

Data and application custodianship

Digital Standard

QH-IMP-469-3:2019

1. Statement

Queensland Health will assign appropriate roles and responsibilities to [Data Custodians and Application Custodians](#) to ensure that data and applications are fit-for-purpose and are managed effectively throughout their lifecycle.

The *Data and application custodianship standard* (the standard) outlines the minimum requirements to implement Queensland Health's [Data and application custodianship policy](#) (the policy). Implementation of the standard and its requirements will also support compliance with the Queensland Health [Information Management Framework](#), which sets out the governance, authorising and accountability environment, which underpin a robust information management culture.¹

2. Scope

This standard supports the Data and application custodianship Policy and applies to all staff within Queensland Health. Staff is defined as employees, volunteers, contractors, consultants, and managed service providers working for Queensland Health. Queensland Health consists of:

- The Department of Health, and
- Hospital and Health Services (HHSs).

Note: Queensland Health Digital Policies define minimum requirements based on statutory obligations and risk. Development of local artefacts by the Department of Health and HHSs is only required where the policy or standard does not address local business needs.

The scope of the standard is data and applications (clinical and non-clinical), including data in electronic or non-electronic formats created, collected, managed, stored, disseminated, and disposed of within Queensland Health.

¹ [Queensland Health, Information Management Framework, pg. 4.](#)

3. Requirements

3.1. Provide governance for data and application custodianship

3.1.1. Governance

- The Information Management Strategic Governance Committee (IMSGC)² provides the decision-making framework for data and application custodianship from a statewide perspective. The IMSGC is the governance committee for data and application custodianship, and shall:
 - Approve the appointment of statewide Data Custodians and Application Custodians.
 - Provide a point of escalation for strategic matters relating to data and application custodianship.
 - Approve strategies, roadmaps, policies, standards and guidelines, and other materials relevant to data and application custodianship.
- Department of Health and Hospital and Health Service (HHS) business areas shall ensure:
 - Implementation of data and application custodianship governance.
 - Data and application custodianship responsibilities that are delegated shall be in alignment with the delegation framework approved by the Data Custodian or Application Custodian.
 - All officers involved in the management, support and governance of data and applications understand their responsibilities and undertake the data and application custodianship, roles and responsibilities education and training available through the published online [Toolkit](#).
- Data Custodians and Application Custodians shall:
 - Escalate strategic matters relating to data and application custodianship to the IMSGC.
 - Undertake training through the data and application custodianship online [Toolkit](#).

3.1.2. Policy framework

- Health Informatics Services (HIS), eHealth Queensland, shall ensure:
 - Policies, standards, guidelines and relevant documents relating to data and application custodianship are developed, maintained and

² [eHealth Queensland, Information Management Strategic Governance Committee Terms of Reference](#).

regularly reviewed to ensure currency, relevance, consistency, and compliance with legislation.

- Consultation is undertaken with relevant stakeholders in the development of data and application custodianship policies, standards, guidelines and associated documents.
- Approved data and application custodianship documents are published and communicated to staff.
- Department of Health and HHS business areas shall ensure that local policies procedures and processes align with the [Data and application custodianship policy](#) and *Data and application custodianship standard*.

3.2. Assign roles and responsibilities for data and applications

3.2.1. Identification

- All new and existing projects and initiatives that manage data (including data collections) shall identify if data and application custodianship arrangements are in place by checking the [Queensland Health Information Knowledgebase \(QHIK\)](#).
- If no data and application custodianship arrangement is in place, or if there are changes required to the existing approved arrangement, then the project/initiative is to obtain formal approval for data and application custodianship roles. This is to occur at the earliest stage of the project/initiative as possible. The roles required are Data Custodian, Data Manager, Application Custodian and Application Manager.
- Prior to a project/initiative transitioning to business as usual, the approved roles of Data Custodian, Data Manager, Application Custodian, and Application Manager, shall be checked by the project/initiative area to ensure they are correct.
- Department of Health and HHS business areas are responsible for:
 - Implementing governance arrangements within their respective Department of Health/HHS business area to support the identification and confirmation of nominations.
 - Identifying data and application custodianship roles, including Data Custodian, Data Manager, Application Custodian and Application Manager.
- Formal approval for statewide Data Custodians and Application Custodians is through the IMSGC (via [HIS](#)).

3.2.2. Appointment

- Statewide Data Custodian and Application Custodian nominations shall be submitted to the IMSGC for approval.

- [HIS](#) shall lead the program of work to identify and formally appoint statewide Data Custodians and Application Custodians in conjunction with Queensland Health business areas.
- [HIS](#) shall facilitate the formal approval process and shall provide written confirmation to statewide Data Custodians and Application Custodians approved by IMSGC.
- Department of Health and HHS business areas are responsible for facilitating formal approval and providing written confirmation to those staff appointed in the roles of Data Custodian, Data Manager, Application Custodian, and Application Manager within their respective Department of Health/HHS business area.

3.2.3. Changes to data and application custodianship

- There are circumstances where data and application custodianship may change. Some examples include:
 - when a member of staff vacates a position (temporarily or permanently)
 - a change in the designated role/position
 - an organisational realignment.
- Department of Health and HHS business areas shall identify and seek advice from HIS in relation to changes to statewide data and application custodianship roles and confirm with HIS whether these need to be approved through the IMSGC.
- Not all changes to statewide data and application custodianship roles require IMSGC approval. For example, a change to the Data Custodians telephone number or a two week acting appointment in the Data Custodian role are considered minor updates and do not require IMSGC approval.

3.2.4. Delegation framework

- To ensure the most appropriate individuals (officers) can act autonomously to make decisions on behalf of a Data Custodian or an Application Custodian, if required, a Data Custodian or an Application Custodian may develop and implement a delegations' framework permitting the delegation of specified responsibilities to appropriately qualified staff, as detailed in the [Data and application custodianship roles and responsibilities](#) document.

3.2.5. Escalation process

- Department of Health and HHS business areas are to attempt to resolve matters directly that may arise in relation to data and application custodianship roles. This may require involvement of Senior Executives, where necessary.

- The IMSGC provides an escalation point for strategic data and application custodianship matters.

3.2.6. Education and training

- Officers involved in the management, support and governance of data and applications, including Data Custodians and Application Custodians, shall have access to education and training materials.
- Access to education and training material shall be provided through the data and application custodianship online [Toolkit](#).
- HIS shall coordinate the development of training and education materials and shall maintain the online [Toolkit](#).
- Subject matter experts from Department of Health/HHS business areas shall contribute relevant material for inclusion in the toolkit.

3.3. Maintain a single data and application custodianship register

3.3.1. Manage and maintain

- A single register for metadata relating to data and application custodianship for Queensland Health shall be managed and maintained. [QHIK](#) is being leveraged as the single data and application custodianship register.
- HIS shall:
 - Manage and maintain the single register.
 - Ensure that changes in key custodianship roles that have been approved through the IMSGC, are recorded in the single register as soon as practicable.
- Department of Health and HHS business areas shall ensure that the single register is current by reviewing and requesting updates to the content where required, including the key data and application custodianship roles; Data Custodian, Data Manager, Application Custodian and Application Manager.
- Updates to the content of the data and application custodianship single register can be provided by contacting HIS by email at eHealth-IMStrategy@health.qld.gov.au or completing the online [Data and application custodianship enquiry and submission form](#).
- Department of Health and HHS business areas may maintain a local register for their own reference. However, QHIK is the approved single data and application custodianship register.
- Where a Department of Health or HHS business area maintains a local register of data and application custodians, the Department of Health or HHS business area shall:

- Inform HIS of the local register, and where possible, a link shall be incorporated to the single register.
 - Maintain the local register to ensure it is current.
- 3.3.2. Publish
- HIS shall ensure:
 - Key statewide data and application custodianship roles, including Data Custodian, Data Manager, Application Custodian and Application Manager, are published in the single register, [QHIK](#).
 - The [List of approved Data and Application Custodians for Applications](#) and/or [List of approved Data Custodians for Data collections](#) approved by the IMSGC are published on the [Queensland Health Electronic Publishing System \(QHEPS\)](#).

4. Legislation

- [Human Rights Act 2019 \(Qld\)](#)
- [Hospital and Health Boards Act 2011 \(Qld\)](#)
- [Information Privacy Act 2009 \(Qld\)](#)
- [Mater Public Health Services Act 2008 \(Qld\)](#)
- [Mental Health Act 2016 \(Qld\)](#)
- [Private Health Facilities Act 1999 \(Qld\)](#)
- [Public Health Act 2005 \(Qld\)](#)
- [Public Records Act 2002 \(Qld\)](#)
- [Public Sector Act 2022 \(Qld\)](#)
- [Right to Information Act 2009 \(Qld\)](#)

5. Supporting documents

Queensland government:

- [Queensland Government Enterprise Architecture \(QGEA\) Information asset custodianship policy – Information Standard \(IS44\)](#)
- [Queensland Government Enterprise Architecture \(QGEA\) Records governance policy](#)

Queensland Health:

- [Data and application custodianship policy \(QH-POL-469:2019\)](#)
- [Data and application custodianship roles and responsibilities](#)
- [Data and application custodianship roles and responsibilities - Summary Poster](#)
- [Data and application custodianship eLearning course](#)

- [Data and application custodianship enquiry and submission form](#)
- [Data and application custodianship FAQs](#)
- [Data and application custodianship – Further resources and supporting documents Fact Sheet](#)
- [Data and application custodianship – Overview Fact Sheet](#)
- [Data and application custodianship process](#)
- [Data and application custodianship: Toolkit](#)
- [Information asset standard](#)
- [Information Management Framework](#)
- [Information Management Framework – Summary Poster](#)
- [List of approved Data and Application Custodians for Applications](#)
- [List of approved Data Custodians for Data collections](#)

Department of Health:

- [Clinical Records Management policy \(QH-POL-280:2014\)](#)
- [Corporate Records Management policy \(QH-POL-467:2019\)](#)
- [Data Access Management](#)
- [Data management policy \(QH-POL-279:2014\)](#)
- [Data management standard \(QH-IMP-279-4:2023\)](#)
- [Data supply requirements documentation standard \(QH-IMP-469-2:2019\)](#)
- [ICT service continuity management policy \(QH-POL-457:2018\)](#)
- [ICT service continuity management standard \(QH-IMP-457:2018\)](#)
- [Management and access to documents and records Fact Sheet](#)
- [Retention and disposal of clinical records standard \(QH-IMP-280-1:2014\)](#)
- [Statistical and corporate data standardisation standard \(QH-IMP-469-1:2019\)](#)

6. Definitions

Term	Definition	Source
Application	A software system deployed by the agency which has part of an agency's business process embedded with it.	Data and application custodianship roles and responsibilities

Term	Definition	Source
Application Custodian	A position designated with overall accountability and responsibility for decision making in relation to the ongoing development, management, compliance, care and maintenance of an application to support business needs.	Data and application custodianship roles and responsibilities
Application Manager	A position designated with responsibility for the day-to-day management of an application including the planning, development, compliance, installation, configuration, maintenance and support of the application.	Data and application custodianship roles and responsibilities
Data	The representation of facts, concepts or instructions in a formalised (consistent and agreed) manner suitable for communication, interpretation or processing by human or automatic means. Typically comprised of numbers, words or images. The format and presentation of data may vary with the context in which it is used. Data is not information until it is utilised in a particular context for a particular purpose.	Data and application custodianship roles and responsibilities
Data Custodian	A position designated with overall accountability and responsibility for decision making in relation to the data set, data collection and/or application allocated and the ongoing capture, compliance, development, management, care and maintenance of data to support business needs.	Data and application custodianship roles and responsibilities
Data Manager	A position designated with responsibility for the day to day capture, management,	Data and application custodianship roles and responsibilities

Term	Definition	Source
	maintenance, operation, compliance, interpretation and supply of data.	
Delegate	An appropriate individual (officer) with delegated authority to act autonomously and make decisions on behalf of a Data Custodian and/or Application Custodian.	Data and application custodianship roles and responsibilities
Fit-for-purpose	Data is accurate, valid, reliable, timely, relevant and complete.	Data Quality Framework
Information	Information is any collection of data that is processed, analysed, interpreted, classified or communicated in order to serve a useful purpose, present fact or present knowledge in any medium or form. This includes presentation in electronic (digital), print, audio, video, image, graphical, cartographic, physical sample, textual or numerical form.	Queensland Government Enterprise Architecture Glossary
Information asset	An identifiable collection of data stored in any manner and recognised as having value for the purpose of enabling an agency to perform its business functions, thereby satisfying a recognised agency requirement.	Queensland Government Enterprise Architecture Glossary
Record	Recorded information created or received by an entity in the transaction of business or the conduct of affairs that provides evidence of the business or affairs and includes - <ul style="list-style-type: none"> a) anything on which there is writing; or b) anything on which there are marks, figures, symbols or perforations having a meaning 	<i>Public Records Act 2002</i> , Schedule 2, Dictionary.

Term	Definition	Source
	<p>for persons, including persons qualified to interpret them; or</p> <p>c) anything from which sounds, images or writings can be reproduced with or without the aid of anything else; or</p> <p>d) a map, plan, drawing or photograph.</p>	
Statewide	Queensland Health (statewide) significance or impact more than one HHS and/or Department of Health.	Data and application custodianship roles and responsibilities

7. Standard revision and approval history

Custodian	Deputy Director-General, eHealth Queensland
Standard Manager	Director, Health Informatics Services
Committee governance	Information Management Strategic Governance Committee
Approval authority	Director-General

8. Compliance strategy

Level of risk/risk rating	Medium
Audit strategy	Compliance Attestation required from Health Service Chief Executive and Department Executive Leadership Team member
Audit tool	Self-assessment of applicability and compliance
Audit frequency	Three years
Audit responsibility	Digital Policy Unit, eHealth Queensland

Version Control

Version	Date	Comments
1.0	1 July 2019	New Department of Health standard approved.
2.0	26 November 2019	Links updated in the Department of Health standard to the uplifted Queensland Health Data and application custodianship policy (QH-POL-469:2019)
3.0	16 September 2020	Approved by the Director-General as a Queensland Health standard. This new Queensland Health standard replaces the previous Department of Health standard. This Queensland Health standard applies to both the Department of Health and Hospital and Health Services.
4.0	7 November 2022	Three-year cyclic review undertaken. Transferred to new template, content reviewed and update of links and references as a result of organisational changes. Endorsed by the Information Management Strategic Governance Committee and Architecture and Standards Committee. Approved by the Director-General.
4.1	27 September 2023	Update the Public Sector Act 2022 and links in the Legislation section and links to resources in the Supporting documents section for currency.