

Corporate	ICBP010 Data Quality Policy
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Version Number	Date Issued	Review Date
V3	July 2024	July 2026

<b>Prepared By:</b>	Senior Governance Manager, NECS
<b>Consultation Process:</b>	Integrated Governance Workstream
<b>Formally Approved:</b>	July 2024
<b>Approved By:</b>	Executive Committee

#### EQUALITY IMPACT ASSESSMENT

Date	Issues
May 2024	None

#### POLICY VALIDITY STATEMENT

Policy users should ensure that they are consulting the currently valid version of the documentation. The policy will remain valid, including during its period of review. However, the policy must be reviewed at least once in every 3-year period.

#### ACCESSIBLE INFORMATION STANDARDS

If you require this document in an alternative format, such as easy read, large text, braille or an alternative language please contact [NECSU.Comms@nhs.net](mailto:NECSU.Comms@nhs.net)

## Version Control

Version	Release Date	Author	Update comments
1.0	July 2022	Senior Governance Manager, NECS	First Issue
2.0	October 2022	Senior Governance Manager, NECS	Initial 6 monthly review following ICB establishment, no updates required
3.0	July 2024	Senior Governance Manager, NECS	

## Approval

Role	Name	Date
Approver	Executive Committee	July 2022
Approver	Executive Committee	October 2022
Approver	Executive Committee	July 2024

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## 1. Introduction

The ICB 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 their carers, public, staff, stakeholders and the use of public resources. In order to provide clear and consistent guidance, the organisation will develop documents to fulfil all statutory, organisational and best practice requirements and support the principles of equal opportunity for all.

The ICB 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/service user care, governance, management and service agreements for health care planning and accountability.

### 1.1 Status

This policy is an Information Governance policy.

### 1.2 Purpose and scope

This policy is designed to ensure that the importance of data quality within the ICB is disseminated to all staff. It will describe the meaning of data quality, who is responsible for its maintenance and how it can continue to improve in the future.

Although this policy relates to patient/service user data and information, the principles included are applicable to any other data/information staff may encounter i.e. recording of minutes, etc.

## 2. Definitions

The following terms are used in this document:

- 2.1 **Data:** Data is a collection of facts from which information is constructed via processing or interpretation.
- 2.2 **Information:** Information is the result of processing, gathering, manipulating and organising data in a way that adds to the knowledge of the receiver.
- 2.3 **Data Quality:** Data quality is a measure of the degree of usefulness of data for a specific purpose.

### 3. Data Quality

3.1.1 A vast amount of data is recorded when caring for patients in commissioned services. Having accurate, relevant information that is accessible at the appropriate times is essential to each and every health management or business decision and to the success of the service provided. With this in mind, it is essential that all employees of the ICB recognise the importance of data quality and their responsibilities in this area.

3.1.2 Quality information is essential for:

- The delivery of effective, relevant and timely care, and to minimise risks to patients.
- Efficient administrative and health care processes, such as communication with patients, their families and other carers and professionals involved in their treatment/care.
- Management and strategic planning, requiring accurate information about the volume and type of health care activity to provide appropriate allocation of resources and future service delivery.
- Establishing acceptable service agreements for health care provision.
- Health care governance, which depends on detailed, accurate patient data for the identification of areas where health care could be improved.
- Providing information for other NHS and non-NHS organisations – these organisations depend on the information sent to them and need to have confidence in its quality.
- Providing a foundation on which future investments will be based, such as the implementation of the National Programme for IT, where data will be shared on the spine and accessed by other parts of the NHS.
- Being able to allow local and national benchmarking.
- Budget Monitoring, including Payment by Results, and financial planning to support service delivery.
- Avoiding unnecessary Data Subject Rights Requests to alter incorrect personal data.

3.1.3 It is also important to ensure that the data quality is of a high standard in order to comply with the Data Protection Act 2018 in particular principle 4, 'accurate and up-to-date'.

3.1.4 Data Protection Act 2018 incorporates the EU General Data Protection Regulations. As well as outlining 6 principles of data protection, the legislation contains a principle of accountability for data controllers and

processors and introduces rights for data subjects, one of which is the right to have incorrect personal data amended.

## **3.2 Data Standards**

3.2.1 The standards for good data quality are reflected in the criteria below. Data needs to be:

- Complete (in terms of having been captured in full)
- Accurate (the proximity of the data to the exact or true values)
- Relevant (the degree to which the data meets current and potential user's needs)
- Accessible (data must be retrievable in order to be used and in order to assess its quality)
- Timely (recorded and available as soon after the event as possible)
- Valid (within an agreed format which conforms to recognised national and local standards)
- Defined (understood by all staff who need to know and reflected in procedural documents)
- Appropriately sought (in terms of being collected or checked with the patient during a period of care)
- Appropriately recorded (in both paper and electronic records)
- Processed in accordance with any existing data sharing agreement or data processing agreement.

3.2.2 The use of data standards within systems can greatly improve data quality. These can be incorporated into systems either using electronic validation programmes which are conformant with NHS standards, e.g. drop down menus, or manually generated lists for services that do not yet have computer facilities. Either method requires the list to be generated from nationally or locally agreed standards and definitions, e.g. for GP practice codes, ethnicity, etc. These must be controlled, maintained and updated in accordance with any changes that may occur, and in addition electronic validation programmes must not be switched off or overridden by operational staff.

### **3.2.3 NHS Data Model and Dictionary**

The NHS Data Model and Dictionary gives common definitions and guidance to support the sharing, exchange and comparison of information across the NHS. The common definitions, known as data standards, are used in commissioning and make up the base currency of Commissioning Data Sets. On the monitoring side, they support comparative data analysis, preparation of performance tables, and data returned to the Department of Health and Social Care NHS data standards also support clinical messages, such as those used for pathology and radiology. NHS data standards are presented as a

logical data model, ensuring that the standards are consistent and integrated across all NHS business areas.

#### 3.2.4 Information Standards Notices (ISNs)

- The NHS communicates key changes to data standards, and deadlines affecting changes are made through ISNs. These changes must be monitored by IAOs (system administrators) to ensure that data and information systems to which ISNs apply are in compliance with the standards they specify
- Individual systems IAOs are responsible for gaining assurance that the suppliers of the ICB information systems are updated in accordance with new ISNs to ensure systems conform to all requirements.
- From a commissioning perspective, changes need to be made to the data quality processes to ensure any changes have been implemented by suppliers of data e.g. provider services.

#### 3.2.5 Clinical Coding

- Consistent data formats and the use of appropriate coding systems is key to effective electronic healthcare in the NHS.
- Coding systems such as Snomed codes are a coded thesaurus of clinical terms which are the basic means by which clinicians record patient findings and procedures in health care IT systems across primary and secondary care (e.g. General Practice surgeries and pathology reporting of results).
- The ICB will promote and improve data quality standards by working with GP practices to assess the quality of their clinical data and identify problems with coding issues to ensure that high quality of patient recording is maintained.

#### 3.2.6 Where no National Standards Exist

In certain situations there will be no applicable NHS national standards. In these instances the ICB will agree local standards as part of the contracting process. It is important that any local standards are subject to annual reviews within the ICB as there will be no automatic input received from national sources. This process will ensure their validity and continued relevance.

### **3.3 Data Validation**

### 3.3.1 Importance of validation

- Validation encompasses the processes that are required to ensure that the information being recorded is of good quality. These processes deal with data that is being added continuously and also can be used on historical data to improve its quality.
- It is imperative that regular validation processes and data checks/audits are undertaken on data being recorded to assess its completeness, accuracy, relevance, accessibility and timeliness. Such processes may include: checking for duplicate or missing data; checking for deceased patients; validating waiting lists; ensuring that national definitions and coding standards are adopted, and NHS numbers are used and validated.

### 3.3.2 Validation methods

- Validation should be accomplished using some or all of the following methods.
- Bulk exception reporting; which involves a large single process of data analysis to identify all areas within a dataset where quality issues exist and to enable the correction of this data. Bulk exception reporting can sometimes be used as an initial data quality tool as this will quickly highlight any areas of concern. However, further investigation may be required to identify more specific issues.
- Regular spot checks/audits; which involve analysis of a random selection of records against source material, if available. Spot checks should be done on an ongoing regular basis to ensure the continuation of data quality. Other audits take place on an annual basis, and where an external or internal audit of a system is planned, it will include data quality.
- Data cross checking; which can also be performed on data and information held by different services and/or on separate systems. For example, secondary care data against the Exeter system to validate the recorded GP practice. Templates allow users to enter results and data into the patient's health record in a consistent and coherent manner. They ensure that users enter all of the required information about a patient's problem or symptom accurately and prompt the user in a logical format to enter the key information ensuring that accurate data capture occurs. The ICB assists GP practices in developing and reviewing templates to ensure consistency across the local area.
- Further help in identifying the best methods of data validation can be obtained from the ICB team responsible for data quality.



### **3.4 Synchronising information systems**

In situations where data is shared or is common between systems it is imperative that the source data be validated initially. Any modifications made to this data must then be replicated in other related systems, ensuring there are no inconsistencies between them. Synchronisation between systems is required to ensure that all data sources reflect the same information.

### **3.5 Timescales for validation**

Where inconsistencies in data and information are identified these must be acted upon in a timely fashion and documented. Locally agreed deadlines will apply to the required corrections but all amendments should be made within a maximum of two months from the identification date.

Where a data subject is making a Data Subject Rights Request to correct or amend inaccurate data, the process must be completed and the data subject informed within 30 calendar days under Data Protection Legislation.

### **3.6 External sources of data**

Where possible validation processes should use accredited external sources of information, for example using Patient Demographic Service (PDS) to check NHS numbers, National Administrative Codes Set (NACS) to check organisation/GP codes, Exeter system to check deaths.

The ICB will use external sources of data to improve data quality, for example, SUS data quality dashboards on a regular basis to check comparative data and identify previously unidentified issues.

### **3.7 Using source data**

Staff involved with recording data need to ensure that it is performed in a timely manner and that the details being recorded are checked with the source at every opportunity. This could be by cross checking with patient paper records or by asking the patients themselves.

### **3.8 NHS Numbers**

The NHS number is a unique way of identifying patients in NHS systems. With this in mind it is imperative that this is recorded correctly and in all systems where patient information is present.

The Personal Demographics Service (PDS) will be used to obtain verified NHS numbers i.e. NHS number status and as PDS has significant historic data it will enable record matching process and support the resolution of data anomalies (see also External Sources of Data section).

### **3.9 Monitoring of Data Quality**

As a commissioning organisation, the ICB has the responsibility of monitoring the data quality of the services it commissions. This will be carried out in a variety of ways according to the type of service and the data it collects. Examples include, NHS number compliance, pseudonymisation, compliance with new ISNs, Reference Cost Audits, and Data Security & Protection Toolkit data quality requirements. The responsible department will report the monitoring of data quality to the responsible committee in accordance with agreed timescales.

## **4. Implementation**

- 4.1 This policy will be available to all staff for use in relation to the specific function of the policy.
- 4.2 All directors and managers are responsible for ensuring that relevant staff within their own directorates and departments have read and understood this document and are competent to carry out their duties in accordance with the procedures described.

## **5. Training Implications**

It has been determined that there are no specific training requirements associated with this policy.

## **6. Documentation**

- 6.1 **Other related policy documents.**  
Information Governance and Information Risk Policy
- 6.2 **Legislation and statutory requirements**
  - Data Protection Act 2018
  - General Data Protection Regulations 2016.
- 6.3 **Best practice recommendations**
  - NHS Digital Data Protection and Security Toolkit – data quality requirements

## 7. Monitoring, Review and Archiving

### 7.1 Monitoring

The ICB Board will agree with the Director of Corporate Governance, Communications and Engagement a method for monitoring the dissemination and implementation of this policy. Monitoring information will be recorded in the policy database.

### 7.2 Review

7.2.1 The ICB Board will ensure that this policy document is reviewed in accordance with the timescale specified at the time of approval. **No policy or procedure will remain operational for a period exceeding three years without a review taking place.**

7.2.2 Staff who become aware of any change which may affect a policy should advise their line manager as soon as possible. The Executive director will then consider the need to review the policy or procedure outside of the agreed timescale for revision.

7.2.3 For ease of reference for reviewers or approval bodies, changes should be noted in the 'document history' table on the front page of this document.

**NB:** If the review consists of a change to an appendix or procedure document, approval may be given by the Executive director and a revised document may be issued. Review to the main body of the policy must always follow the original approval process.

### 7.3 Archiving

The ICB Board will ensure that archived copies of superseded policy documents are retained in accordance with the NHS Records Management Code of Practice.

## Schedule of Duties and Responsibilities

Through day to day work, employees are in the best position to recognise any specific fraud risks within their own areas of responsibility. They also have a duty to ensure that those risks, however large or small, are identified and eliminated. Where it is believed fraud, bribery or corruption could occur, or has occurred, this should be reported to the Counter Fraud Authority or Executive Director of Finance immediately.

<b>ICB Board</b>	The ICB Board has responsibility for setting the strategic context in which organisational process documents are developed, and for establishing a scheme of governance for the formal review and approval of such documents
<b>Chief Executive</b>	The Chief Executive has overall responsibility for the strategic direction and operational management, including ensuring that ICB process documents comply with all legal, statutory and good practice guidance requirements.
<b>Senior Governance Manager for information governance</b>	The Senior Governance Manager for information governance will update this policy in line with legislation, guidance and best practice.
<b>Commissioning Support Staff.</b>	Whilst working on behalf of the ICB NECS staff will be expected to comply with all policies, procedures and expected standards of behaviour within the ICB, however they will continue to be governed by all policies and procedures of their employing organisation
<b>All Staff</b>	<p>All staff, including temporary and agency staff, are responsible for:</p> <ul style="list-style-type: none"> <li>· Compliance with relevant process documents. Failure to comply may result in disciplinary action being taken.</li> <li>· Co-operating with the development and implementation of policies and procedures and as part of their normal duties and responsibilities.</li> <li>· Identifying the need for a change in policy or procedure as a result of becoming aware of changes in practice, changes to statutory requirements, revised professional or clinical standards and local/national directives, and advising their line manager accordingly.</li> <li>· Identifying training needs in respect of policies and procedures and bringing them to the attention of their line manager.</li> <li>· Attending training / awareness sessions when provided.</li> </ul>

## Appendix A – Equality Impact Assessment

### Equality Impact Assessment Initial Screening Assessment (STEP 1)

As a public body organisation we need to ensure that all our current and proposed strategies, policies, services and functions, have given proper consideration to equality, diversity and inclusion, do not aid barriers to access or generate discrimination against any protected groups under the Equality Act 2010 (Age, Disability, Gender Reassignment, Pregnancy and Maternity, Race, Religion/Belief, Sex, Sexual Orientation, Marriage and Civil Partnership).

This screening determines relevance for all new and revised strategies, policies, projects, service reviews and functions.

Completed at the earliest opportunity it will help to determine:

- The relevance of proposals and decisions to equality, diversity, cohesion and integration.
- Whether or not equality and diversity is being/has already been considered for due regard to the Equality Act 2010 and the Public Sector Equality Duty (PSED).
- Whether or not it is necessary to carry out a full Equality Impact Assessment.

#### Name(s) and role(s) of person completing this assessment:

**Name:** Liane Cotterill

**Job Title:** Senior Governance Manager

**Organisation:** North of England Commissioning Support Unit

**Title of the service/project or policy:** Data Quality Policy

#### Is this a;

**Strategy / Policy**  **Service Review**  **Project**

**Other** [Click here to enter text.](#)

#### What are the aim(s) and objectives of the service, project or policy:

This policy is designed to ensure that the importance of data quality within the ICB is disseminated to all staff. It will describe the meaning of data quality, who is responsible for its maintenance and how it can continue to improve in the future.

#### Who will the project/service /policy / decision impact?

(Consider the actual and potential impact)

- **Staff**
- **Service User / Patients**
- **Other Public Sector Organisations**
- **Voluntary / Community groups / Trade Unions**
- **Others, please specify** [Click here to enter text.](#)

Questions	Yes	No
Could there be an existing or potential negative impact on any of the protected characteristic groups?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Has there been or likely to be any staff/patient/public concerns?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Could this piece of work affect how our services, commissioning or procurement activities are organised, provided, located and by whom?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Could this piece of work affect the workforce or employment practices?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does the piece of work involve or have a negative impact on: <ul style="list-style-type: none"> <li>• Eliminating unlawful discrimination, victimisation and harassment</li> <li>• Advancing quality of opportunity</li> <li>• Fostering good relations between protected and non-protected groups in either the workforce or community</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**If you have answered no to the above and conclude that there will not be a detrimental impact on any equality group caused by the proposed policy/project/service change, please state how you have reached that conclusion below:**

Click here to enter text.

**If you have answered yes to any of the above, please now complete the ‘STEP 2 Equality Impact Assessment’ document**

Accessible Information Standard	Yes	No
Please acknowledge you have considered the requirements of the Accessible Information Standard when communicating with staff and patients.  <a href="https://www.england.nhs.uk/wp-content/uploads/2017/10/accessible-info-standard-overview-2017-18.pdf">https://www.england.nhs.uk/wp-content/uploads/2017/10/accessible-info-standard-overview-2017-18.pdf</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Please provide the following caveat at the start of any written documentation:  <b>“If you require this document in an alternative format such as easy read, large text, braille or an alternative language please contact (ENTER CONTACT DETAILS HERE)”</b>		
<b>If any of the above have not been implemented, please state the reason:</b>  Click here to enter text.		

## **Governance, ownership and approval**

Please state here who has approved the actions and outcomes of the screening		
<b>Name</b>	<b>Job title</b>	<b>Date</b>
Executive Committee	Approver	TBC

## **Publishing**

This screening document will act as evidence that due regard to the Equality Act 2010 and the Public Sector Equality Duty (PSED) has been given.

If you are not completing 'STEP 2 - Equality Impact Assessment' this screening document will need to be approved and published alongside your documentation.

**Please send a copy of this screening documentation to:  
NECSU.Equality@nhs.net for audit purposes.**