpose(s) it is to be used for) and complete (in terms of all data being captured).

- **Data Guardians** are responsible for ensuring that the requirements set out in the Data Quality Policy are consistently adopted across the institution and for ensuring all external regulatory and legally required data returns are independently verified.
- **Data Managers** are responsible for ensuring that arrangements for data processing, derivation, and data reporting are integrated into processes, supporting the day-to-day work of staff, and focused on securing data which are accurate, valid, reliable, timely, relevant, and complete.
- **Data Managers** are responsible for ensuring that information systems are appropriately integrated wherever possible, to minimise unnecessary duplication of data processing.

5.0 GOVERNANCE AND ACCOUNTABILITY

5.1 The OfS (Office for Students) Regulatory Framework places the following responsibilities relating to the management, provision, and quality assurance of data on the Governing Body:

- Condition F3 - For the purpose of assisting the OfS in performing any function, or exercising any power, conferred on the OfS under any legislation, the governing body of a provider must [...] Provide the OfS, or a person nominated by the OfS, with such information as the OfS specifies at the time and in the manner and form specified.
- Condition F4 - For the purposes of the designated data body (DDB)'s duties under sections 64(1) and 65(1) of HERA, the provider must provide the DDB with such information as the DDB specifies at the time and in the manner and form specified by the DDB.
- Condition E2 - The provider must have in place adequate and effective management and governance arrangements to [...] Continue to comply with all conditions of its registration.

5.2 In addition the 'Terms and conditions of Research England grant' (RE-P-2023-03) which took effect from 1 August 2023 place the following responsibilities relating to the management and quality assurance of data on the Governing Body;

- Para 30 – The accountable officer is personally responsible to the governing body for ensuring compliance with the terms and conditions in this document and for providing Research England with such assurances of this as it may require.
- Para 76 - Higher education providers are required to supply Research England with data to inform allocations of funding and for other purposes. The responsibility for the quality and accuracy of that data

rests with the higher education provider. Research England relies on the provider's own data assurance processes where possible. To ensure the quality and accuracy of the data, we expect HEPs to undertake an internal audit review of the data approximately every 5 years, along with a review of the systems and processes used for the compilation of the data.

- Para 80 - Research England will place reliance on providers' compliance with the OfS's ongoing conditions of registration in relation to the provision of accurate data (conditions F3 and F4).

5.3 The Higher Education Audit Committees Code of Practice (CUC 2020-06) states;

- Para 11 – success for HEIs is built on a foundation of sound governance and financial and reputational sustainability. This requires robust internal controls, including arrangements for securing [...] management and quality assurance of data submitted to the Higher Education Statistics Agency, the Student Loans Company, the OfS and Funding Councils, Research England, and other bodies;
- Para 44 – The [audit committee annual] report should include the committee's opinion of the adequacy and effectiveness of the institution's arrangements for [...] quality of data submitted to regulatory bodies.

5.4 The Head of PRIME and the PRIME Manager (Corporate Planning & Insight) will be responsible for reviewing the Data Quality Policy on an annual basis, ensuring it is fit for purpose as well as ensuring consistent methods of adoption across the institution.

5.5 They will also ensure that the Data Quality Review process is robust, relevant, and fit for purpose. This process is required for all external regulatory and legally required data returns (as per Appendix).

5.6 The Data Quality Review sets out to ensure external regulatory and legally required data returns are coordinated, verified, and return robust and accurate information. Data Quality reviews are confirmed by the Finance Director prior to any sign off by the Vice-Chancellor. A summary of these reviews is reported to Audit, Risk & Governance Committee with the accompanying detail available upon request.

5.7 The lead Professional Service takes full responsibility for the completion, internal departmental validation and timely submission of the return and the Planning, Risk, Intel, Management Info & Enhancement (PRIME) team undertake an independent review of the process by which the return is completed, as well as appropriate sense-checking and independent verification of all external regulatory and legally required data returns. The timing of the review will ensure that appropriate time is given for executive oversight and challenge.

6.0 RISKS

6.1 The key risks for failure to implement this policy appropriately are:

- Possibility of inaccurate data returns leading to financial loss.
- There is a risk of data not being covered by this policy such as individual or team-based research data being of poor quality leading to reputational and funding issues. However, this is mitigated through appropriate policies and management responsibility within Research Development & Support.
- Poor data quality could result in inappropriate decision-making across the institution.
- Possible reputational damage through inaccurate information in data returns in areas such as student recruitment and access.

Appendix – Data Quality Schedule 2023/24

ASSOCIATION	NAME OF RETURN	Risk Assessment	Lead Service
OfS	Access and Participation Plan	High	Academic Services
OfS	Access and Participation Plan Monitoring	High	Academic Services
HESA	Aggregate Offshore Record	Medium	Academic Services
OfS	Annual Fee Information Collection	Medium	Finance
HESA	Estates Management Record (EMR)	Medium	Estates
OfS	Financial Return	Medium	Finance
UK Government	Gender Pay Gap Reporting	Low	Human Resources
Research England	HEIF Annual Monitoring Statement	Medium	Research Development & Support
OfS	Higher Education Students Early Statistics (HESES) survey	Medium	Academic Services
HESA	Higher Education-Business and Community Interaction (HEBCI) Survey	Medium	Research Development & Support
ofS	Monitoring of recurrent funding allocations	Low	Finance
IPSOS-MORI	NSS Population	Low	Academic Services
OfS	Pay Ratio Data for Annual Report / Financial Statements	Low	Human Resources
HESA	Provider Profile Record	Medium	Human Resources
SLC	Registration & Attendance Confirmation	Medium	Finance / Academic Services
HESA	Staff Record	High	Human Resources
HESA	Student Record (Data Futures)	High	Academic Services
OfS	Teaching Capital Funding Monitoring Return	Medium	Finance
OfS	Transparent Approach to Costing (TRAC)	Medium	Finance
OfS	Transparent Approach to Costing for Teaching (TRAC-T)	Medium	Finance
HESA	Unistats Record	Low	Academic Services

APP Monitoring and TRAC(T) are unlikely to be required in 2023/24 but are retained in this table for completeness.

REF submissions may also be subject to the data quality process; however, the next REF submission is not likely to be until 2027 so is not listed above but is retained in this footnote for completeness.