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1 INTRODUCTION

The University's data quality and assurance policy, approved by Council¹, ensures that the quality of the data it produces complies with internal and external requirements. The People Department must align its own data quality policy with the University's, and incorporate its own specific requirements.

Creating a culture that understands the importance of data accuracy is vital for high-quality data. This should be embedded in the organisation's operational, performance and governance arrangements. Achieving this involves establishing correct processes, systems, responsibilities and training, 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 the People Department 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

The People Department collects and produces data which enables University departments to create their own reports for use within and outside the University. The People Department also utilises data provided by other departments for its own internal and external reporting requirements, such as locally collected staff and financial data.

The scope of this policy includes the following data returns and reports compiled by the People Department:

- Higher Education Statistics Agency (HESA) staff return
- Mandatory Gender Pay Gap Reporting
- Medical Schools Council Survey
- Annual Equality Report
- Race Equality Charter
- Athena SWAN Institutional application

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

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

- Research Excellence Framework
- University Strategic Plan 2018-24
- People Strategy
- HR Policy decisions
- 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 the People Department; however, data relating to this area falls outside the scope of this policy.

4 POLICY OBJECTIVES

The data quality policy has six objectives:

1. To ensure well-defined responsibilities.
2. To establish appropriate policies, procedures, processes, systems, and infrastructure.
3. To maintain the requisite level of security.
4. To provide data quality assurance mechanisms.
5. To ensure adequate training.
6. To facilitate proper review and communication.

5 RISKS

Inaccurate data poses several potential risks in Human Resources:

- Poor data could result in inappropriate decision-making across the institution.
- Inaccurate data could incur fines from the Office for Students (OfS) for the HESA staff return.
- Discrepancies in 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 attract unwanted attention for the institution.
- Failure to gain/maintain Athena SWAN status and Living Wage accreditation and other awards, poses reputational and funding risks.
- Publication of inadequately data-assured data could result in the unwitting misrepresentation of the University's staffing position or performance.
- Inaccurate data could lead to challenges from staff under the provisions of the General Data Protection Regulations resulting in fines and potential adverse publicity.
- Inaccurate and missing data results in staff time lost to identifying and correcting errors instead of focusing on value-added duties.
- HR record counts influence pricing of the University HR System, making accurate data essential to avoid penalties and price adjustments.

6 POLICY

6.1 RESPONSIBILITIES

- 6.1.1 The Director of Human Resources delegates data quality and compliance oversight for the HR System to a senior individual, the Head of HR Systems.
- 6.1.2 The People Digital Strategy Steering Committee, chaired by the Director of HR and made up of senior HR representatives from departments and divisions, provides governance and oversight for systems investment aimed at improving data quality.
- 6.1.3 The Analytics Team Lead for Business As Usual (BAU) in HR Systems, or their nominated delegate, represents the People Department at the Data Assurance Group, with senior HR representation also present at the Data Governance Group and Data Executive Group.
- 6.1.4 The individual responsible for key external data returns will produce a data assurance risk register for each return, using the template produced by the University.³ The risk register, based on a risk assessment, will be used for significant returns or reports, as approved by the Data Assurance Group.
- 6.1.5 The People Department actively participates in several initiatives, including Data Governance, Focus Programme⁴, and Digital Transformation Programme, ensuring that this policy and related activities align with the outcomes of these projects.
- 6.1.6 The HR Analytics team will work closely with the Equality Diversity Unit team to enhance colleagues' understanding of Equality Diversity Inclusion (EDI) data and drive improvements in EDI data quality for the benefit of staffing analysis and reporting.

6.2 POLICIES, PROCEDURES, PROCESSES, SYSTEMS

- 6.2.1 Major submissions to public bodies will be 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 People Department sections will utilise system functionality control mechanisms to minimise human error and prevent erroneous data entry, missing data, or unauthorised data changes.
- 6.2.4 People Department sections will ensure that HR Systems user training, support and guidance is focussed on error minimisation.
- 6.2.5 People Department sections will collaborate 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 Systems Analytics team will ensure that data quality validation reports which identify data errors and warnings are comprehensive and easily accessed by users.
- 6.2.7 The HR Systems Analytics team will collaborate with HR Systems Business Support to ensure that users have a sound understanding of their responsibilities in clearing any data issues identified.
- 6.2.8 The wider HR Systems team will work together in supporting the work of departments to maintain data quality.

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>

- 6.2.9 Data provision processes will be documented by the responsible data provider and be subject to periodic review as appropriate.
- 6.2.10 Employee Self-Service enables staff to maintain some elements of personal data securely and easily, improving completeness and accuracy of data stored. The use of this functionality is supported by readily available user guidance.
- 6.2.11 Manager Self-Service enables managers to view elements of personal and contract information stored in the HR System. The use of this functionality is supported by readily available user guidance.
- 6.2.12 The Onboarding functionality for new staff supports the capture of personal data at source in a timely manner, further improving the completeness and accuracy of data.

6.3 SECURITY

- 6.3.1 Data covered by this policy will only be disseminated via approved, secure methods.
- 6.3.2 People Department sections will ensure 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 supporting departmental “HR Systems Guardians” in authorising relevant access to the HR System only for appropriate individuals within their department.
- 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 following the risk assessment and in advance of submitting the return.
- 6.4.3 Sign-off briefing documentation for HESA staff returns will be approved by the Head of HR Systems and submitted to the DAG in line with the University's Data Quality and Assurance policies. Final sign-off will be completed by the Vice-Chancellor.
- 6.4.4 For all other returns, e.g. Mandatory Gender Pay Gap, sign-off briefing documentation will be approved by the People Committee and, in some instances, Council.
- 6.4.5 Each risk assessment and register will be completed by the responsible analyst and approved by the Head of HR Systems or the Analytics Team Lead for BAU, as appropriate.
- 6.4.6 Audit files containing evidence of data sources and scrutiny processes will be kept for each return.
- 6.4.7 Source data for all major returns is sourced from the HR System, with data entered by departmental users. Departments are responsible for ensuring data quality, supported by the Service Owner (Head of HR Systems) and Service Manager (People Systems Analysis and Insights Manager).
- 6.4.8 The Service Owner and Service Manager work with the HR System supplier to ensure the system is available and its functionality is fit-for-purpose.

- 6.4.9 The HR Systems team will communicate system and data issues to users via the monthly HR Systems Bulletin and other appropriate channels.
- 6.4.10 Central functions, including HR Systems, Payroll, HR Policy, and Reward, are responsible for the provision of accurate and timely content to the monthly HR Systems Bulletin process.
- 6.4.11 The HR Systems team is responsible for communications on HR data quality via regular bulletins, targeted email send-outs and PeopleXD User Quarterly Briefings.
- 6.4.12 The HR Systems Analytics team will provide a data quality assurance programme to help users of PeopleXD to reduce and eliminate data errors.
- 6.4.13 The annual data quality assurance programme will be undertaken by HR Systems and departmental users, supported by tailored online guidance as well as direct support from the HR Systems team.
- 6.4.14 HR System users are responsible for keeping up to date with system and data notices provided via the HR Systems Bulletin, targeted emails, and PeopleXD User Quarterly briefings.
- 6.4.15 HR System users are accountable for regularly running data quality reports, promptly clearing any data errors, and ensuring compliance with centrally set deadlines
- 6.4.16 The HR Systems Team will monitor data quality error and warning counts and follow up with departments, as needed.

6.5 TRAINING

- 6.5.1 People Department sections will put in place arrangements to ensure that staff have the necessary knowledge and competencies required for their role in maintaining data quality standards.
- 6.5.2 The HR Systems team will ensure that HR systems training fully addresses the importance of data quality and provides user-friendly guides to help departments in achieving this objective.
- 6.5.3 Training designed by the HR Systems team focuses on ensuring that system users responsible for data quality have the knowledge and competencies for upholding data quality.

6.6 REVIEW AND COMMUNICATION

- 6.6.1 The HR Data Quality Policy will undergo an annual review and/will also be updated whenever revisions are made to the University's overarching policy.
- 6.6.2 The Data Assurance Group is responsible for reviewing this policy and its annual updates .
- 6.6.3 The updated policy is disseminated to the HR System user community via the HR Systems Bulletin and is also accessible on the HR Systems team web pages.

APPENDIX A: RETURNS AND REPORTS IN PEOPLE DEPARTMENT

This table includes key reports and returns for the 2024-25 reporting year, using data sourced from PeopleXD, but excluding those reports produced within the Finance Department. Note that this list is not exhaustive.

No.	Description	Deadline(s)	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 & November	Statutory
7.	Medical Schools Council Survey	November	Other
8.	Athena SWAN application data	October	Accreditation
9.	Financial Statements – pay ratios and £100k+ salaries	October	Statutory
10.	Race Equality Charter application data	December	Accreditation
11.	Equal Pay Audit & follow-up	As required	Policy
12.	Departmental Payroll costings reports	Monthly	Other
13.	Russell Group Salary Survey	Ad hoc	Policy
14.	Brightmine 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
17.	Research Excellence Framework (2029)	As required	Statutory
18.	Resourcing and Diversity Overview Dashboards	Monthly	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
EDI	Equality Diversity Indicators
GDPR	General Data Protection Regulations
HESA	Higher Education Statistics Agency
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 HR System 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