



Data Governance Framework

DATA GOVERNANCE FRAMEWORK

VISION:

Wentworth Healthcare is committed to assuring our data stakeholders that we have developed and adopted a comprehensive data governance approach, including privacy and security.

PURPOSE:

To ensure an understanding and accountability for the successful management of data is clearly articulated and available, supporting data stakeholder trust.

SCOPE:

This Framework applies to all the data Wentworth Healthcare receives, generates, provides and reports upon for the whole of the data lifecycle.

Wentworth Healthcare definition of data governance incorporates concepts of:

DATA GOVERNANCE

Designates the source of authority for making decisions about data; the roles/structures authorised to make decisions; and the basis upon which decisions are made.

DATA MANAGEMENT

The planning, execution and oversight of policies and processes that acquire, store, protect, and deliver data and information assets.

INFORMATION TECHNOLOGY GOVERNANCE

Describes processes that ensure the effective and efficient use of Information Technology in enabling an organisation to achieve its goals.

GUIDING PRINCIPLES

Wentworth Healthcare – as a leader of primary health in the region and a direct service provider, commissioner of health services and an influencer of primary care – works collaboratively with our health data stakeholders to successfully manage the privacy and security in the overall lifecycle of all data we receive, generate, provide and report upon. The management of this primary care data is underpinned by overarching guiding principles that include:

Assurance:

Protecting the privacy of individuals and providers

Accountability:

Controlled management and use of data through legislative and policy obligations

Harnessing the power of data:

Preparing and making high quality, insightful data available to improve patient outcomes



Data Governance Framework

OVERVIEW

The Wentworth Healthcare Data Governance Framework (The Framework) is designed to define the minimum set of data governance practices associated with the acquisition, storage, management, analysis, sharing and protection of primary healthcare data. This framework guides Wentworth Healthcare in our role as data acquirers and data providers, in order to successfully manage the privacy and security of all data we receive, generate, provide, report upon and agree to share.

Consumer and healthcare provider trust are at the forefront of this Framework, which aligns to key standards, policies and strategies of the Australian Privacy Principles (APPs) within the Privacy Act 1988 (Cth), and the Notifiable Data Breaches (NDB) scheme.

The key objectives of the Framework are to:

- Define guiding principles, organisational structure and data related roles and responsibilities that underpin Wentworth Healthcare's data governance responsibilities.
- Articulate Wentworth Healthcare's well-developed data governance support processes, that ensure consistency and minimum standards for data governance are applied.
- Demonstrate to all data providers, data recipients, and their professional bodies that prior to Wentworth Healthcare undertaking any data sharing activities they have developed and adopted a comprehensive and trusted approach to data governance.

WHAT IS DATA GOVERNANCE?

Data governance is defined as:

“A system of decision rights and accountabilities for information-related processes, executed according to agreed-upon models which describe who can take what actions, with what data, and when, under what circumstances, using what methods.”

Whilst further distinctions can be made to clarify the differences in concepts between **data governance, data management and IT governance**, Wentworth Healthcare's Data Governance Framework incorporates these to support a broad approach underpinned by our overarching guiding principles for data governance.

POLICY STATEMENT

Wentworth Healthcare recognises the strategic importance and value of all data as a critical asset/resource. We prioritise the safety and security of data to ensure privacy is protected and our role as data custodians is trusted in our community. The protection of data is balanced with the safe and efficient sharing of data, to ensure that it's full worth is realised.

Wentworth Healthcare's values of *respect, ethical practice, continuous improvement, collaboration* and *quality* are integral components that frame our approach to the way we manage data, and our relationships with key stakeholders who contribute towards this valuable asset.

Anticipating the level of risk, both inherent and residual, and the controls required to reduce risk is a critical component of our data governance framework that participants need to understand. Based on the Company's Risk Appetite Statement, Wentworth Healthcare has assessed Data Governance as 'controlled' with respect to information and regulatory requirements. This means there is no appetite for unauthorised access to confidential data and a zero tolerance for non-compliance with regulatory obligations.

Wentworth Healthcare Board, Executive, Managers, Staff and Health Data Stakeholders are required to have an understanding of the Wentworth Healthcare Data Governance Framework, and to demonstrate accountability for the safe and secure management of all data in accordance with legislative and regulatory requirements.

WENTWORTH HEALTHCARE'S STRATEGIC PLAN

This underpins our commitment to quality healthcare.

VISION: Improved health and wellbeing for the people in our community

MISSION: Empower general practice and other healthcare professionals to deliver high-quality, accessible and integrated primary healthcare that meets the needs of our community

VALUES:



Respect



Ethical Practice



Continuous Improvement



Quality



Collaboration

WENTWORTH HEALTHCARE'S STRATEGIC OBJECTIVES

1. Increased capacity and influence of Primary Care

2. Culture of quality improvement and outcome focus

3. Coordinated services within and across sectors

4. Consumers engaged in all we do

5. Organisational excellence and impact

Wentworth Healthcare Data Governance Framework

Guiding Principles

Assurance, Accountability and Harnessing the Power of Data

**Data is
a Strategic
Asset**

**Data has
Clear
Stewardship**

**Data is
Secure
and Privacy is
Protected**

**Data is
Accessible**

**Data Quality
and Integrity
Improvement is
Essential**

**Principles of
Indigenous Data
Sovereignty**
are acknowledged and embedded

Data System Enablers

Organisation Structure
Organisational structures are the dedicated and / or virtual resources responsible for undertaking data governance activities

Policies
Policies define data governance requirements in alignment with the guiding principles

Processes and Procedures
Support the implementation of data governance capabilities in line with the program policies

Tools and Technology
Support data management activities and assist with compliance measurement of data governance policies, processes and procedures

Governance Controls

Establishes measures for monitoring data governance performance and actions to continuously improve the program

**Wentworth Healthcare's
Data Safe House**

DATA GOVERNANCE FRAMEWORK: THE MODEL EXPLAINED

Wentworth Healthcare’s commitment to ensuring the security, privacy and effective and consistent management of all Wentworth Healthcare data is strengthened by a robust data governance framework and a system that sets out key policies and procedures that enable organisational-wide accountability for ensuring our data is managed, used and protected in line with legal and community expectations.

The **Wentworth Healthcare Data Governance Framework** is comprised of **four key data system enablers** including *Organisation Structure; Policies, Processes and Procedures; Tools and Technology* and *Governance Controls*. Overarching the four key enablers are our **Guiding Principles** of *Assurance, Accountability and harnessing the power of data*. These are further strengthened by five underpinning and integrated **key data governance concepts** including *Data as a Strategic Asset (particularly Primary Health data); Data has Clear Stewardship; Data is Secure and Privacy is Protected; Data is Accessible; Data Quality and Integrity Improvement is Essential;* and the *Principles of Indigenous Data Sovereignty*. **Governance controls** support the monitoring and performance of the data governance system to continuously improve.

KEY DATA CONCEPTS

Incorporated within the overarching guiding principles are key data concepts that further articulate and strengthen our direction with data governance including:

Data as a Strategic Asset	Data has Clear Stewardship	Data is Secure and Privacy is Protected	Data is Accessible	Data Quality and Integrity Improvement is Essential	The Principles of Indigenous Data Sovereignty
Data is the foundation of our planning, decision making and operational functions. Given the sensitive nature of primary health data, care is taken to appropriately manage and govern the data through its lifecycle.	Data is managed in a way that is transparent with health data stakeholders and clear roles and responsibilities defined to ensure accountability.	Wentworth Healthcare is aware of the high standards that the community and health data stakeholders expect. Therefore, sensitive, and personally identifiable data are protected by the highest security standards and personally identifiable information is managed in accordance with legal, regulatory, and other relevant governance frameworks.	Data is easy to locate, used when required and is stored in a manner to ensure there is a single version of truth. Data is available and accessible to authorised individuals to help deliver insights on health trends and deliver population health improvements.	Data accuracy, consistency and reliability is maintained over its entire lifecycle to ensure our data is dependable for the purposes of planning, decision making and operational functions.	Acknowledged and embedded in the management and governance of primary healthcare data.

KEY ENABLERS

ORGANISATION STRUCTURE

The **Wentworth Healthcare Board** has ultimate responsibility for both accountability and obligation for ensuring that data governance is a robust and trusted system that meets the security, privacy, and effective and consistent management of all Wentworth Healthcare data. However, although the Board has ultimate accountability, at Wentworth Healthcare data governance is everyone's responsibility and, as such, specific data specific roles and responsibilities have been defined.

Such roles and responsibilities align to the needs of the data environment and the data risk boundaries which consider the types of datasets, the stakeholders involved, governance processes and the infrastructure that shapes the data environment. These roles and responsibilities are outlined below and further defined in the Wentworth Healthcare Data Specific Roles and Responsibilities Guidelines.

- ▶ The Board has appointed the **CEO** to provide oversight of the development of a data governance strategy and management. The **CEO, Executive and Senior Management** team have a responsibility to provide oversight with the implementation of data governance systems within the organisation. Where the implementation is delegated, a system of monitoring will be in place that provides a mechanism to confirm that the safety and security of data systems and processes are functioning effectively. The actions and decisions of the CEO, Executive and Senior Managers in relation to data governance is informed and supported by the '**Wentworth Healthcare Data Governance Committee**'.

- ▶ The **Wentworth Healthcare Data Governance Committee** is established to drive data governance and assist the CEO in fulfilling its responsibilities to Board. The Committee is responsible for directing the effective and efficient management of all Wentworth Healthcare data/ information assets in alignment with organisational priorities, legal and regulatory requirements; overseeing the appointment of appropriate data related roles and responsibilities; owning Wentworth Healthcare's data risks, including the identification and implementation of suitable data risk management controls; acting as an escalation point for decisions around disclosure of sensitive data; and managing Notifiable Data Breaches.

- ▶ **Key appointments** that support both the CEO and inform the Wentworth Healthcare Data Governance Committee to enable them to discharge data governance responsibilities, ensure the policy and strategy frameworks established by the Board are effectively operationalised, monitor organisational compliance and performance including the requirements to release or share of data to third parties are:
 - ▶ The **Chief Data Officer** has ultimate accountability for the data within the PHN, and for decisions related to data.
 - ▶ The **Privacy Officer**, performed by the Executive – Manager Operations Planning Integration, is the first point of contact for advice to staff on privacy matters.
 - ▶ Members of the Senior Executive Management Team are appointed as **Data Sponsors**. Data Sponsors are accountable for Wentworth Healthcare’s data assets and are responsible for establishing the rationale for Wentworth Healthcare holding data assets in their work domain; enabling the strategic management, governance and operation of data assets; providing direction and guidance, and authorising appropriate resources for management of data assets; ensuring adherence with all relevant legislation, policies, standards and procedures; and appointing Data Custodians and ensuring the Data Custodians’ duties are fulfilled.
 - ▶ **Data Custodians** are appointed by the Data Sponsors and are responsible for the day-to-day oversight, management and operation of a data asset in their work domain. This includes the location of data and metadata, approval of access to data and the overall completeness, quality and security of the data.

- ▶ Wentworth Healthcare **Managers and their Teams** are responsible for understanding, utilising and implementing Wentworth Healthcare’s Data Governance systems and processes, and for overseeing the day-to-day implementation of these systems in their respective program areas of responsibility.

- ▶ All **Data Users** are responsible for, and undertake to, handling data in accordance with Wentworth Healthcare’s policies and procedures; using data in accordance with the purpose for which their use is approved; taking reasonable steps to protect any confidential information from, inappropriate or unauthorised use, access or disclosure; reporting any security incidents or weaknesses to the Data Custodian; and attending training related to data governance.

- ▶ **Health Data Stakeholders** have responsibility in complying with best practice data governance and demonstrating competence in the management of their own data governance systems.

POLICIES, PROCESSES AND PROCEDURES

Wentworth Healthcare's internal data-related policies, processes and procedures are designed to ensure compliance with the legal and regulatory environment described above and to provide staff, especially those with delegated authority as custodians, with clear sources of information to perform their roles effectively and appropriately. It is the responsibility of all staff to observe and comply with this Framework and associated Wentworth Healthcare policies and procedures that include the following policy domains:

- **Data Governance**
- **Data Ethics and Breach**
- **Data Use, Retention and Disposal**
- **Data Privacy and security**
- **Data Sharing and Release**
- **Data Quality and Metadata**
- **Data Creation, Acquisition, Extraction, Transformation and Load**

Induction procedures for Wentworth Healthcare staff include an overview of the Data Governance Framework, related policies and procedures, and user responsibilities and accountabilities. This is in addition to all staff signing confidentiality agreements at the time of employment that clearly spell out their information security responsibilities and the consequences of breaching confidentiality.

TOOLS AND TECHNOLOGY

Data governance policies, processes and procedures alone do not ensure data governance success. To enable good data governance and ensure the effective implementation of our data governance framework, Wentworth Healthcare staff are supported by an appropriate mix of tools and technologies.

Wentworth Healthcare Data Specific Roles and Responsibilities Guidelines

Wentworth Healthcare has appointed data-specific roles including Data Sponsors and Data Custodians for each Wentworth Healthcare dataset it creates, acquires, uses, or interfaces with. The Wentworth Healthcare Data Specific Roles and Responsibilities Guidelines outline the key accountabilities of these roles, as well as guidance on tools and resources they might need, and other key considerations to ensure they can perform their roles effectively.

Wentworth Healthcare Data Asset Register

Wentworth Healthcare's Data Asset Register is a log of all datasets held and managed by Wentworth Healthcare. The register includes metadata about each dataset including but not limited to the following: the date of commencement; duration of use of the dataset (ongoing or finite); any caveats, for example restrictions on use of the data and/or notes regarding data quality; users; the purpose of the dataset; the relevant data custodians; and any data linkage information. This register provides Wentworth Healthcare staff with a single source of truth, assisting them to locate, access and understand relevant datasets and re-use them wherever possible. This not only helps to improve the value of Wentworth Healthcare's datasets, but also enhances data privacy and security.



Data Set Privacy Impact Assessment Toolkit

Wentworth Healthcare is committed to ensuring that effective risk and privacy management remains central to all its activities and is a core management competency. As such, Wentworth Healthcare conducts Privacy Impact Assessments (PIAs) on all its datasets which are then recorded in our Privacy Impact Assessment Register. Our Privacy Management Framework, Privacy Impact Assessment Toolkit and associated policies and procedures assist us to effectively manage and reduce the risks associated with all Wentworth Healthcare data – particularly health data.

Whilst Wentworth Healthcare takes all reasonable steps to prevent unintended disclosure of data, stakeholder information, datasets etc we recognise the importance of planning for the impact should such an event occur. Wentworth Healthcare has obligations under the Privacy Act 1988 (Cth) (Privacy Act) to secure personal information and must comply with the Notifiable Data Breaches (NDB) scheme. As such, Wentworth Healthcare has robust Data Breach Response Guidelines, Policies, and Procedures in place to identify, contain and assess data breaches to ensure timely and appropriate notifications are made, and investigations are undertaken to prevent similar incidents in future.

Information and Communications Technology (ICT) Systems

Wentworth Healthcare's ICT systems support the organisation's technology architecture that includes the storage, retrieval, manipulation, transmission and receipt of digital data and their interfaces, through both internal and external networks. A range of data governance systems and controls are applied to ICT systems to ensure safety and security are maintained.

GOVERNANCE CONTROLS

The data governance controls ensure that an appropriate level of governance exists and is maintained to support Wentworth Healthcare's data activities. These controls establish measures for monitoring data governance performance and actions to continuously improve Wentworth Healthcare's systems and approaches. Key measures of assessment address the formal structures that support good data governance including effectiveness of roles, committees, policies, procedures and risk management. Regular assessments and audits of control measures are conducted to determine their effectiveness.



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