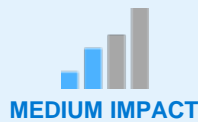




Review Sheet

Last Reviewed
31 Mar '21Last Amended
31 Mar '21Next Planned Review in 12 months, or
sooner as required.

Business impact



Changes are important, but urgent implementation is not required, incorporate into your existing workflow.

Reason for this review

New Policy

Were changes made?

Yes

Summary:

New: This policy outlines what is meant by data quality and establishes the processes to ensure that data quality issues are known and acted upon. The references are important to read and understand as they provide additional information and guidance on the management of data quality and how it fits in with wider data protection considerations.

Relevant legislation:

- UK GDPR
- Freedom of Information Act (2000)
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- Data Protection Act 2018

Underpinning knowledge - What have we used to ensure that the policy is current:

- Author: UK Government, (2020), *The Government Data Quality Framework*. [Online] Available from: <https://www.gov.uk/government/publications/the-government-data-quality-framework> [Accessed: 31/3/2021]
- Author: ICO, (2020), *Data Quality*. [Online] Available from: <https://ico.org.uk/for-organisations/accountability-framework/records-management-and-security/data-quality/> [Accessed: 31/3/2021]
- Author: Digital Social Care, (2021), *The Data Security and Protection Toolkit*. [Online] Available from: <https://www.digitalsocialcare.co.uk/data-security-protecting-my-information/data-security-and-protection-toolkit/> [Accessed: 31/3/2021]
- Author: Care Provider Alliance, (2021), *Digital Social Care*. [Online] Available from: <https://careprovideralliance.org.uk/digital-social-care> [Accessed: 31/3/2021]
- Author: Digital Social Care, (2020), *Data Security and Protection Toolkit: 'Standards Met' Guidance for Social Care Providers*. [Online] Available from: https://www.digitalsocialcare.co.uk/wp-content/uploads/2019/04/DSPTStandardsMetGuideASC_v7.pdf [Accessed: 31/3/2021]

Suggested action:

- Encourage sharing the policy through the use of the QCS App
- Share 'Key Facts' with all staff
- Ensure the policy is discussed in planned supervision sessions with relevant staff
- Ensure relevant staff are aware of the content of the whole policy

Equality Impact Assessment:

QCS have undertaken an equality analysis during the review of this policy. This statement is a written record that demonstrates that we have shown due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law.



1. Purpose

1.1 To have in place strong arrangements for managing the quality of the data collected and used by both Yewtree medical centre and its partners. This policy document sets out the approach of Yewtree medical centre to ensuring that:

- | Information is of high quality, accurate, valid, reliable, timely, relevant and complete
- | Data quality is fully embedded at Yewtree medical centre and is a key consideration in collecting, processing or using data
- | Any Care Quality Commission requirements are addressed
- | Decision making is supported

1.2 To support Yewtree medical centre in meeting the following Key Lines of Enquiry:

Key Question**Key Lines of Enquiry**

WELL-LED

HW2: Is there a clear vision and credible strategy to deliver high-quality sustainable care to people, and robust plans to deliver?

1.3 To meet the legal requirements of the regulated activities that {Yewtree medical centre} is registered to provide:

- | UK GDPR
- | Freedom of Information Act (2000)
- | The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- | Data Protection Act 2018



2. Scope

2.1 The following roles may be affected by this policy:

- | All staff
- | Registered Manager
- | Other management
- | Administrator

2.2 The following Patients may be affected by this policy:

- | Patients

2.3 The following stakeholders may be affected by this policy:

- | Commissioners
- | Local Authority
- | NHS



3. Objectives

3.1 To ensure that staff are aware of the need to assess the quality of the data collected and used by Yewtree medical centre.

3.2 To ensure that staff are aware of the structure of data quality management at Yewtree medical centre, and what to do if there are concerns.



4. Policy

4.1 Yewtree medical centre is committed to ensuring the quality of its data in order to promote effective decision making and Patient safety. High quality information means better Patient care and Patient safety, and there could be potentially serious consequences if information is not correct and up to date, both for Patients and for Yewtree medical centre as a whole.

Management information produced from Patient data is essential for the efficient running of Yewtree medical centre and to maximise utilisation of resources for the benefit of Patients and staff. It supports making effective decisions about the deployment of resources and also in demonstrating the value of the services provided by Yewtree medical centre.

Yewtree medical centre requires accurate, timely and relevant Patient information in order to support:

- | The delivery of effective, safe care
- | The delivery of its core business objectives
- | The monitoring of activity and performance for internal and external management purposes
- | Clinical governance and clinical audit
- | Service agreements and contracts
- | Accountability
- | Compliance with the Data Protection Act 2018 and UK GDPR (General Data Protection Regulation)
- | In order to be able to evidence compliance with regulatory requirements
- | Compliance with the Data Security and Protection Toolkit
- | Support effective decision making with regards to the deployment of resources

4.2 Producing robust data is an integral part of the operational, performance management and governance arrangements at Yewtree medical centre. The following are the six key characteristics/principles of good quality data

- | **Accurate** - Data should be sufficiently accurate for its intended purposes. The data is complete and unaltered. It is also protected from being changed or altered by unauthorised persons, any alterations are clearly marked and the person who made them can be identified
- | **Valid** - Data should be recorded in an agreed format and used in compliance with recognised standards of Yewtree medical centre and national standards
- | **Reliable** - The data is complete, accurate, has been created close to the time of the activity it records, and has been created by individuals with direct knowledge of the event it records
- | **Timely** - Data should be available within a reasonable time period, quickly and frequently enough to support information needs. This ensures informed decisions can be made based on up-to-date information rather than data that is out of date and potentially of less value
- | **Relevant** - Data captured should be relevant to the purposes for which it is used. This entails periodic reviews of requirements to reflect changing needs
- | **Complete** - All data captured should be based on the information needs of Yewtree medical centre and data collection processes matched to these requirements. Monitoring missing, incomplete or invalid records can provide an indication of data quality and can also point to problems in the recording of certain data items

4.3 The scope of this policy includes both hardcopy or digital copy records, and covers all data created by Yewtree medical centre, whether that relates to Patients, to staff or to other subjects, for example:

- | Finance and income
- | Information governance
- | Patient safety
- | Performance and statistics
- | Human resource management

4.4 Yewtree medical centre recognises that sometimes data is of unknown or questionable quality and that this presents huge challenges to effective Care delivery. Poor or unknown quality data weakens evidence, undermines trust, and ultimately leads to poor outcomes.



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4.5 Poor data quality makes Yewtree medical centre less efficient and impacts on decision-making. In order to make better decisions, it is understood that Yewtree medical centre needs to have good quality data to base decisions upon.

4.6 Yewtree medical centre will periodically review the sources of data that it uses and ensure that they are 'fit for purpose' and provide the information needed to support high quality Care.

4.7 Where it is assessed that the data is not needed, Yewtree medical centre will no longer collect or store the information. Where it has historical data, it will destroy the information in line with the Data Security and Data Retention Policy and Procedure, and will establish systems and processes to prevent further collection of data in this area.

4.8 Yewtree medical centre will ensure that the Data Security and Protection Toolkit for Social Care is understood, that assessments are completed and the principles are used to inform data quality at Yewtree medical centre.



5. Procedure

5.1 Dr Ayesha razvi will identify a person at Yewtree medical centre to be responsible for the monitoring of data quality. This person will normally be the Data Protection Officer, but maybe another individual named by the Registered Manager.

5.2 Yewtree medical centre will use standardised structures and layouts for staff and Patient records ensuring they meet the key characteristics of good quality data. Staff can refer to the following policies which highlight the processes at Yewtree medical centre in relation to record management in these areas:

- | Record Keeping Policy and Procedure
- | Service User Care Planning Policy and Procedure
- | Induction and Onboarding Policy and Procedure
- | Access to Information Policy and Procedure

5.3 All staff at Yewtree medical centre will be trained in the correct record keeping processes at Yewtree medical centre and must ensure that any information recorded is accurate and as complete as possible. This also extends to any systems the staff member has access to. Where information is found to be inaccurate, this must be reported to the Data Protection Officer, Sophie Whittaker, immediately.

5.4 Patients and staff will also be aware of how records can be accessed.

5.5 Data Correction

All individuals have the right to have access to their personal data which is held by Yewtree medical centre and where records are inaccurate or incomplete, they have the right for the record to be rectified. Yewtree medical centre will ensure that any requests are looked at in line with the Subject Access Requests Policy and Procedure.

Where information has been appropriately shared with a third party, the third party must also be informed of the change. A request for a rectification must be responded to within one month.

5.6 Data Destruction

Where data is destroyed, it will be done in a way that complies with regulations, best practice and other data protection policies.

5.7 When a third party is contracted to manage the disposal of personal information, or the hardware containing personal information, then the Data Protection Officer or identified individual will ensure that all contracts are up to date and that the third party meets all the required security arrangements regarding the destruction of personal information.

5.8 Data Assurances and Audit

By completing the Data Security and Protection Toolkit for Social Care (DSPTSC), data quality will be reviewed as part of the assurances supplied when submitting the completed assessment. Data quality is particularly relevant to section 1.7 of the toolkit.

5.9 Whenever Yewtree medical centre establishes a new process that involves the collection of personal data then the Data Protection Officer, or person identified to oversee data quality, will be involved. They will confirm that the collection is appropriate, necessary and that systems at Yewtree medical centre will support the effective and secure management of the personal data concerned. Yewtree medical centre will follow the Legitimate Interests Assessment Policy and Procedure for further information.

5.10 There will be an annual audit of data quality undertaken at Yewtree medical centre. This audit will include:

- | A review of all personal data held at Yewtree medical centre and confirmation that the data held is



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accurate, adequate and not excessive

- | An analysis of how the data is used, and a justification for the collection and holding of the data
- | An action plan to address any concerns or shortfalls in the quality of the data held at Yewtree medical centre
- | A review of historical data held at Yewtree medical centre to ensure that it is all meeting current retention schedules, and where data is no longer needed, it is destroyed in line with data protection requirements



6. Definitions

6.1 Data Quality

- | Is the term used to define whether data is accurate, adequate and ultimately 'fit for purpose'

6.2 DSPTSC

- | The Data Security and Protection Toolkit for Social Care
It is a self-assessment process established by the NHS to evidence that providers are meeting appropriate standards of data management, particularly focusing on the security and quality of data held. The toolkit has been updated to ensure that it is relevant to social care providers

6.3 Legitimate Interest Assessments

- | Legitimate Interest Assessments is a term that is not directly mentioned in the UK General Data Protection Regulation (GDPR). However, LIA is a form of risk assessment and should be conducted when your personal data processing is based on legitimate interest
- | Legitimate interests is one of the six lawful bases for processing personal data. You must have a lawful basis in order to process personal data in line with the 'lawfulness, fairness and transparency principle



Key Facts - Professionals

Professionals providing this service should be aware of the following:

- | Data quality is an important aspect of data protection and justifying the need for collecting and holding personal data
- | Yewtree medical centre will nominate an individual to oversee the processes underpinning data quality
- | All staff need to have an understanding of data quality and the implications for Patients and staff
- | There will be an annual audit of data quality, and any new data collection processes will be subject to a data quality assessment before being adopted



Key Facts - People affected by the service

People affected by this service should be aware of the following:

- | You can be assured that Yewtree medical centre only holds data that is accurate and in line with data quality characteristics
- | Should you have any concerns about any data held about you, you can speak to Yewtree medical centre about this



Further Reading

As well as the information in the 'underpinning knowledge' section of the review sheet we recommend that you add to your understanding in this policy area by considering the following materials:

Legitimate Interests Assessment Policy and Procedure



Outstanding Practice

To be 'outstanding' in this policy area you could provide evidence that:

- | Data quality is audited annually and the results are shared, with actions identified for improvement
- | All data quality assessments contribute to the completion of the DSPT
- | Evidence to support data quality is available to support any external assessment by the regulator, commissioner or other stakeholder
- | The wide understanding of the policy is enabled by proactive use of the QCS App



Forms

Currently there is no form attached to this policy.