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CONTENTS

1	Introduction.....	2
2	Purpose .....	2
3	Scope .....	2
4	Policy objectives .....	3
5.	Risks .....	3
6	Policy.....	4
6.1	Responsibilities .....	4
6.2	Policies, procedures, processes, systems.....	4
6.3	Security .....	5
6.4	Data quality assurance .....	5
6.5	Training .....	6
6.6	Review and communication.....	6
	Appendix A: returns and reports in Personnel Services .....	7
	Appendix B: Glossary.....	8

## 1 INTRODUCTION

The University has a data quality and data quality assurance policy approved by Council<sup>1</sup> to ensure that the quality of the data it produces complies with internal and external requirements. Personnel Services is required to have its own data quality policy aligned with the University's policy, and to add its own requirements.

High-quality data is the result of creating a culture that understands the importance of data accuracy and that is embedded in the organisation's operational, performance and governance arrangements. Such a culture needs the correct processes, systems, responsibilities and training to be in place, and this policy is part of those requirements.

## 2 PURPOSE

The aim of the Staff data quality policy is to mitigate the risks identified in section 5 (below), and to support the University's overarching data quality policy. The policy should ensure that Personnel Services collects and produces data that accords with the University's high data quality standards.

The audit committee of a higher education institution (e.g., Oxford University's Data Assurance Group – DAG) needs to be assured that the institution's management has assessed the risks posed by data accuracy and availability, and taken appropriate mitigation actions. A data assurance risk register<sup>2</sup> will be used for this purpose. In addition, care will be taken to guarantee the accuracy, validity, reliability, timeliness, relevance and completeness of the data, as well as compliance where required.

## 3 SCOPE

Personnel Services collects and produces data that is used by other University departments to create its own reports for use both within and outside the University. Personnel Services also uses data that is provided by other departments for its own internal and external reporting (e.g., staff data collected locally by departments, financial data, etc.)

The scope of this policy includes the data returns and reports compiled by Personnel Services listed below:

- HESA staff return
- Mandatory Gender Pay Gap
- Medical Schools Council Survey
- Annual Equality Report
- Race Equality Charter
- Athena SWAN Institutional

The policy applies to all staff involved in managing, collecting, collating and entering data.

Staff data also supports a range of internal and external functions and this policy will support all of the following areas, including, but not limited to:

- Research Excellence Framework
- Strategic Plan 2018-23
- HR Policy decision-making
- HESA Provider Profile
- Athena Swan departmental applications
- External surveys, e.g. ACE Museum and Society of College, National & University Libraries survey

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<sup>1</sup> [http://www.admin.ox.ac.uk/pras/aboutus/data\\_quality/](http://www.admin.ox.ac.uk/pras/aboutus/data_quality/)

<sup>2</sup> Available at [http://www.admin.ox.ac.uk/pras/aboutus/data\\_quality/data\\_risk/](http://www.admin.ox.ac.uk/pras/aboutus/data_quality/data_risk/) (risk register for individual data returns)

- Right to work compliance
- Public Sector Equality Duty
- Financial Statements
- Benchmarking surveys
- Equal Pay audit processes
- Provision of data to third parties under the requirements of the Freedom of Information Act

#### 4 POLICY OBJECTIVES

The data quality policy has six objectives:

- to ensure well-defined responsibilities;
- to ensure that proper policies, procedures, processes, systems and infrastructure are in place;
- to ensure the requisite level of security;
- to provide data quality assurance mechanisms;
- to ensure adequate training;
- to ensure proper review and communication

### 5. RISKS

- There are several potential risks in Personnel Services that could result from producing and issuing inaccurate data:
- Poor data could result in inappropriate decision-making by management across the institution.
- Inaccurate data could lead to a fine from the OfS or the HESA.
- Discrepancies between key external data returns could lead to funding adjustments.
- Poor data quality could lead to an inability to fulfil the University's Public Sector Equality Duty.
- Inaccurate data reported in external publications could cause reputational damage with public and private funders and other stakeholders, and the public. In turn, this could generate additional and burdensome attention placed on the institution.
- The University may fail to gain/maintain AthenaSWAN status, Living Wage accreditation and other awards, with both reputational and funding risks.
- Publication of data that has not be adequately data-assured could result in the unwitting misrepresentation of the University's staffing position or performance.
- Inaccurate data could give rise to challenge from staff under the provisions of the General Data Protection Regulations leading to a fine and potential adverse publicity.

## 6 POLICY

### 6.1 RESPONSIBILITIES

- 6.1.1 The Director of Human Resources delegates to a senior individual (the Head of HR Systems) the responsibility for ensuring data quality and compliance relating to the HRIS.
- 6.1.2 The Head of HR Analytics represents Personnel Services at the Data Assurance Group.
- 6.1.3 Human Resources Systems Evaluation Group (HRSEG) is responsible for review and update of processes, reference data, functionality changes and Personnel Policy changes, ensuring the HRIS is configured appropriately, that policies are correctly reflected, that procedures are designed appropriately and that training and access updated accordingly, and to maximise the ability to collect good quality data.
- 6.1.4 The person responsible for each external data return will also be responsible for producing a data assurance risk register for each return, using the template produced by the University.<sup>3</sup> The risk register should be based on a risk assessment. This procedure will be used for every other significant return or report.
- 6.1.5 Personnel Services is actively involved in a number of initiatives including Data Governance and Information Asset Management and this policy and related activities will be reviewed in the light of any outcomes from such projects.

### 6.2 POLICIES, PROCEDURES, PROCESSES, SYSTEMS

- 6.2.1 Major pieces of work which will be submitted to public bodies are subject to a formal review process, including sign off.
- 6.2.2 Personnel Services sections will ensure that data submission processes focus on securing data which is accurate, valid, reliable, timely, relevant and complete.
- 6.2.3 Personnel Services sections will ensure that maximum use is made of system functionality control mechanisms to minimise the scope of human error and prevent erroneous data entry, missing data or unauthorised data changes.
- 6.2.4 Personnel Services sections will ensure that HRIS user training, support and guidance is focussed on error minimisation.
- 6.2.5 Personnel Services sections will work closely with other areas of the University that manage staff data, to monitor data quality, particularly for data supplied to public bodies.
- 6.2.6 The HR Analytics team will ensure that users have access to data quality validation reports which identify errors and warnings for review and update. HR Analytics and HRIS Support Centre will support the work of departments to maintain data quality.
- 6.2.7 Data provision processes will be documented by the responsible data provider and be subject to periodic review as appropriate.
- 6.2.8 Guidance for HR Self Service users will enable staff to securely and easily maintain some elements of personal data, improving completeness and accuracy of data stored.

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<sup>3</sup> Available at [http://www.admin.ox.ac.uk/pras/aboutus/data\\_quality/data\\_risk/](http://www.admin.ox.ac.uk/pras/aboutus/data_quality/data_risk/) (risk register for individual data returns).

### 6.3 SECURITY

- 6.3.1 Data covered by this policy will only be disseminated via approved, secure methods.
- 6.3.2 Personnel Services sections will be responsible for ensuring that appropriate levels of security are in place to protect data and that they are in line with University and/or departmental policies.
- 6.3.3 HR Systems sections will ensure that data is stored in a secure environment not accessible by unauthorised users or systems.
- 6.3.4 All data handled within and shared by Personnel Services is subject to security standards and GDPR compliance requirements.

### 6.4 DATA QUALITY ASSURANCE

- 6.4.1 A risk assessment will be carried out for all statutory returns by the individual responsible for the return.
- 6.4.2 Risk registers will be updated as a result of a risk assessment and in advance of submitting the return.
- 6.4.3 Sign-off briefing documentation will be approved by the Head of HR Systems for HESA returns and will be submitted to DAG in line with the University's Data Quality and Data Assurance policies.
- 6.4.4 Sign-off briefing documentation will be approved by Personnel Committee and in some instances Council for all other returns.
- 6.4.5 Each risk assessment and risk register will be approved by the Head of HR Systems.
- 6.4.6 Audit files should be kept for each return which contains evidence of the source of the data and the scrutiny process.
- 6.4.7 Source data for all major returns is sourced from the HRIS, with data keyed by departmental users. Departments are responsible for ensuring good data quality. This responsibility is supported by:
  - 6.4.7.1 The HRIS Support team is responsible for communicating system and data issues to users via the monthly HRIS Bulletin.
  - 6.4.7.2 Central functions including HR Analytics, Payroll, HRIS Business Change Manager, Policy Team, and Reward Team are responsible for the provision of accurate and timely content to the monthly HRIS Bulletin process.
  - 6.4.7.3 The HR Analytics team are responsible for providing a data quality assurance programme to enable HRIS users of Personnel and Recruitment modules to reduce and eliminate data errors.
  - 6.4.7.4 The annual data quality assurance programme is the responsibility of and is undertaken by: HR Analytics, Data Services and departmental users. The programme is supported by tailored online support and guidance as well direct support available from the HR Analytics team.
  - 6.4.7.5 The HR Analytics team are responsible for providing data quality checking reports to users.
  - 6.4.7.6 HRIS users are responsible for keeping up to date with system and data notices provided via the HRIS Bulletin.

6.4.7.7 HRIS users are responsible for regularly running data quality checking reports and clearing data errors.

6.4.7.8 The HR Analytics Team are responsible for monitoring data quality error and warning counts, and also for following up with departments where error counts indicate non-compliance.

## 6.5 TRAINING

6.5.1 Personnel Services sections will put in place arrangements to ensure that members of staff have the knowledge and competencies for their role in relation to data quality.

6.5.2 Training is designed to ensure that HRIS users entering data have the knowledge and competencies for their role in relation to data quality.

## 6.6 REVIEW AND COMMUNICATION

6.6.1 The HR Data Quality Policy will be reviewed on an annual basis and/or when there is any updating of the University's overarching policy.

6.6.2 This policy is reviewed by the Data Assurance Group.

6.6.3 The updated policy is communicated to the HRIS user community via the HRIS Bulletin and is also made available on the HR Analytics team web pages.

APPENDIX A: RETURNS AND REPORTS IN PERSONNEL SERVICES

This table includes key reports and returns for the 2018-19 reporting year, using data sourced from CoreHR, but excluding those reports produced within the Finance Department.

<b>No.</b>	<b>Description</b>	<b>Deadline</b>	<b>Category</b>
1.	Annual Equality Report	January	Statutory
2.	Annual staffing figures	January	Policy
3.	Mandatory Gender Pay Gap	March	Statutory
4.	Key Performance Indicators	April	Policy
5.	HESA Provider Profile	May	Statutory
6.	HESA staff return	October	Statutory
7.	Medical Schools Council Survey	October	Other
8.	AthenaSWAN application data	October	Accreditation
9.	Financial Statements – pay ratios and £100k+ salaries	November	Statutory
10.	Race Equality Charter application data	December	Accreditation
11.	Equal Pay Audit	November	Policy
12.	DLA Piper Surveys	November & May	Policy
13.	Research Excellence Framework	Ongoing to October 2020	Other
14.	Departmental Payroll costings reports	Monthly	Other
15.	Russell Group Salary Survey	Ad hoc	Policy
16.	UCEA Salary Survey	Ad hoc	Policy
17.	Freedom of Information Act Requests	Ad hoc	Statutory
18.	Brexit Strategy Group	Ad hoc	Policy

## APPENDIX B: GLOSSARY

asset	item, thing or entity that has potential or actual value to an organisation
AthenaSWAN	<a href="https://www.ecu.ac.uk/equality-charters/athena-swan/">https://www.ecu.ac.uk/equality-charters/athena-swan/</a>
data	facts about an object
data quality	accuracy, completeness, validity and currency of the data
Data Services	Team within the HRIS Support Centre, responsible for data input for specified departments/areas within the University
dataset	identifiable collection of data
GDPR	General Data Protection Regulations
HESA	Higher Education Statistics Agency
HRIS	Human Resource Information System
HR Systems Evaluation Group	Representatives from central teams using CoreHR representing Personnel, Finance, Research Services, Pensions, Payroll, HRIS Support
information	meaningful data
information system	applications, services, information technology assets, or other information handling components; includes software, hardware, data, people and procedures
infrastructure	system of facilities, equipment and services needed for the operation of an organisation
objective	result to be achieved
OfS	Office for Students
policy	intentions and direction of an organisation as formally expressed by its top management
procedure	specified way to carry out an activity or a process
process	set of interrelated or interacting activities which transforms inputs into outputs
Public Sector Equality Duty	<a href="https://www.admin.ox.ac.uk/eop/policy/framework/">https://www.admin.ox.ac.uk/eop/policy/framework/</a>
quality	degree to which a set of inherent characteristics of an object fulfils requirements
REF2021	Research Excellence Framework 2021
return	report formally or officially on a specific matter
risk	effect of uncertainty on objectives
risk assessment	overall process of risk identification, risk analysis and risk evaluation
Risk register	Register of risks and their mitigations
RTI	Real Time Information – HMRC data feed
stakeholder	person or organisation that can affect, be affected by, or perceive themselves to be affected by a decision or activity
statutory requirement	obligatory requirement specified by a legislative body