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1 INTRODUCTION

The University has a data quality and data quality assurance policy approved by Council¹ to ensure that the quality of the data it produces complies with internal and external requirements. Human Resources 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 Human Resources 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 register² 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

Human Resources collects and produces data that is used by other University departments to create its own reports for use both within and outside the University. Human Resources 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 Human Resources listed below:

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

The policy applies to all staff involved in managing, collecting, collating, extracting 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 (e.g. EJRA)
- HESA Provider Profile
- Athena Swan departmental applications

¹ [Data Quality and Data Quality Assurance Policy.docx\(sharepoint.com\)](#)

² Available at <https://governance.admin.ox.ac.uk/data-risk-management> (risk register for individual data returns)

- External surveys, e.g. ACE Museum and Society of College, National & University Libraries survey
- Right to work compliance
- Public Sector Equality Duty
- Race Equality Task Force
- Research Staff Hub
- Financial Statements
- Benchmarking surveys
- Equal Pay audit processes
- Provision of data to third parties under the requirements of the Freedom of Information Act

The University's Health and Safety function sits under HR, however data relating to this area is not within scope of this policy.

4 POLICY OBJECTIVES

The data quality policy has six objectives:

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

5 RISKS

There are several potential risks in Human Resources 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 Athena SWAN status, and Living Wage accreditation and other awards, with both reputational and funding risks.
- Publication of data that has not been 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.
- Inaccurate and missing data results in staff time lost to identification and correction of errors resulting in time lost to normal, value-added staff duties.
- HR record counts are used as the basis for pricing of the University HRIS and inaccurate data could lead to unplanned penalties and price adjustments.

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 HR Systems Steering Committee, chaired by the Director of HR and made up of senior HR representatives from departments and divisions, provide governance and oversight on all systems investment which may drive improvements in data quality.
- 6.1.3 The Head of HR Analytics (or their nominated delegate) represents Human Resources at the Data Assurance Group.
- 6.1.4 Human Resources Systems Evaluation Group (HRSEG) supported by newly formed PeopleXD Product Ownership Groups made up of senior HR staff and system users from across the University, is responsible for review and oversight of updates to processes, reference data, and functionality changes.
- 6.1.5 The person responsible for key external data returns will also be responsible for producing a data assurance risk register for each return, using the template produced by the University.³ The risk register should be based on a risk assessment. This procedure will be used for every significant return or report as approved by the Data Assurance Group.
- 6.1.6 Human Resources is actively involved in a number of initiatives including Data Governance, Focus Programme⁴, Data Quality and Assurance Project 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 Human Resources sections will ensure that data submission processes focus on securing data which is accurate, valid, reliable, timely, relevant, and complete.
- 6.2.3 Human Resources 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 Human Resources sections will ensure that HRIS user training, support and guidance is focussed on error minimisation.
- 6.2.5 Human Resources 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, HR System Business Support and the Functional Analysis team 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.

³ Available at <https://governance.admin.ox.ac.uk/data-risk-management> (risk register for individual data returns).

⁴ <https://staff.admin.ox.ac.uk/focus-programme>

6.2.8 Guidance for Employee Self Service users will enable staff to securely and easily maintain some elements of personal data, improving completeness and accuracy of data stored.

6.2.9 Guidance for 'Self Service Managers' will enable managers to view elements of personal and contract information stored in the HRIS.

6.3 SECURITY

6.3.1 Data covered by this policy will only be disseminated via approved, secure methods.

6.3.2 Human Resources 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 HR Systems will own and maintain processes to support departmental "HR Systems Guardians" to effectively discharge their responsibility for ensuring that access to the HRIS is accorded only to the appropriate people within their department, by means of authorisation of the relevant user role.

6.3.5 All data handled within and shared by Human Resources 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 staff returns and will be submitted to the DAG in line with the University's Data Quality and Data Assurance policies. Final sign-off is completed by the Vice-Chancellor.

6.4.4 Sign-off briefing documentation will be approved by Personnel Committee and in some instances Council for all other returns, e.g. Mandatory Gender Pay Gap.

6.4.5 Each risk assessment and risk register will be completed by the responsible analyst and approved by the Head of HR Systems or the Head of HR Analytics, as appropriate.

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: the Service Owner (Head of HR Systems) and Service Manager (Team Lead, Functional Analysis) who work with the HRIS supplier to ensure the system is available and functionality is fit-for-purpose.

6.4.8 The HR Systems team is responsible for communicating system and data issues to users via the monthly HR Systems Bulletin and other appropriate communication channels.

6.4.9 Central functions including HR Analytics, Payroll, HR Systems Business Support, Policy Team, and Reward Team are responsible for the provision of accurate and timely content to the monthly HR Systems Bulletin process.

- 6.4.10 The HR Analytics team is responsible for communicating HR data quality issues via both a targeted, quarterly email send-out and a PeopleXD User Quarterly Briefing.
- 6.4.11 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.
- 6.4.12 The annual data quality assurance programme is the responsibility of and is undertaken by: HR Analytics and departmental users. The programme is supported by tailored online support and guidance as well as direct support available from the HR Analytics team.
- 6.4.13 The HR Analytics team are responsible for providing data quality checking reports to users.
- 6.4.14 HRIS users are responsible for keeping up to date with system and data notices provided via the HR Systems Bulletin, targeted data quality emails and PeopleXD User Quarterly briefings.
- 6.4.15 HRIS users are responsible for regularly running data quality checking reports and clearing data errors.
- 6.4.16 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 Human Resources 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 and annual updates are reviewed by the Data Assurance Group.
- 6.6.3 The updated policy is communicated to the HRIS user community via the HR Systems Bulletin, HR Analytics data quality newsletters and is also made available on the HR Analytics team web pages.

APPENDIX A: RETURNS AND REPORTS IN HUMAN RESOURCES

This table includes key reports and returns for the 2021-22 reporting year, using data sourced from PeopleXD, but excluding those reports produced within the Finance Department.

No.	Description	Deadline	Category
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.	Athena SWAN 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.	Departmental Payroll costings reports	Monthly	Other
13.	Russell Group Salary Survey	Ad hoc	Policy
14.	UCEA Salary Survey	Ad hoc	Policy
15.	Freedom of Information Act Requests	Ad hoc	Statutory
16.	Diversity dashboards – data for Athena SWAN and the RETF	October	Policy

APPENDIX B: GLOSSARY

asset	item, thing or entity that has potential or actual value to an organisation
Athena SWAN	Athena Swan Charter Advance HE (advance-he.ac.uk)
data	facts about an object
data quality	accuracy, completeness, validity and currency of the data
Data set	identifiable collection of data
EJRA	Employer Justified Retirement Age
GDPR	General Data Protection Regulations
HESA	Higher Education Statistics Agency
HRIS	Human Resource Information System
HR Systems Evaluation Group	Representatives from central teams using PeopleXD representing Personnel, Finance, Research Services, Pensions, Payroll, HR Systems
HR Systems Guardian	Senior person in department/division with responsibility for all matters relating to the University's HR System, including authorising system access: HR Systems Guardians HR Systems (ox.ac.uk)
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
Product Ownership Group (POG)	The HRIS is managed via a SaaS model and POGs were introduced to support this model, where software releases are automatically applied by the software supplier and POGs assist with evaluation of changes, impact and prioritisation of implementation
process	set of interrelated or interacting activities which transforms inputs into outputs
Public Sector Equality Duty	Equality analysis Equality and Diversity Unit (ox.ac.uk)
quality	degree to which a set of inherent characteristics of an object fulfils requirements
RETF	Race Equality Task Force
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
SaaS	Software as a service
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