1. **Statement**

The Department of Health (the Department) will assign roles and responsibilities to statewide 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 the Department’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**

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.
- Data and applications that are of a Queensland Health (statewide) significance or impact more than one Hospital and Health Service (HHS) and/or the Department of Health.

Out of scope of the standard is:
- Identification and appointment of HHS Data Custodians and Application Custodians.

The statewide Data Custodian is separate to that of 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 facility.²

HHSs may choose to adopt this standard either as is, by re-branding, or as a basis for the development of a HHS specific standard.

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.³

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² Queensland Health, 2019, Data and application custodianship roles and responsibilities, pg. 4.
³ Queensland Health, 2019, Data and application custodianship roles and responsibilities, pg. 3.
3. Requirements

3.1 Provide governance for data and application custodianship

3.1.1 Governance

• The Information Management Strategic Governance Committee (IMSGC)\(^4\) provides the decision-making framework for data and application custodianship. The IMSGC provides oversight and leadership to support information to be appropriately accessed, shared, used, managed, and stored. As part of the eHealth investment governance, the IMSGC has been established. The IMSGC is the governance committee for data and application custodianship, and shall:

  o Approve the appointment of Data Custodians and Application Custodians.
  o Provide a point of escalation for strategic matters relating to data and application custodianship.
  o Approve strategies, roadmaps, policies, standards and guidelines, and other materials relevant to data and application custodianship.

• Divisions and HHSs shall ensure:

  o Implementation of data and application custodianship governance.
  o Data and application custodianship responsibilities that are delegated shall be in alignment with the delegation framework approved by the Data Custodian or Application Custodian.
  o 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:

  o Escalate strategic matters relating to data and application custodianship to the IMSGC.
  o Undertake training through the data and application custodianship online Toolkit.

3.1.2 Policy framework

• Health Informatics Services (HIS), eHealth Queensland, shall ensure:

  o Policies, standards, guidelines and relevant documents relating to data and application custodianship are developed, maintained and regularly reviewed to ensure currency, relevance, consistency, and compliance with legislation.
  o Consultation is undertaken with relevant stakeholders in the development of data and application custodianship policies, standards, guidelines and associated documents.
  o Approved data and application custodianship documents are published and communicated to staff.

• Divisions and HHSs shall ensure:

  o 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 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 arrangements are in place, the data and application custodianship responsibilities shall be delegated.

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\(^4\) eHealth Queensland, 2018, Information Management Strategic Governance Committee Terms of Reference.
arrangement is in place, or if there are changes required to the existing approved arrangement, then the project/initiative is to obtain formal approval through the IMSGC (via HIS) 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.

- Upgrades to an application may not change the existing approved data and application custodianship arrangement.
- Where decisions need to be made for projects/initiatives that fall within the scope of a Data Custodian or Application Custodian responsibilities, the project/initiative shall identify and nominate for approval Data Custodian and Application Custodian roles.
- Prior to a project/initiative transitioning to business as usual, the roles of Data Custodian, Data Manager, Application Custodian, and Application Manager, shall be formally approved through the IMSGC.
- Divisions and HHSs are responsible for:
  - Identifying data and application custodianship roles, including Data Custodian, Data Manager, Application Custodian and Application Manager.
  - Implementing governance arrangements within their respective Division/HHS to support the identification and confirmation of nominations to be submitted and formally approved through the IMSGC.

### 3.2.2 Appointment
- 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 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 Data Custodians and Application Custodians approved by IMSGC.

### 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 leaves a position (temporarily or permanently)
  - a change in the designated role/position
  - an organisational realignment.
- Divisions and HHSs shall identify and seek advice from HIS in relation to changes to data and application custodianship and confirm with HIS whether these need to be approved through the IMSGC.
- Not all changes to data and application custodianship require IMSGC approval. For example, a change to the Data Custodians telephone number or a short term 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

- Divisions and HHSs 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 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 Divisions/HHSs shall contribute relevant material for inclusion in the toolkit.
- The development of education, training and support materials shall be ongoing and responsive to business needs.

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.
- Divisions and HHSs 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.
- Where a HHS maintains a local register of data and application custodians, the HHS 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 data and application custodianship roles, including Data Custodian, Data Manager, Application Custodian and Application Manager, is published on QHIK.
  - A list of Data and Application Custodians approved by the IMSGC is published on the Queensland Health Electronic Publishing System (QHEPS) as a supplementary summary document to QHIK.
4. Legislation

- *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 Service Act 2008 (Qld)*
- *Right to Information Act 2009 (Qld)*

Supporting documents

- *Data and application custodianship policy (QH-POL-458:2018)*
- *Corporate Records Management policy (QH-POL-467:2019)*
- *Retention and disposal of clinical records standard (QH-IMP-280-1:2014)*
- *Data Access Management*
- *Data and application custodianship roles and responsibilities*
- *Data and application custodianship roles and responsibilities - Summary Poster*
- *Data and application custodianship FAQs*
- *Data and application custodianship – Overview Fact Sheet*
- *Data and application custodianship – Further resources and supporting documents Fact Sheet*
- *Data and application custodianship: Toolkit*
- *Information Management Framework*
- *Information Management Framework – Summary Poster*
- *QGCIO Information Standard (IS44) Information asset custodianship policy*
- *QGCIO Records governance policy*

5. Definitions

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<tr>
<th>Term</th>
<th>Definition</th>
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<tr>
<td>Application</td>
<td>A software system deployed by the agency which has part of an agency’s business process embedded with it.</td>
<td>Data and application custodianship roles and responsibilities</td>
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<tr>
<td>Application Custodian</td>
<td>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.</td>
<td>Data and application custodianship roles and responsibilities</td>
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<td>Application Manager</td>
<td>A position designated with responsibility for the day-to-day management of an application including the planning, development, compliance, installation,</td>
<td>Data and application custodianship roles and responsibilities</td>
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<tr>
<td>Term</td>
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<td>configuration, maintenance and support of the application.</td>
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<td>Data and application custodianship roles and responsibilities</td>
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<td>Data</td>
<td>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.</td>
<td>Data and application custodianship roles and responsibilities</td>
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<tr>
<td>Data Custodian</td>
<td>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.</td>
<td>Data and application custodianship roles and responsibilities</td>
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<tr>
<td>Data Manager</td>
<td>A position designated with responsibility for the day to day capture, management, maintenance, operation, compliance, interpretation and supply of data.</td>
<td>Data and application custodianship roles and responsibilities</td>
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<td>Delegate</td>
<td>An appropriate individual (officer) with delegated authority to act autonomously and make decisions on behalf of a Data Custodian and/or Application Custodian.</td>
<td>Data and application custodianship roles and responsibilities</td>
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<tr>
<td>Fit-for-purpose</td>
<td>Data is accurate, valid, reliable, timely, relevant and complete.</td>
<td>Department of Health Data Quality Framework</td>
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<tr>
<td>Information</td>
<td>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.</td>
<td>Queensland Chief Government Information Office (QGCIO) Glossary</td>
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<tr>
<td>Information asset</td>
<td>An identifiable collection of data stored in any manner and recognised as having value for the purpose of enabling an agency to perform its function.</td>
<td>Queensland Chief Government Information Office (QGCIO) Glossary</td>
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<td>Term</td>
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<td>Record</td>
<td>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 -</td>
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<td></td>
<td>a) anything on which there is writing; or</td>
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<td>b) anything on which there are marks, figures, symbols or perforations having a meaning for persons, including persons qualified to interpret them; or</td>
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<td>c) anything from which sounds, images or writings can be reproduced with or without the aid of anything else; or</td>
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<td>d) a map, plan, drawing or photograph.</td>
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**Version Control**

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