Data Quality Strategy and Policy

Foreword

This document outlines Brentwood Borough Council’s Data Quality Strategy and the Data Quality Policy. The strategy sets out the council’s high-level objectives to improve data quality across the organisation. The policy identifies our approach to meeting the objectives set out in the strategy. Both the strategy and policy underpin the council’s Performance Management Framework.

The Council recognises the importance of reliable information to the delivery of efficient, economic and effective services. Data quality is crucial and the availability of complete, accurate and timely data is fundamentally important for the purposes of corporate governance; management and administration; service planning and accountability; and customer care.

The Council is committed to ensuring it maintains the highest standards of data quality and as a result gets its performance information right first time. All Council Directorates, Services, individual members of Staff and elected Members are required to adhere to the provisions of the Data Quality Strategy.

Councillor Louise McKinlay  Joanna Killian
Leader Brentwood Borough Council  Chief Executive
2. Introduction

Vision

Service users and members of the public more widely, need accessible information to make informed decisions about the Council’s activities and services. Those organisations monitoring the Council’s progress require reliable information to satisfy their responsibilities for making judgments about performance and governance arrangements.

As increasing reliance is placed on this information in performance management and assessment regimes, the need for reliable data has become even more critical.

Good quality data is essential for reliable performance and financial information to support decision making. The data must be sufficiently fit for purpose, representing in an accurate and timely manner the Council’s activities.

At the same time a balance needs to be struck between the importance of the purpose for which the information is intended and the cost of collecting the data to the necessary level of accuracy, detail and timeliness. The Council needs to determine its information priorities and put in place appropriate arrangements to secure the quality of data.

The Council is accountable for the money it spends and needs to demonstrate the achievement of value for money. The Council must therefore manage competing claims on resources to meet the needs of residents, and plan for the future.

The financial and performance information used to account for the Council’s activities, both internally and externally, to customers, partners, and those monitoring the Authority’s progress, must be appropriate for these purposes, providing the level of accuracy, reliability and consistency required.

To be confident that the Council is focusing on the key areas for improvement, those monitoring our performance - particularly the Audit Commission - need to be assured that reported information reflects actual performance. The quality of data is crucial to future assessments in terms of the Council’s annual Organisational and other corporate and individual service assessments.

The Council’s vision for data quality is that it will ‘get things right the first time’. This will enable the Council to have the right information at the right time at the right cost.

3. Key Drivers

The Audit Commission’s Standards for Better Data Quality provide a framework for data quality and are set out in the table below:
<table>
<thead>
<tr>
<th><strong>Accuracy:</strong></th>
<th>Data should be sufficiently accurate for their intended purposes, represented clearly and in enough detail. The need for accuracy must be balanced with the importance of the uses for the data, and the costs and effort of collection. For example, it may be appropriate to accept some degree of inaccuracy where timeliness is important.</th>
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<tbody>
<tr>
<td><strong>Validity:</strong></td>
<td>Data should be recorded and used meeting relevant requirements; organisations must measure what is intended to be measured.</td>
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<tr>
<td><strong>Reliability:</strong></td>
<td>Data collection should be a consistent process across collection points and over time. Managers should be confident that progress toward performance targets reflects real changes rather than change in data collection criteria.</td>
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<tr>
<td><strong>Timeliness:</strong></td>
<td>Data must be available quickly and frequently enough to support informed needs and to influence service or management decisions.</td>
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<tr>
<td><strong>Relevance:</strong></td>
<td>Data needs to be relevant to the purposes for which it is used. This will require periodic review of requirements to reflect changing needs.</td>
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<tr>
<td><strong>Completeness:</strong></td>
<td>Data requirements should be clearly specified based on need.</td>
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This framework will enable us to deliver the following:

- Improved use of Resources Score
- Improved focused services
4. Strategic Priorities

This strategy outlines Brentwood Borough Council’s quality strategic objectives. These are published in the Council’s Annual Council Plan and sit within the Performance Management Framework.

These are:

- To ensure that the information used by the Council is of high quality, consistent, timely, comprehensive and held securely and confidentially.

- To have in place arrangements at senior level to secure the quality of data used by the Council to manage services and demonstrate performance.

- To make clear what the Council expects from staff and Members in terms of the standards of data quality.

- To have in place systems, policies and procedures to ensure the highest possible data quality, particularly where information is shared with partners.

- To ensure the Council has in place the right resources, and in particular that staff have the right skills, to ensure timely and accurate performance information.

- To ensure that the right controls are in place to ensure the Council meets what is expected of it.

- To ensure that data is stored, used and shared in accordance with all relevant legal provisions including the Data Protection Act and Freedom of Information Act.

Principles of Data Quality:

Brentwood Borough Council is committed to ensuring that the data it produces adheres to the seven principles of data quality and the following underpin our objectives:

- **Awareness:** Staff and partners are aware of their responsibilities and recognise the need for good quality data.

- **Definition:** Policy and procedures are clearly defined, indicators are
smart and their reason for reporting is understood

- **Systems:** Are fit for purpose and operators are fully trained
- **Input:** Data is entered in a timely and accurate manner
- **Output:** Performance indicators are extracted regularly and efficiently and communicated quickly.
- **Evaluate:** Performance indicators are checked against accuracy, validity, relevance and completeness and signed off by Head of Service
- **Review:** Regular review is undertaken by services and the Senior Leadership Team to ensure Performance Indicators are appropriate, policy and procedures are being followed and are still current.

**Actions:** overview of how key priorities will be delivered.

**Priority 1 - Policy effectiveness**

<table>
<thead>
<tr>
<th>What we will do</th>
<th>Why we need to do it</th>
<th>How we will do it</th>
<th>When we will do it by</th>
<th>Impact on customer/resident quality of life</th>
<th>Responsible Officer/Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop process to update all key Strategic documents</td>
<td>To demonstrate the Council’s commitment to data quality.</td>
<td>Councils document library will include review dates for each strategy</td>
<td>February 2010</td>
<td>Will ensure that all Council objectives are based on sound and robust data.</td>
<td>Head of Business Improvement</td>
</tr>
<tr>
<td>Incorporate Data Quality as part of the assessment of risks</td>
<td>Each PI data and process will be risk</td>
<td>May 2010</td>
<td>Will ensure that all</td>
<td>Data Quality Group</td>
<td>Data Quality Group</td>
</tr>
</tbody>
</table>
corporate risk management arrangements associated with unreliable and inaccurate performance information. assessed as part of the Council’s risk management arrangements. Council objectives are based on sound and robust data.

Priority 2 - Data Quality awareness

<table>
<thead>
<tr>
<th>What we will do</th>
<th>Why we need to do it</th>
<th>How we will do it</th>
<th>When we will do it by</th>
<th>Impact on customer/resident quality of life</th>
<th>Responsible Officer/Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Data Awareness Training</td>
<td>To ensure that staff are aware of their responsibilities regarding data quality.</td>
<td>Develop programme for all staff to undertake and complete DQ awareness training</td>
<td>Decemb er 2010</td>
<td>Will ensure that all Council objectives are based on sound and robust data.</td>
<td>Data Quality Group</td>
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</table>

Priority 3 - Performance data and reporting

<table>
<thead>
<tr>
<th>What we will do</th>
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<th>How we will do it</th>
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<th>Impact on customer/resident quality of life</th>
<th>Responsible Officer/Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Performance reports contain correct and complete</td>
<td>To ensure that Members and Officers are provided with</td>
<td>Annotate and add detail to the performance monitoring reports that</td>
<td>Septem ber 2010</td>
<td>Will ensure that all Council decisions are based on sound</td>
<td>Data Quality Group</td>
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</table>
Priority 4 – Checks of Performance Information

<table>
<thead>
<tr>
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<th>Responsible Officer/Group</th>
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<tbody>
<tr>
<td>Regular checks of Key Performance Indicators</td>
<td>To ensure that Members and Officers are provided with information that is fit for purpose and can be used to support decision making.</td>
<td>To include checks of Key Performance indicators within the Internal Audit Workplan</td>
<td>April 2010</td>
<td>Will ensure that all Council decisions are based on sound and robust data.</td>
<td>Data Quality Group</td>
</tr>
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</table>

Member Engagement

This strategy was adopted by the Policy Board on the 10th March 2010 and will be monitored through the Council’s Overview and Scrutiny Committee in accordance with its responsibilities.
Resourcing the Strategy

Implementation of the Strategy will come partly from existing budgets and partly from Improvement East funding to deliver a risk assessment of the Council’s controls regarding performance indicators, review of Data Quality Framework and staff awareness workshop.

Timescale for Delivery

<table>
<thead>
<tr>
<th>Milestone</th>
<th>Delivered By</th>
<th>Commentary</th>
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<tbody>
<tr>
<td>Agreement of Data Quality Strategy and Policy</td>
<td>Data Quality Group</td>
<td>SLT and SMB to agree approval of Strategy and Policy to be presented to Policy Board on the 10\textsuperscript{th} March 2010.</td>
</tr>
<tr>
<td>Undertake Data Quality Awareness Training</td>
<td>Head of IT/Partner</td>
<td>To ensure all staff have undertaken appropriate training</td>
</tr>
<tr>
<td>Undertake a risk assessment of all performance indicators</td>
<td>Data Quality Group/Partner</td>
<td>To identify high risk PI's</td>
</tr>
<tr>
<td>Update all key strategic documents</td>
<td>Head of Business Improvement</td>
<td>To ensure that all documents meet Data Quality standards</td>
</tr>
<tr>
<td>Introduce regular monitoring of Performance Indicators</td>
<td>Head of Business Improvement/Internal Audit</td>
<td>To ensure that collection and reporting of PI's is accurate.</td>
</tr>
<tr>
<td>Review Data Quality Strategy and Policy</td>
<td>Data Quality Group</td>
<td>To ensure that both documents are up to date and relevant</td>
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Monitoring

The following will be monitored and reported:

- Progress on the Data Quality Strategy and Action Plan will be reported to Overview and Scrutiny Committee annually.
- Data Quality will be reviewed by Senior Management Board and Senior Leadership Team every three months.
- Data Quality will require monitoring/reviewing each month by owners and operational managers.
- That at each Data Quality Group meeting the number of actions whose status is red is reported.
- That data provided on treatments is provided to the Data Quality Group every quarter.
Data Quality Policy

The objective of this policy is to set out Brentwood’s approach to data quality, clearly defining responsibilities, training, monitoring and processes to ensure that data is right first time. It outlines Brentwood’s approach to improving data quality across the council as part of its drive to improve service delivery. This policy is available on the Brentwood Borough Council’s website, Intranet and My Performance for all managers and employees who have responsibility for providing or handling data and/or data information systems.

This Data Quality Policy underpins the council’s Performance Management framework and identifies the accountability for data quality throughout the organisation, which is the responsibility of every member of employee entering, extracting or analysing data from the performance management and other information systems.

Performance information is increasingly being used by external bodies to assess our performance, often as an alternative to inspection, and this trend is causing external bodies to place a bigger emphasis on data quality. In particular, the external audit approach of checking calculations and systems reports is evolving into a more challenging audit and scrutiny of systems controls.

Much work is already being undertaken to provide relevant information for managers and external audit, especially where concerns have already been identified. What is needed now is a co-ordinated approach to ensure that the highest standards are being met by us all.

This policy outlines the steps necessary to maintain the highest possible standards throughout the processes that result in recognisable performance information: from the establishment of PIs and their definitions, via the input of individual pieces of information to a system, to (in several but not all cases) the validation of an annual summary figure by an external auditor.

This policy sets out our commitment to having procedures and guidance for data quality in place, applied consistently and accessible and available to meet the users’ needs. Service Managers are responsible for regularly reviewing and reporting on compliance and non-compliance. Where appropriate this policy and relevant procedures and guidance will be reviewed and updated.
Awareness

The overall responsibility for data quality of a system needs to be clear. However, everyone inputting to the system has a responsibility to ensure that data is accurate and up-to-date.

Responsibility for data quality should be reflected in post profiles and the appraisal process. All services are encouraged to ensure that suitable appraisal targets and paragraphs in post profiles are included, outlining the level of involvement employees have in the PI process.

There is a collective responsibility for data quality, but it is necessary to be clear about what actions and responsibilities are allocated to specific individuals and teams in order to implement this strategy.

Corporate Policy and Performance team are responsible for co-ordinating and reporting all performance data to the Senior Management Board (SMB) and the Senior Leadership Team (SLT) on a monthly basis and Members, mostly on a quarterly basis. The SLT co-ordinate and oversee the Data Quality Policy is applied and reviewed regularly.

Monthly and quarterly performance and financial progress reports are received and monitored by a number of working groups and management teams. Members also take an active role in performance and financial management by receiving these reports through various committees and panels.

Annual performance outturns and Targets are prepared at year-end by the Service Managers within each Directorate and reproduced in the end of year report and Council Plan. These are then signed by the relevant Service Manager to verify the data is accurate and correct and then are passed to the relevant Head of Service and Executive Director for final verification and sign off and risk assessment.

Systems operational procedures and guidance is available in most service areas. As part of ongoing service arrangements where needed, these procedures will be strengthened or developed.

A database of all Performance Indicators is maintained by the Corporate Policy and Performance team. This details actual performance, targets, benchmarked data, and lead responsibility. The performance management system My Performance is the
source for all reports to SLT, SMB and all Members and these are also made available to the public on a quarterly basis.

It is important that employees have the necessary skills in relation to data quality and receive ongoing training and support to update skills, knowledge and awareness. All employees with data quality responsibility will be provided with a Guide to Data Quality. A continuous programme of Data Quality training is being developed and Data Quality training will be provided as and when necessary. The programme aims to address weaknesses identified through internal or external reviews of data quality and future developments that may impact on staff skills and capacity. Training notes will be made available on My Performance. The Corporate Policy and Performance team will be responsible for co-ordinating training, but it is the responsibility of the each service to identify areas of need and to ensure that all relevant employees are trained.

The Corporate Policy and Performance team will be proactive in advising relevant employees of changes which may affect data quality arrangements and will signpost them to the relevant information. All employees are responsible for ensuring they access this information and apply it appropriately. Key information sources will include:-

- My Performance homepage – this is developed and maintained by the Corporate Policy and Performance team and provides local standards, requirements, practices and monitoring arrangements. This will include the Council Plan, Database of Performance Indicators, the Data Quality Strategy and Policy, Management Reports to SMB and SLT, Benchmarking data and latest CPA/DCLG and Audit Commission bulletins.

- DCLG and Audit Commission Website access is available to all employees via My Performance providing national standards and requirement, statutory guidance and latest updates. Employees with responsibilities for data quality are encouraged to visit these sites.

Councillors will be trained on data quality at New Member Induction sessions. These sessions are in place to support them fulfilling their responsibilities to the local community and provide clear leadership and effective scrutiny of local council functions. All Councillors will be provided with a Guide to Performance Management and Data Quality. The Policy and Performance team will also provide one to one sessions to support Councillors in their performance management role.
Definitions

CPA indicators and NPIs have nationally set definitions. It is important that every detail of the definition is applied. This ensures that data is recorded consistently, allowing for comparison over time, and national benchmarking.

Where we are setting local PIs we need to ensure that we have established a clear definition and that there are systems available to collect and report the data in an agreed format. In particular, we need to be clear about whether target and outturn figures refer to a snapshot or cumulative position.

In some cases there are a number of similar indicators (some national and some local) measuring the same thing in slightly different ways. It is important to ensure that separate figures are calculated and reported systematically for each definition.
Every PI should have a named officer(s) who is/are responsible for collecting and reporting the information. This information will be kept on the Database of Performance Indicators maintained by the Projects and Performance team. This ensures that there is consistency in the application of definitions and use of systems for providing the data. Each named officer should be kept up to date of any changes in definition that may occur from time to time.

**Input**

Our aim is achieve a right first time principle for data input. System procedures should clearly set out how data should be entered and by whom. Each system should also produce a relevant audit trail.

Controls should be in place to avoid double-counting and inconsistent entry format. (For example the inputs of names and addresses into council information systems.) Controls should be designed according to the nature of the system, in particular where more than one person inputs data.

Data should be entered on an ongoing basis, not saved up to be entered in a block at the end of the period. This reduces the error rate and the need for complex verification procedures.

**Verification**

Where it is needed, a verification procedure should exist close to the point of data input. The frequency of verification checks will need to be aligned with the frequency of data reporting.

The simplest verification system might be a review of recent data against expectations, or a reconciliation of systems-produced data with manual input records. Depending on the complexity of the system, it might be necessary to undertake more thorough verification tasks, such as:

- data cleansing, e.g. to remove duplicate records or to fill in missing information;
- sample checks to eliminate reoccurrence of a specific error, e.g. checking one field of data that is pivotal to a PI against documentation, for a sample of cases;
• test run of report output, to check the integrity of the query being used to extract data; and

• spot checks.

Partnership working is an increasing method of local service provision and, therefore, there is greater reliance on data produced by other organisations. A number of PIs are calculated using information provided by contractors and the Council’s intention is to work alongside contractors to ensure that such data is accurate.

When entering into contracts with service providers it is essential that, wherever relevant, there is a requirement to provide timely and accurate performance information, and that we are clear with the contractor about their responsibilities for data quality and how we will be checking the information they provide.

It might not always be possible to alter existing contracts so that contractors are fully committed to providing an agreed quantity of performance data. In this case, the data must be treated initially as high-risk and thought given to establishing a system of checks and measures to ensure that we are confident about the accuracy of this data. When carrying out checks on such information it is important that this is documented and signed off by the relevant officer.

Some important performance information - for example, our satisfaction surveys and crime statistics - is provided directly to the council by external agencies. Brentwood’s intention is to work with other agencies constructively wherever possible to provide assurance and rectify any problems identified. A register of third party data sources such as data received and used from partners will be maintained by the Policy and Performance team within the Performance Indicator database.

Responsibility for data verification lies within Services, and where it becomes apparent that existing procedures are not sufficient to maintain a robust control environment Internal Audit and/or the Projects and Performance team can offer advice and guidance about verification procedures.

**Systems**

The council has a number of manual and IT based systems in operation for the collection, recording, analysis and reporting to secure the quality of data and ensure it is fit for purpose.

Each system should have a named officer responsible for data quality issues. The responsible officer is required to ensure that:

• users are adequately trained, where appropriate by having a formal training programme which is periodically evaluated and adapted to respond to changing needs;
there is security of access/amendment;
periodic tests of the integrity of data are undertaken;
information management and support is available to users;
system upgrades are made where necessary (including to accommodate amendments to PI definitions);
the system meets managers’ information needs;
feedback from users is acted upon;
the system can produce adequate audit trails;
actions recommended by system reviews (e.g. by the external auditors) are implemented;
a set of written procedures (user guide) exists for the purpose of extracting performance information; and
a business continuity plan for the system exists to protect vital records and data.

There should also be a named substitute officer who can deputise in the data quality lead’s absence by (at least) maintaining the day-to-day functionality of the system. Given the increasingly demanding timescale for performance reporting, the council cannot afford to have systems lying dormant during unplanned absences.

It is therefore, also essential that written procedures are available so that another officer can carry out the procedures essential to providing performance information if the officer who normally performs these duties is absent. ICT will be responsible for maintaining a corporate list of IT based system

Responsibility for delivering service improvements within systems lie with Services, but support will be available from ICT and Internal Audit. Where high-risk systems have been identified for attention, the following steps will need to be taken:

- analysis of the control environment;
- identification of gaps;
- design of additional controls and procedures to address gaps;
- preparation of an action plan; and
- monitoring the implementation of the action plan.
To ensure information systems are secure and in order to function under adverse circumstances, Business Continuity Plans for protection of records and data are produced. A Risk Register is also maintained and reviewed by the SLT.

These elements all exist to identify any potential weaknesses in systems and to ensure wherever possible the systems remain robust.

**Output**

This Data Quality Policy puts in place the arrangements and controls that are focused on securing data which is accurate, valid, reliable, timely, relevant and complete. Information used to report on performance is subject to a system of internal control and validation and reported data is actively used in the decision making process. Work continues on a number of other initiatives to improve and develop this area. We acknowledge that not all of our data will be 100% accurate eg. historical data, but we should be aware of the risk where it occurs.

Performance information will be given monthly to SLT for consideration as part of the pre committee review. Deadlines for these reports are available on the front page of My Performance.

Service/directorate review meeting of performance data (e.g. DMT which ‘signs off’ data before SLT considers report).

Verification and Sign Off of monthly/quarterly data is done by all Team Managers and Directorate Management Teams to ensure that the information supplied is accurate, relevant, valid and complete. This includes data for external reporting and checks undertaken on the reconciliation of data from operational systems. Data Cleansing and sample check operations are undertaken monthly, quarterly and/or annually, depending on level of risk identified from the Risk Register. This includes checks on interfacing between different information systems, matching and consolidating data from multiple databases, and maintaining outdated systems. Verification is done within a specifically identified verification period. Performance Reports are presented quarterly to SMB and SLT. Performance data is actively used to challenge how the council is performance against its key priorities and in informs decision making.

**Presentation**

All PI information is available through My Performance. The system has been set up to put the data into ‘books’ which present the data corporately, by directorate and down to team target level. Quarterly reports drawn from My Performance are provided to the relevant committees and panels. The information is also be available on the website and the Intranet.
Presentation – External Audit

During external audits, there should be at least one other officer who is able to provide advice and information on the PI in the absence of the lead officer. This is an important control to ensure that audit work proceeds smoothly.

When information is presented for external audit, the Officer who is responsible for signing off the performance information will review working papers to confirm that the definition has been followed, the calculations are correct and the indicator is supported by a full audit trail.

When compiling information for any PI being presented for external audit the following will be included:

- The calculation;
- system notes;
- explanation of any variance from the previous year;
- documentation supporting any estimates, sampling, or any apportionments made and all source information (e.g. spreadsheet, database, screen dumps), or at least a full description of where the supporting information is kept.

How this policy is monitored

There should a framework in place that provides effective arrangements for monitoring and reviewing performance in relation to data quality. The council will do the following:

SLT meet quarterly to review and monitor data quality throughout the organisation in line with this Policy. The group will discuss any data quality issues that have been raised eg from Internal Audit or Data Quality Champions. The group will report directly into SMB and also feedback any concerns to the Corporate Policy and Performance team.

The Corporate Policy and Performance team will review and monitor the implementation and delivery of the Data Quality Strategy and Policy and discuss any issues highlighted by SLT at DMT meetings and provide an overall policy steer and direction to Service Managers.
**Internal Audits**: The Internal Audit Team carry out audits as agreed in their Audit Plan. They will identify any issue they have with data quality. This should then be addressed in the feedback report. From this the Service must produce and implement an Improvement Plan.

**Benchmarking** exercises are conducted corporately and within some Directorates. The *Performance Indicator Database* maintained by Policy and Performance details data from neighbouring councils as well as England and Regional top quartile data. Brentwood is also a member of the Essex Policy and Performance Group which also provides the opportunity to review the effectiveness of our monitoring and review arrangements.

**Partnership Working**

The Council is committed to working with partners to achieve the priorities in the Corporate Strategic Plan, the Local Strategic Partnership’s Community Strategy and the Essex Local Area Agreement.

Information sharing is crucial to partnership working. The Council will ensure that a formal framework for data sharing with partners is put in place. A formal set of quality requirements will be applied to all data used by the Council which is shared externally, or which is provided by partner or third data party organisations.

These quality requirements could be in the form of a data sharing protocol, contract or service level agreement. The Council will ensure that a framework is put in place for identifying and complying with all relevant legal, compliance and confidentiality standards. A validation process will be established for all data provided by partners or other third parties.

**People development and communication**

The Council is committed to ensuring that its staff has the right skills to deliver services. Training and Development of staff is key to the achievement of high levels of data quality. The following principles will be met to achieve this:

- All new staff who uses Information Systems will receive training in the use of the respective systems.
- Policies, procedures and guidance will be developed in association with relevant staff and copies provided to all staff engaged in data quality work.
- Documents will be made available on the Corporate Intranet or on other knowledge management systems.
- Policies and procedures will be communicated to all staff. Awareness workshops or briefings will be held to develop awareness in the Council of the importance of Data Quality.
• An on-going and developmental awareness campaign will be undertaken, led by the Business and Improvement Service, to ensure that all members of staff are aware of the importance of accurate and timely data collection and recording.