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Freedom of Information Act 2000

I am writing in response to your request for information made under the Freedom of Information Act 2000 in relation to a Data Quality Framework.

You asked:

I am writing to see if you currently have a Data Quality Framework in place. if so, would you please share and provide me with a copy of it?

Trust response:

We do not have a DQ Framework as such, but we have the attached Strategy which may be of use.

We are trying to use this as much as possible. Data quality - NHS Digital

Data Quality Strategy
2020-2023

Author(s): James Jarvis
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Documentation

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The document is located in P:/Data Quality/Strategy and is held in electronic format.

Approvals Record
This document requires the following approvals. Signed copies of this approval form are filed in the Management section of the project files.

Name	Title	Signature
Steve Orpin	Chief Finance Officer and Deputy Chief Executive Officer	
Morfydd Williams	Director of Information Technology	
James Jarvis	Associate Director of Business Intelligence	
Gail Spinks	Head of Information Governance	

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This document has been distributed to:

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Enquiries
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1 Introduction

Consistent, high quality, timely and comprehensive information underpins sound decision making at every level in the NHS and contributes to the improvement of both health care and organisational efficiency. This strategy describes how data quality will be improved at Maidstone and Tunbridge Wells NHS Trust (MTW).

Good data quality is essential to ensuring that, at all times, reliable information is available throughout the Trust to support clinical and/or managerial decisions. Poor data quality is not acceptable to the Trust due to the risks which could arise from the use of unreliable clinical and/or managerial information.

This strategy aims to provide a framework within which the Trust can maximise the completeness, accuracy and validity of data. It recognises the need to ensure that data is collected for justifiable purposes and used in accordance with sound principles of information management.

It acknowledges that existing guidance on the management of data quality needs to be embedded in a single strategy with clear structures, processes and accountabilities. It provides a fundamental statement of responsibilities which should underpin all data collection, management and monitoring activities within the Trust.

Finally, it is important to reinforce the fact that ensuring good data quality is the responsibility of everyone involved in delivering and supporting care at MTW.

2 What is Data Quality?

Data are of high quality "if they are fit for their intended uses in operations, decision making and planning."

It is important because:

- Acceptable data quality is crucial to operational and transactional processes and to the reliability of business analytics / business intelligence reporting,

- High quality information leads to improved decision making which in turn results in better patient care, wellbeing and safety. There are potentially serious consequences if information is not correct, secure and up to date,

- Management information produced from patient data is essential for the efficient running of the trust and to maximise utilisation of resources for the benefit of patients and staff,

- Poor data quality puts organisations at significant risk of: damaging stakeholder trust; weakening frontline service delivery; incurring financial loss; and poor value for money,

As well as the above, and the potential impact that poor data can have on finances, data controllers are required under the Data Protection Act 1998, principle 4 to ensure that 'data are kept accurate and up-to-date'.

In order to comply with this provision, organisations should:

- take reasonable steps to ensure the accuracy of any personal data you obtain;
- ensure that the source of any personal data is clear;
- carefully consider any challenges to the accuracy of information; and
- consider whether it is necessary to update the information

NHS England states that 'Poor data quality should be managed in exactly the same way as poor care and poor financial management as these aspects of health and social care will increasingly be reliant

on data to make decisions therefore the fidelity of the data is at the heart of the future assessment of the system'.

3   Our Vision

Our vision is to ensure that we adhere to all relevant local and national data standards and applicable best practice guidance to support the delivery, commissioning and regulation of high quality and safe healthcare service at MTW.

4   Standards for good Data Quality - Achieving our vision

This strategy is linked to the Provider Data Quality Assurance Framework released by NHS Digital in February 2020, which is built around five main themes; Oversight, Process, People, Systems and Measures. This framework has been developed to meet the requirements of Assertion 1.7 of the Data Security & Protection tool and support the published technical guidance that accompanies this.

Implementing this framework will support the delivering our vision, ensuring that our systems, processes and staff are developed to ensure a 'getting it right first time approach'.

In order to achieve our vision we will implement the following standards for data quality. These standards distil the principles and practices identified in existing guidance, advice and good practice. Some of these standards are already in place, but are set out in the strategy for clarity and completeness.

4.1   Oversight
MTW will put in place a corporate framework for management and accountability of data quality, with a commitment to secure a culture of data quality throughout the organisation.

Standard 1: the Trust will establish a Data Quality Group that meets on a regular basis and sets data quality strategy and policy for the organisation.

Key components:

4.1.1   A Data Quality Steering Group will be established as part of the Trust's existing governance structure
4.1.2   The Data Quality Steering Group will have a defined Terms of Reference and membership of sufficient seniority to influence data quality strategy and policy
4.1.3   The Data Quality Steering Group will be responsible for setting the Trust's data quality strategy and policy and subsequent monitoring of compliance
4.1.4   The Data Quality Steering Group will take regular input from other aspects of data quality assurance such as incident reporting and internal / external metrics to direct its actions
4.1.5   Outputs of the Data Quality Steering Group will form part of the reporting that goes to Executive Sponsor / Board to support oversight

These components will be overseen by a Data Quality Steering Group, which will meet quarterly and sets the data quality strategy and policy for the Trust. The group will be chaired by the Chief Finance Officer and Deputy Chief Executive Officer.

4.2   Process
The Trust will ensure there are appropriate policies or procedures in place to secure the quality of the data it records and uses for reporting.

Standard 2: the Trust will establish processes for reporting and actioning data quality related incidents to resolve and learn from data quality errors.

Key components:
4.2.1   The Trust's incident reporting system will be configured to explicitly capture and report on data quality incidents
4.2.2   The Trust will have explicit data quality processes to monitor and act on data quality incidents across the organisation
4.2.3   Data quality incidents will be reviewed on a regular basis through a Data Quality Group to identify problems and trends
4.2.4   Findings and recommendations from data quality incidents will be used to improve policy, staff awareness and training
4.2.5   Data quality incidents will be included within internal metrics that are reported to the Executive Sponsor / Board to support oversight

4.3   People

The Trust will put in place arrangements to ensure that staff have the knowledge, competencies and capacity for their roles in relation to data quality. Particular focus will be given to administrative support staff and a programme of training will be developed specifically for this key staff group. General awareness raising will be prioritised in our communications ensuring that all staff understand the importance of good data quality and the risks associated with poor quality data.

Standard 3: the Trust will develop formal data quality related training & education programme delivered to all staff within the organisation.

Key components:

4.3.1   The responsibility for managing and monitoring data quality within the organisation will be allocated to specific individual or team
4.3.2   This will be reflected in the roles and responsibilities of those directly or indirectly responsible for data quality at the point of capture / entry
4.3.3   Inputs required to support staff involved in data quality will be available and signed off where relevant
4.3.4   Outputs will be produced that can be used to support staff providing assurance
4.3.5   Roles that are critical to ensuring staff know their data quality responsibilities will be located in the same in place

4.4   Systems

The Trust will put in place systems and processes which secure the quality of data as part of our normal business activities.

Standard 4: the Trust will have a comprehensive programme of systems training that defines system usage best practice and promotes the capture of quality data at the point of entry.

Key components:
4.4.1   A programme of systems training will be put in place that aligns to the different roles and responsibilities of staff
4.4.2   System training will be available in a range of formats to support different learning styles and levels of existing capability
4.4.3   Systems training will be maintained up to date with both local configuration changes and supplier developments
4.4.4   Learning from recurrent data quality issues / incidents will be reflected in the systems training

4.4.5   Compliance with system training will be monitored and reported on

4.5 Measures

The Trust will ensure that arrangements are in place that are focused on ensuring that data supporting reported information are actively used in the decision making process, and are subject to a system of internal control and validation.

Standard 5: the Trust will ensure there are local data quality metrics in place to assure the underlying data used in key pathways or metrics.

Key components:

4.5.1   There will be a data quality assurance scheme and metrics in place to assure the quality of data critical to key processes, pathways and/or performance indicators

4.5.2   Access will be made available to the scheme and metrics outputs to those responsible for data quality assurance activities

4.5.3   Data and external inputs required to measure impact of data quality activities will be available to those responsible for data quality assurance activities

4.5.4   Internal metrics will be produced and used to provide assurance

4.5.5   Clear roles will be assigned to contribute to, own and approve internal DQ metrics

5   Next steps

A baseline assessment will be undertaken against these standards and the results of this will form the basis of a work plan, which will be overseen by the Data Quality Steering Group. Standards will be delegated to the relevant sub-groups of the Steering Group or named individuals / teams where appropriate. Quarterly updates will be prepared by the named leads for each meeting of Steering Group to ensure that progress is being made.

6   Partnership Working

The Trust will continue to work closely with our partners across Kent and Medway under the governance that has been established around the STP, engaging with relevant programmes of work that might support the delivery the vision and the standards that underpin in it as set out in the strategy. The Shared Health and Care analytics Board (SHcAB) and the Analytics Strategy that has been developed for Kent and Medway is of particular relevance. The Associate Director of Business Intelligence will provide the link between the Trust's Data Quality Steering Group and the SHAcAB, ensuring that the Trust is adequately represented at the group and engaged in all relevant projects.

7   Summary

The benefits of using routine health care data for planning, policy making, and research are well established. Developments are underway to use this same data to build better and safer care through decision support systems and artificial intelligence. However, using data to augment direct care requires that data is high quality: timely, complete and accurately coded. This strategy provides a framework for the Trust to help build high quality data with benefits for patients, clinicians and the organisation.

Appendix 1: Tools and Resources

Strategic Data Collection Service (SDCS) external user guidance - The SDCS is the new secure data collection system provided by NHS Digital which accepts uploads of submissions in a variety of formats. This guidance will help relevant organisations register to download and upload their data securely. Currently this supports Mental Health and Maternity Services Data Sets.

Specifications and implementation guidance for the submission of key datasets can be found in the associated links listed here

Diagnostic Imaging Data Set (DID)

Improving Access to Psychological Therapies (IAPT)

Mental Health Services Data Set (MHSDS)

Community Services Data Set (CSDS)

Maternity Services Data Set (MSD)

Emergency Care Data Set (ECDS)

HES Data Quality and the processing cycle explains and supports how data comes from routine submissions of data to NHS Digital for the purposes of payment for and commissioning of healthcare in England

Data Quality Maturity Index – DQMI - The DQMI is published monthly by NHS Digital about data quality in the NHS, providing data submitters with timely and transparent information. These resources also provide links to all DQMI publications, the associated methodology and interactive reports.

NHS Digital Data Quality Assurance Strategy – Addresses how data quality assurance will be undertaken in a consistent, efficient and timely manner across data collection services offering provider organisations and their respective system vendors explicit and actionable feedback that delivers a demonstrable improvement in data quality at source.

Commissioning for Quality and Innovation CQUINs – Scheme run by NHS England around chosen indicators for best practice. Linked to the NHS Long Term Plan, Mental Health is featured to include improvements in data quality

In addition to these, supporting standards linked to clinical record keeping and data quality may also be published by Royal Colleges and Institutions for the Professions.

Appendix 2: Policies and Guidelines

The Data Security and Protection Toolkit is an online self-assessment tool that enables organisations to measure and publish their performance against the National Data Guardian's ten data security standards. All organisations that have access to NHS patient data and systems must use this toolkit to provide assurance that they are practising good data security and that personal information is handled correctly. Assertion 1.7 of the Data Security & Protection Toolkit requires provider organisations to evidence the quality of their data through audit.

The National Data Guardian (NDG) advises and challenges the health and care system to help ensure that citizens' confidential information is safeguarded securely and used properly. The purpose is also to make sure that it is shared when appropriate to achieve better outcomes for patients. There are 10 standards which are clustered under leadership obligations to address people, process and technology aspects for which the quality of data forms a foundation.

The Information Commissioner's Office - ICO is the UK's independent body set up to uphold information rights. Their role is to uphold information rights in the public interest with data quality impacting on record keeping and end-use. Their site holds many useful resources relating to data management.

The General Data Protection Regulation - GDPR reshapes the way in which sectors manage data, as well as redefines the roles for key leaders. Article 5 and Article 47 paragraph 2 (d) specifically set out the importance of data quality and processing within the Regulation.

The Data Protection Act 2018 (2018) references GDPR throughout although some areas of data processing allow the UK to have flexibility and derogations and are therefore not covered under GDPR but are covered under the Data Protection Act 2018. The fourth data protection principle emphasises the importance of the quality of personal data before permitted transmission or availability.