



HCCA Feedback on the Draft ACT Health Data Quality Policy and Framework

18 July 2013

Background

The Health Care Consumers' Association (HCCA) of the ACT was formed over 30 years ago to provide a voice for consumers on local health issues and now provides opportunities for health care consumers in the ACT to participate in all levels of health service planning, policy development and decision making.

General Comments

HCCA welcomes the opportunity to provide feedback on ACT Health's Data Quality Framework and Data Quality Policy. Data quality is an important issue for consumers, as the data obtained from health services is used to shape future service delivery and detect quality and safety issues. We support ACT Health's emphasis on collecting accurate and relevant data that is accessible to the public as well as service providers.

Overall, we are pleased with the Data Quality Framework and Policy, and believe it will encourage better practices regarding quality data maintenance. However, we would like to raise the importance of engaging with consumers during data collection and review processes in order to achieve the best possible outcomes.

Data Quality Framework

Relevance

It is essential that the data collected from ACT Health services is relevant to consumers and service providers. Consumers will be accessing the data that is made publicly available in order to make decisions about their own health care, so it is important to consider their information needs when determining what types of data are relevant and should be collected. Consultation with both consumers and service providers will also assist in identifying the types of data that may become relevant in the future.

Consumer engagement

We would like to emphasise that consumer engagement at the point of data collection has the potential to improve data accuracy and in turn the delivery of health services. Consumers also have a right to be involved in and provide feedback on the data collection process, as it impacts on the services that are available to them and their own health outcomes.

Accessibility

The public reporting of information gained from health service data is essential. As such, we welcome the inclusion of accessibility as a dimension of data quality in the framework. Consumers need to know what is going on in their health system. Consumers also value transparency and will welcome a focus on improving the availability of health service data and the processes involved in analysis and decision making based on the information obtained.

Data Quality Policy

Roles & Responsibilities

The Information Management Principles on page 6 of the Data Quality Framework recognise that the information obtained through data collection is intended to meet the needs of the ACT Government and the people who access their services, i.e. consumers. Yet consumers are not mentioned once in the Data Quality Policy. Under 'Roles & Responsibilities', it would be good to state that all staff have the responsibility to collect and handle patient data in a manner that will protect their confidentiality.

It is also the responsibility of clinical and administrative staff to respond to any data quality issues raised by the patient. Consumers are well placed to identify when their personal data has not been recorded accurately and it is their best interests to do so. Consumers may also identify quality issues within a particular health service where the collection and analysis of relevant data could assist in developing a solution.

While we note that most staff have a role in identifying and addressing data quality issues, it is unclear whether there is a clear review process for assessing the quality and accuracy of data. The review process for data quality should be clearly articulated, and should incorporate consumer involvement – both in the development of management strategies and in the review of the data itself. The Data Quality Framework recognises that improved data quality can lead to improved patient care, making it imperative that the patients themselves are able to provide input.

Evaluation

We suggest that another outcome measure for this policy could be: "Data quality issues are recognised and addressed in a timely manner". Following the

implementation of the Data Quality Framework, it will be important assess how effectively the existing data quality issues in the health system are being addressed.

Related Policies, Legislation and Standards

The Policy also needs to be linked to the National Safety and Quality in Health Service Standard 1: Governance for Safety and Quality in Health Service Organisations. This Standard addresses the need to create governance systems that support the improvement of health care services. The maintenance of quality, fit-for-purpose data is certainly relevant to this endeavour.

Definition of Terms

It would be good to define what is meant by 'data quality issues' and provide some examples. This broad term is used throughout the policy but gives no indication of the types of issues that staff may be likely to encounter. There also needs to be a definition provided for 'primary source system' to ensure that the document will be accessible for frontline staff that are unfamiliar with ICT jargon.

We are happy to discuss our feedback with you further.