

Data and application custodianship

Digital Policy

QH-POL-469:2019

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.

2. Purpose

The intent of this policy is to:

- ensure the [Data and application custodianship roles and responsibilities](#) are implemented
- ensure officers involved in the management, support and governance of data and applications, are supported with appropriate education and training materials
- ensure a single register, that will include statewide Data Custodians and Application Custodians details, is established, maintained and available
- establish consistent processes for the identification and registration of Data Custodians and Application Custodians
- facilitate compliance with the Queensland Government Enterprise Architecture (QGEA) [Information asset custodianship policy - Information Standard \(IS44\)](#).

3. Scope

This policy 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 policy 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.

The statewide Data Custodian is separate to the HHS Data Custodian. The HHS Data Custodian has responsibility and overall accountability for decision making in relation to

data custodianship matters that are relevant to a particular HHS or individual health facility data for their own purposes.

The HHS will continue to provide data custodianship for their particular HHS or individual health facility¹.

The role and responsibilities between a statewide Data Custodian/Application Custodian and a HHS Data Custodian/Application Custodian do not differ. It is the scope of overall responsibility and accountability that differs.

Whilst it is recognised that 'data' and 'information' are defined differently (see Definitions section); in the context of data and application custodianship and from a legal perspective, the terms are synonymous. The term 'data' is usually taken to imply 'information', and vice versa.²

This approach is supported by other jurisdictional policies, Data Management Association (DAMA) dictionary of terms, and is referred to in the Fact Sheet on the [Management and access to documents and records](#)

4. Principles

- **Governed** – Roles and responsibilities are clearly defined and formally assigned through approved governance.
- **Managed** – Data Custodians and Application Custodians are identified and formally appointed, and details are recorded and maintained in a single register.
- **Transparent** – The process of identification and formal approval of Data Custodians and Application Custodians is undertaken collaboratively and is available and shared.
- **Valued** – Data and applications are recognised as strategic assets.
- **Standardised** – Data and application custodianship terms and definitions are standardised and consistent across Queensland Health.

¹ Queensland Health, 2021, [Data and application custodianship roles and responsibilities](#), pg. 7.

² Queensland Health, 2021, [Data and application custodianship roles and responsibilities](#), pg. 6.

5. Requirements

Queensland Health must:

5.1. Provide governance for data and application custodianship

- 5.1.1. Formally appoint statewide Data Custodians and Application Custodians through the information management governance structure detailed in the [Information Management Framework](#)³.
- 5.1.2. Governance arrangements are to be implemented within Department of Health and HHS business areas to support the identification and confirmation of data and application custodianship nominations.
- 5.1.3. Maintain, review and communicate the *Data and application custodianship policy* and associated documents.

5.2. Assign roles and responsibilities for data and applications

- 5.2.1. Assign roles and responsibilities for the administration and management of data and applications.
- 5.2.2. Data Custodian and Application Custodian roles and responsibilities are to be applied as per the [Data and application custodianship roles and responsibilities](#) document.
- 5.2.3. Ensure that Data Custodians and Application Custodians are provided with necessary education and training that is reflective of their roles and responsibilities.
- 5.2.4. [Training materials](#) are made available to officers whom have an interest or are involved in the management, support and governance of data and applications.

5.3. Maintain a single data and application custodianship register

- 5.3.1. Establish and maintain a single register that will include statewide Data Custodian and Application Custodian details.
- 5.3.2. Assign roles for the management of the single register.
- 5.3.3. The single register will be available online.
- 5.3.4. Department of Health and HHS business areas may maintain a local register for their own reference.

³ Queensland Health, 2021, *Information Management Framework*, Figure 5: Information management governance structure, pg. 15.

6. 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 \(Qld\)](#)

7. 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 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 standard \(QH-IMP-469-3:2019\)](#)
- [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 \(QH-IMP-469-1:2019\)](#)

8. 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
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
Confidentiality	Ensuring that information is accessible only to those authorised and is protected from unauthorised disclosure or intelligible interception.	Queensland Government Enterprise Architecture Glossary

Term	Definition	Source
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
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,	Queensland Government Enterprise Architecture Glossary

Term	Definition	Source
	thereby satisfying a recognised agency requirement.	
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 for persons, including persons qualified to interpret them; or c) anything from which sounds, images or writings can be reproduced with or without the aid of anything else; or d) a map, plan, drawing or photograph. 	<i>Public Records Act 2002</i> , Schedule 2, Dictionary.
Statewide	Queensland Health (statewide) significance or impact more than one HHS and/or Department of Health.	Data and application custodianship roles and responsibilities

9. Policy revision and approval history

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

10. 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	30 July 2019	New Queensland Health policy approved.
2.0	7 November 2022	Transferred to new template, content reviewed and inclusion of requirement 5.1.2. 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.
2.1	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.