

## **Requesting new or changes to data collections in the further education system**

### **1. The process**

*The information authority* would like to make the process as open and transparent as possible.

The criteria list the key areas that *the information authority* secretariat will take into account when considering whether a request for data collection should be put forward to *the information authority* board.

It is important to note that meeting the criteria does not mean that the collection will be approved. The criteria are there to help the secretariat filter the requests so that only feasible requests for data collection go to *the information authority* board for consideration. The board's decisions will be based on what it thinks is in the best interests of the FE system as a whole.

### **2. Assessment criteria**

There is no particular order or sequence to these assessment criteria. Proposed data collections which are clearly failing in any one area are likely to be declined.

- a. *Well defined request with a robust business rationale:* The data request must make clear its overall aim and its benefits to the FE system.
- b. *Costs can be accommodated:* An estimate has been made of the costs that the Data Service and providers will incur due to return this data collection. Costs may include changes to MI systems, staff training, or any other costs associated with gathering the data. This estimated cost would need to be justified by the benefits of the change.
- c. *Supported by the relevant stakeholder organisation:* There needs to be support for the data request from a senior representative of the appropriate stakeholder organisation. *The information authority* can help to identify contacts within relevant organisations if necessary.
- d. *The best collection method has been identified:* There are a variety of data collections and so it needs to be clear that the method proposed is the most appropriate mechanism for collecting the data.
- e. *Benefit of collection outweighs the burden:* The benefit of gathering the data must outweigh the effort needed by providers to gather it, e.g. the change supports a key initiative or will produce other efficiencies in the system.

f. *Supports a key sector target or goal: The information authority board may support particular priorities for the FE system.*

g. *The collection has a realistic timescale: If the collection involves major changes, then there needs to be sufficient time for consultation with stakeholders and for the amendment to MI systems.*

h. *Data is robust enough to meet the business goal: The expected data collected needs to be of sufficient quality to meet the needs set out in the business rationale. If the data gathered is likely to produce a sufficient proportion of 'don't knows' then it may be deemed that there is no merit in collecting it.*

i. *The collection specification is consistent with data standards: Any data collection being proposed should be in line with existing data standards where possible.*

### **3. Submitting a new data collection request**

To enable *the information authority* to consider a data collection request, stakeholders need to answer the following questions:

- a. What objectives are you trying to achieve?
- b. What benefits will the collection bring to the FE system (nationally and locally, to individual employers, learners etc) This needs to be at a broad level to indicate how the FE system will be better off once this data is collected.
- c. What is the additional cost of the collection to providers and the Data Service? Where are the costs likely to be? How will this collection be funded? If providers are asked to pay to make the change, what benefits will they receive?
- d. How confident are you that the data requested is needed on a long-term rather than a short to medium-term basis? How have you established that there is a persistent need for this data? For this purpose, a persistent need is defined as for the next five years. What steps are being taken to avoid unnecessary year on year change?
- e. Have existing data collections been considered? Why is an additional collection needed for this data?
- f. If the data is to be used for monitoring please indicate what actions or interventions may happen and how these actions would generate benefits to the FE system.
- g. What will be done with the data e.g. processing, manipulating, reporting?

- h. What consultation has there been with your stakeholder group's representative organisation and other data users to ensure there is support for this data collection? What consultation has been done with providers and what were the results?
- i. Who will this data collection need to include?

It is recognised that the nature of data collections will vary. Rather than try to create one form or series of questions to cover all possibilities, only mandatory questions will need to be answered in the initial submission. The aim is to get a clear definition of what the proposed collection is trying to achieve and why the benefits of the collection will outweigh the burden created.

If there are issues which need clarification at this stage, *the information authority* secretariat may request additional information from the change owner before they can reach a decision. This information is likely to fall in one of the following areas:

- **Data specification and collection** - what specific data would be collected, how often and for which learners, staff or organisations.
- **Impact on data providers and MI services** - what is the likely impact on learning providers and/or the Data Service including changes to their systems, processes or both.
- **Data use & protection** - what will be done with the data, who will have access, how will data be protected etc.

#### 4. Consultation

*The information authority* will expect all relevant stakeholders to have been consulted on the proposed data collection. If necessary *the information authority* may be able to assist with this consultation. The consultation should seek to answer the following broad questions:

- a. What evidence is there, particularly from providers, that data can be supplied of sufficient quality to support the stated objectives? Can this data quality be achieved without increasing costs to providers?
- b. How wide has the consultation been on the proposed collection? This includes consultation with those wishing to use the data, with those supplying the data and, if appropriate, the data subjects.
- c. Is the information already collected by the providers, using the proposed classification and code values?
- d. If information is being deleted or amended, have all stakeholder groups been consulted to ensure that the information is no longer needed?

- e. What are the timescales for being able to implement this collection?
- f. What costs are providers likely to incur to gather and submit the information?
- g. What costs will the Data Service to incur to gather the data and provide reports? How will this be funded?
- h. Is there a better solution than the one being proposed?

## 5. Dispute procedure for declined collection requests

The dispute procedure is not a forum for re-submission of the same requests. Only the organisation submitting the request for the data collection is entitled to dispute the decision. The grounds for dispute will be limited to:

- failure to implement the collection will mean that a key sector target cannot be met
- or
- the assessment consideration process has not been followed correctly.

A member of *the information authority* secretariat will be nominated to act as a dispute manager and facilitate the dispute process. The dispute manager will have played no part in the original consideration of the collection request.

Reasons for the dispute will need to be provided in writing to the dispute manager. The dispute manager will then prepare copies of all relevant documentation for *the information authority's* Chair. The Chair will decide either:

- that the original decision was correct. The collection request was correctly declined and should be taken no further.
- or
- that there are grounds for dispute and a panel of board members should meet to consider the dispute. The panel will be made up of *the information authority* Chair and two other board members.

The output from the dispute panel will either be:

- that the request for the collection should proceed to the next stage
- or
- that the original decision was correct. The request for the collection was correctly declined and should be taken no further.

## 6. Fuller list of possible questions...

**Data specification and collection** - what specific data would be collected, how often and for which learners.

- a. What data elements do you really need in order to meet the objectives? Which are 'nice to have'? (If you feel all data elements are necessary, what will each be used for)?

- b. What standards are being used for the data collection? Have you used an existing standard and chosen wherever possible to use the highest one, for example ISO standards taking precedence over British Standards, over E-Gif standards. Are these widely used within the education / public sector? (And are they different to the standards being used currently in HR systems)? (Note: *the information authority* will provide advice on standards).
- c. What is the scope of collection for different types of providers i.e. when are they categorised as FE college, WBL or ACL provider? Please note these are categories which do not full cover the whole of the FE system and are based around a classification which is much less relevant from 2008/09 onwards when the LSC changes its funding methodology.
- d. What frequency of collection is required?
- e. How will the proposed data collection meet the objectives?
- f. What sort of additional costs will the Data Service incur adapting its systems in order to collect this data?

#### **Impact on data providers**

*The information authority* may want to know what the likely impact on learning providers will be.

- a. How can parity of esteem between different sorts of providers be achieved i.e. ideally a short collection from all providers?
- b. Is the information collected now by the providers, using the proposed classification and code values?
- c. If there are changes, how are these being made as easy as possible?
- d. Which providers are in scope to complete this field e.g. part / fully public funded/ not publicly funded and which staff within these providers?
- e. What sort of additional costs will providers incur to collect this data?

#### **Data use & protection**

*The information authority* may need information on precisely what will be done with the data that is produced.

- a. What will be done with the data e.g. processing, manipulation, reporting?
- b. Who will be able to access the data (raw/anonymised)?
- c. How will personal and personal sensitive data be protected?

- d. What reports will be presented back to the providers? How will these reports benefit providers?
- e. Given that data may be personal data and some of it personal sensitive data as defined by the Data Protection Act (1998), how much consultation have you undertaken with the data subjects and how have you addressed their concerns?