

Northern Ireland



Medical & Dental Training Agency

POLICY DOCUMENT

Data Quality Policy

2019 – (Version 2.1)
SMT>G&R>Board

Policy Review Schedule

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Amendment Overview

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2016 – 1.0	29/09/2016		Policy approved by Board	
2019 – 2.0	04/02/2019	4, 6, 7	Policy Reviewed – minor changes to wording	Mark Oliver
2019 – 2.0	13/02/2019		Approved by Governance and Risk Committee	
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2019 – 2.1	03/10/2019	4, 5	“Role of NIMDTA” amended	Mark Oliver

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Role of the Northern Ireland Medical and Dental Training Agency

The Northern Ireland Medical and Dental Training Agency (NIMDTA) is an Arm's Length Body sponsored by the Department of Health (DoH) to train postgraduate medical and dental professionals for Northern Ireland. NIMDTA also seeks to serve the government, public and patients of Northern Ireland by providing specialist advice, listening to local needs and having the agility to respond to regional and national requirements.

NIMDTA commissions, promotes and oversees postgraduate medical and dental education and training throughout Northern Ireland. NIMDTA endeavours to attract and appoint individuals of the highest calibre to recognised training posts and programmes. NIMDTA encourages doctors to train and remain in NI so that Health and Social Care (HSC) has a highly competent medical and dental workforce with the essential skills to meet the changing health needs of its population.

NIMDTA organises and delivers the recruitment, selection and allocation of doctors and dentists to foundation, core and specialty training programmes. NIMDTA supports trainees with the aim of maximising their potential to successfully progress, complete training and be appointed to permanent posts in NI. NIMDTA manages the quality of postgraduate medical and dental education in HSC Trusts and in general medical and dental practices through learning and development agreements, the receipt of reports, regular meetings, trainee surveys and inspection visits. It works in close partnership with local education providers to ensure that both the training and supervision of trainees support the delivery of high quality safe patient care. NIMDTA provides trainees with a wide range of opportunities to gain experience in leadership, quality improvement, research and teaching.

NIMDTA recognises and trains clinical and educational supervisors and selects, appoints, trains and develops educational leaders for foundation, core and specialty medical and dental training programmes throughout NI.

NIMDTA is accountable to the General Medical Council (GMC) for ensuring that the standards set by the GMC for medical training, educational structures and processes are achieved. Revalidation is the

process by which the GMC confirms that doctors are up to date and fit to practice. The Postgraduate Medical Dean, as the 'Responsible Officer' for doctors in training, has a statutory role in making recommendations to the GMC to support the revalidation of trainees. NIMDTA works to the standards in the COPDEND framework for the Quality Development of postgraduate Dental training in the UK.

NIMDTA enhances the standard and safety of patient care through the organisation and delivery of relevant and valued career development for general medical and dental practitioners and dental care professionals. It also supports the career development of general medical practitioners and the requirements for revalidation through the management and delivery of GP appraisal.

NIMDTA carries out these roles on behalf of the DoH by focussing on the needs of people (population, trainees, trainers and NIMDTA staff), in partnership with key stakeholders and by paying attention to HSC Values - openness and honesty, compassion, excellence and working together.

Executive Summary

We need to collect and use information about people with whom we work in order to carry out our business and provide our services. These may include members of the public, current, past and prospective employees and trainees, customers and suppliers. In addition, we may be required by law to collect and use information. This policy is concerned with ensuring that the data collected and recorded is of high quality and is reliable.

Policy Influence

This policy has been influenced by the following:

- Data Protection Act 2018
- General Data Protection Regulation
- HSSPS Code of Practice on Protecting the Confidentiality of Service User Information
- Freedom of Information Act 2000
- Draft DHSSPS Data Protection Policy Statement
- Caldicott Guardian Manual

Policy Impact

This policy may have an impact on the following:

- Data Protection and Confidentiality Policy
- Freedom of Information Publication Scheme
- Information Requests Procedure
- IT Policy
- Records Management Policy
- Records Management Strategy
- Information Governance Policy
- Disciplinary Procedure

1. Introduction

The purpose of this Policy is to set out the Northern Ireland Medical and Dental Training Agency's (NIMDTA) requirements for ensuring that the data collected and recorded is of an appropriate quality for the uses to which it is put, or might be put in the future. The objectives of the Policy are:

- To instil confidence in all data and information that is used from operational information to strategic decision-making information, including that which is shared with other organisations or made public.
- Enhanced efficiency and effectiveness arising from the reduction of errors and improved accuracy and reliability resulting from a more structured approach to improving data quality.
- To underpin the better use of information to support services

2. Legal Compliance

The requirement to maintain quality of personal information is also covered by legislation, for example, Data Protection Act 2018 Principle 3 requires that personal data must be adequate, relevant and not excessive. Principle 4 requires that personal data be accurate and kept up-to-date.

3. Scope

This Policy applies to all data within NIMDTA, including data captured by NIMDTA; gathered from partners or external data sources; provided to the public, partners, Government or others, but is primarily aimed at:

- Data for service provision where NIMDTA is dependent on the regular collection and maintenance of quality service user data to provide an efficient and effective service.

- Information provided for internal management and external reporting purposes.
- Information that will be shared with or received from other organisations
- Information that is published in print or via the web

It applies to all those involved in collecting and entering data and those responsible for the management of those information assets. It should be read in conjunction with the Information Governance Policy, **Information Governance Framework** and Records Management Policy.

4. Data Quality Characteristics

This policy aims to ensure the achievement of quality data by requiring the following:

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	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 NIMDTA.
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5. Training and Awareness

There will be effective communication and awareness of this Policy, the implications of poor data quality and the Policy's requirements.

Training should be provided to all staff with responsibility for information quality and records management, with refresher training provided periodically. All staff entering data should be trained to ensure that data is recorded correctly and appropriately, with appropriate mechanisms put in place to allow reporting of any errors, omissions, or potential problems.

6. Documented Standards and Procedures

Data Quality should be embedded in business practices. There should be documented requirements, definitions and rules. This will include appropriate national data standards (where appropriate) and the data requirements of those with whom NIMDTA shares information (for example, the GMC).

Data quality should be considered as part of all information sharing arrangements, both internal and external, to ensure that shared data is of appropriate quality. With regards to data shared internally, it is important that additional copies or versions of data are not created unnecessarily.

Large scale data collection exercises and external returns should always be supported by data quality procedures which will be made available to all staff involved in data collection.

7. New and Changed Systems

The identification and consideration of data quality risks and requirements will be undertaken as part of the risk management process for projects and programmes. Data migration must include data cleansing where necessary. Any user acceptance testing should include data validation and data quality testing. There should be evidence of all data quality issues being resolved prior to live implementation.

8. Risk Management

Risk management aspects within Data Quality will follow the same broad principles and processes as set out within the Assurance Framework.

Data quality risks and countermeasures will be reviewed at least annually as part of Information Asset Risk Assessments, or as required by circumstances.

Examples of some of the risks associated with data quality problems are:

- Negative consequences, financial and other, as a result of submitting inaccurate or misleading data in statutory or regulatory returns
- Misleading external and internal impressions of NIMDTA performance and services
- Regulatory action and fines from the Information Commissioner for breaches of the Data Protection Act or Freedom of Information legislation.

NIMDTA can suffer reputational damage as a result of data quality problems.

9. Data Quality and Records Management

There is a close relationship between data quality and records management, the former being focused on data collection and the latter

on collections of records. Sometimes these overlap where data input or recording is less structured.

For example, this Policy focuses primarily on data collection in structured ICT based systems, but it will be apparent that widespread use is made of 'Free Text' or 'Comments' fields, which do not lend themselves to data validation.

Staff recording in these fields will need additional guidance on what is appropriate to record as it is sometimes overlooked that any information recorded may be required to be disclosed under FOI or DPA legislation.

The Data Quality Policy and Records Management Policy should be read together because they are complementary and form a full management approach to the 'information life cycle' for NIMDTA.

10. Roles and Responsibilities

The **NIMDTA Board** has overall responsibility for the efficient administration of Information Governance, including Data Quality and Records Management.

The **Governance and Risk Committee** receives progress reports on Data Quality issues and will report to the Board accordingly.

The **Chief Executive / Personal Data Guardian** has overall responsibility for Information Governance within NIMDTA. They are responsible for the management of Information Governance, including Data Quality and Records Management, and for ensuring appropriate mechanisms are in place to support service delivery and continuity. They are also the responsible officer for the purpose and manner in which personal data is collected, processed, stored, shared and disposed of.

The **Senior Information Risk Owner (SIRO)** has overall corporate responsibility for the Information Governance Framework, including Data Quality and Records Management.

Day-to-day responsibility for administration and compliance with this Policy is delegated from the Board through the Chief Executive to respective **Heads of Departments** for their service area.

Information Asset Owners (IAOs) will: ensure compliance with this policy in respect of information assets for which they have responsibility. They will also work with their Head of Department (if applicable) to ensure awareness of the need for Information Governance within NIMDTA and to ensure that the control and handling of information within their department does not contravene any appropriate legislation or NIMDTA procedures. IAOs will also ensure that Data Quality requirements are included in all information systems and produce Data Quality Procedures/Guidance for their assigned Information Assets.

Team Leaders are responsible for ensuring that staff under their direction and control, are aware of the policies, procedures and guidance associated with Information Governance and Data Quality, and for checking that those staff understand and appropriately apply policies, procedures and guidance in respect of Information Governance in carrying out their day-to-day work.

11. Compliance and Breaches

Data collection and validation activities will be regularly monitored. Assessment of ongoing compliance with this policy will be overseen by the Information Asset Owner in respect of the Information Asset(s) for which they have responsibility. Information regarding compliance will be provided as part of the Information Asset Risk Assessment which IAOs are required to complete at least once per year.

Any breaches of the principles of this Policy should be reported to the Senior Information Risk Owner (SIRO). Data errors should be reported through normal channels. Failure to comply with this Policy may result in disciplinary action under the auspices of the Disciplinary Procedure.