NCG Data Policy

Policy Title	NCG Data Policy	
Policy Category	Compliant	
Owner	Director of Learner Data Services	
Group Executive Lead	Chief Information, Data and Estates Officer	
Date Written	May 2023	
Considered By	NCG Executive Board	
Approved By	NCG Executive Board	
Date Approved	June 2023	
Equality Impact Assessment	The implementation of this policy is not considered to have a negative impact on protected characteristics	
Freedom of Information	This document will be publically available through the Groups Publication Scheme.	
Review Date	July 2024	
Policy Summary	Data policy, following the approved NCG Data Strategy and linking to the NCG Learner Records Standard Operating Procedure.	
Applicability of Policy	**Consultation Undertaken**	**Applicable To**
Newcastle	Yes	Yes
Newcastle Sixth Form	Yes	Yes
Carlisle	Yes	Yes
Kidderminster	Yes	Yes
Lewisham	Yes	Yes
Southwark	Yes	Yes
West Lancashire	Yes	Yes
Group Services	Yes	Yes
Changes to Earlier Versions		
Previous Approval Date - September 18	Detail of policy absorbed into the NCG Standard Operating Procedures. New policy giving overall direction with detail linked to Standard Operating Procedures.	
July 2021	Amended list of standard operating procedures. Amended EDGAR to COCO and CIDO to CIDEO job titles.	
June 22	Minor changes to dates and addition of Curriculum Planning SoP	
Linked Documents		
• NCG SoP Curriculum Setup • NCG SoP Enrolment • NCG SoP Achievement • NCG SoP Apprenticeships • NCG SoP Maintenance of Records • NCG SoP Curriculum Planning • NCG SoP Timetabling	Detailed in Policy Annex – policy provides the framework and SoPs provide detailed guidance and KPIs	
NCG Fees Policy	Links to Enrolment and Curriculum Setup SoP	
NCG Apprenticeship Policy	Links to Apprenticeship SoP	
NCG Attendance Policy	Links to Maintenance of Records SoP	
NCG Data Protection Policy	Sets out obligations for all data processing.	
NCG Special Category and Criminal Data Policy	Sets out legal bases for processing such data and links to Data Protection Policy.	

Equality Impact Assessment

	Judgement	Explanatory Note if required
EIA 1 - Does the proposed policy / procedure align with the intention of the NCG Mission and EDIB Intent Statement in Section 2?	Yes	
EIA 2 - Does the proposed policy / procedure in any way impact unfairly on any protected characteristics below?		
Age	No	
Disability / Difficulty	No	
Gender Reassignment	No	
Marriage and Civil Partnership	No	
Race	No	
Religion or Belief	No	
Sex	No	
Sexual Orientation	No	
EIA3 - Does the proposed policy / processes contain any language / terms / references / phrasing that could cause offence to any specific groups of people or individuals?	No	
EIA4 - Does the policy / process discriminate or victimise any groups or individuals?	No	
EIA 5 - Does this policy / process positively discriminate against any group of people, or individuals?	No	
EIA 5 - Does this policy / process include any positive action to support underrepresented groups of people, or individuals?	No	

EIA 6 - How do you know that the above is correct?	The policy has been consulted with LDS leads and senior curriculum leads in all colleges (Learner Data Partners)

1. Scope and Purpose of Policy

The purpose of this policy is to set out the vision for data across NCG so that it is available in a timely, accurate and complete manner to underpin management decision making and fulfil regulatory obligations. This includes ensuring that reliable data is used to inform reports on both the quality of our provision and the funding income being generated by current activity.

2. Policy Statement

2.1. Aim for data

This Policy supports the NCG vision for data:

We believe data is the lifeblood of an organisation and effective data management has a vital contribution to make in delivering the NCG Strategy.

Our aim is for NCG data to be a trusted institutional asset, providing actionable insights, which will enhance the Group's reputation and underpin a culture of operational excellence.

Data held by NCG underpins success in all areas of activity across the academic community, professional services and external partners. It is also an essential requirement in terms of compliance. This is particularly important given the growing emphasis placed on data by regulators.

2.2. Overarching goals

The vision will be realised by focusing on three overarching goals.

We will provide quality data (measured in terms of relevance, presentation, completeness and accuracy. These are the dimensions of data quality) to inform effective decision making at strategic, tactical and operational levels. This commitment extends to the provision of data to external agencies for regulatory and funding purposes.

We will establish a high level of trust in the data provided to audiences inside and outside the institution. The credibility of our data assets is of paramount importance. Credibility will be measured in terms of the dimensions of data quality described above. The data governance framework set out in this document will make an important contribution here.

We will develop a data literate community with the professional capabilities necessary to make best use of data assets. Establishing a common data language including terminology, tools, skills and standard practises is an essential success factor. Clearly defined roles and responsibilities will be an important dependency for this goal.

2.3. Data principles

These principles will enable NCG to make informed decisions on how data is collected, managed, used and shared.

<u>Data is a valued NCG asset</u>

- Data must enhance the experience of staff and learners. It must be trusted, lawfully, fairly and transparently managed and have clearly defined purposes in support of the NCG strategic goals.

- Data collected and used by NCG is a critical resource, central to our success. It should be governed, considered and valued in the same way, as other valued assets such as people, buildings or money.

<u>Data is managed</u>

- Data will be professionally managed from identification of purpose, creation or collection, storage, sharing, protection, and use, taking account of value, nature and risk.

- Our culture will support discipline and professionalism across the data supply. Data will be managed according to its nature and value.

<u>Data is fit for purpose</u>

- Data will need to be of the right quality for its intended use. Fitness for purpose is more important than perfection. Quality characteristics will be pragmatic, appropriate and transparent.

- A common language to underpin productive discussions about data will be developed through well-defined purposes and shared definitions.

<u>Data is standardised, comparable and linkable</u>

- Data will use standard methods of recording individual data items across the Group and across systems with clear ownership and process to ensure maximum reuse and sustainability.

- Data will be standardised so it can be compared to data drawn from other systems and linked to create usable and informative datasets.

<u>Data is secured and subject to risk management</u>

- The security of data is assessed, monitored and managed in line with the data governance framework taking into account the nature and value of the data, regulatory and legal risks and operational requirements.

- The risks of sharing data are considered and balanced against the business need, ensuring that the security of the data is maintained, and it is made available to those with a legitimate need to access it.

<u>Data is made accessible and available</u>

- The default accessibility of data is open so it can be made available to the maximum number of people for the greatest number of uses.

- However, this availability must be considered in terms of proportionality, confidentiality and need.

2.4. Data governance roles and responsibilities

Chief Information, Data and Estates Officer

The Chief Information, Data and Estates Officer (CIDEO) has overall accountability for the quality of the organisation's data and is the institutional owner of the Data Strategy.

Chief Operations and Compliance Officer

The (COCO) has responsibility for assuring the Group Executive and NCG Board in terms compliance with legislation relating to data and information e.g. GDPR and FOI.

Data Protection Officer

The Data Protection Officer's role is inform and advise the business about its obligations to comply with the UK data protection legislation.

Data Owners

Data Owners are accountable for the quality of the datasets they own. They are senior stakeholders with decision making powers and the resources to authorise data quality initiatives (e.g. Executive Director of HR is the owner of the staff dataset).

To assist them with their responsibilities Data Owners are supported by Data Stewards.

Data Stewards

A Data Steward is responsible for the quality of data in one or more datasets. They are stakeholders with the expertise and capacity to carry out data quality activities as requested by the Data Owner or CIDEO. Data Stewards assist in delivering the responsibilities of their Data Owners and may work with one or more Data Practitioners to do so.

Data Practitioners

Data Practitioners are members of staff who capture, input or amend institutional data. They have significant job activities relating to data. E.g. LDS for learner data.

Data Users

Data Users are people who consume institutional data. These may be NCG colleagues or external stakeholders.

Appendix 1: NCG Standard Operating Procedures

Standard operating procedures will be developed to document key activities relating to each of the most significant datasets. This process has begun with learner data.

The NCG Learner Records Project, which ran from January to July 2019 drew together data, IT, quality and finance leads from all of the NCG colleges and Professional Services of NCG to agree a set of key guidelines, deadlines and data standards that would support data collection and data managers and comply with the contractual obligations to NCG's funding bodies. The outcome of the project was a set of standard operating procedures which contain the structures within which all parts of NCG will operate in relation to data, including key milestones, deadlines and Key Performance Indicators.

- Curriculum Planning: Detailing how curriculum is developed from the strategic to the operational level during business planning, with ownership sitting at the college SLT level, supported by professional services. This details when specific elements of plans are to be produced and how the finished course file is validated that will form the next year's curriculum.

- Curriculum Setup: Detailing how courses should be structured, what data should be included and the timescales for curriculum rollover and validation.

- Timetabling: Detailing a standard process and timeline for the collection, development and publishing of timetables prior to the new academic year.

- Enrolment: Detailing the process for application and enrolment, including what information must be collected prior to, at and immediately after enrolment.

- Achievement: Drawing heavily on and linked to the NCG Attendance Policy, this details when achievement should be actioned, what data should be recorded in different circumstances and how to deal with late achievement, re-sits and other non-standard situations.

- Apprenticeships: Apprenticeships are a very specific contract with differing deadlines and more detailed data requirements; therefore a specific SoP has been devised to detail data processes and requirements throughout the learner Journey from sign up to timely achievement.

- Maintenance of Records: Maintenance of compliant data is a contractual obligation between NCG and its funding bodies. This SoP details all of the checks local data teams must carry out on a weekly, monthly and annual basis, which checks Professional services will carry out; funding deadlines, learner census; funding claims and Key Performance indicators.

Many of these processes are supported by detailed work instructions and all will be reviewed as the NCG Data Review progresses, in line with developments to NCG processes and systems.