

# Explainer: Establishing a Data Governance Framework

Establishing a data governance framework - whether a data trust, an open data framework or even an internal, closed data management system - involves common key steps. These steps permit better control over organizational data, which in turn enables better use of data and better compliance with privacy obligations. These steps generally include the following:

1. Obtaining organizational commitment,
2. Performing a data audit,
3. Establishing strategic and structural rules,
4. Piloting a project,
5. Establishing roles to implement the framework,
6. Resourcing the initiative, and
7. Rolling out the framework across the organization.

Data governance is a process, not an event, and many of these steps are iterative, repeated as the organization grows and its approach to data evolves.

## 1. Organizational Commitment

Data governance needs to come from the top: organizational leadership must buy-in to treating data as an asset that needs to be managed. Elements of organizational commitment include:

- Establishing a team - a data governance committee - to lay out the governance strategy,
- Involving every department that touches data, including the top management level, to produce “data evangelists”, and
- Embed privacy and security expertise and authority from the outset.

Key topics a data governance committee to consider include:

- Data management and access,
- Organizational strategy,
- Problem solving,
- Public engagement,
- Establishing a process for integrating new data into the organization, and
- Establishing policies for sharing and use of data.

## 2. The Data Audit

The first task of a data governance committee is to understand the object of the data governance exercise: what data does the organization manage, and what is its state? Key elements include:

- Assessing the data held throughout the organization,
- For each data set: Identifying obligations, liabilities and risks (privacy, intellectual property and contractual rights, etc.),
- Assessing data quality,
- Identifying existing data standards,
- Identifying gaps (what data, or fields of data, are not being collected that should be), meta-data requirements (data about data), and
- Identifying data-sharing practices and barriers.

### **3. Strategic and Structural Rules**

The primary task of a data governance committee is to identify the strategic objectives of the data governance framework and establish the structure required to achieve those objectives.

- Strategic assignment of “release strategy” for each data set: what is the form that data management should take to achieve organizational objectives? A “release strategy” dictates the manner in which the organization will share information internally and externally. Examples include:
  - a. Locked - data is not shared beyond the organization unit that manages the data
  - b. Shared internally - data is shared within the organization but not externally
  - c. Open data - data is shared to the maximum extent possible
  - d. Other (data trust, data co-op, etc.) - data is conditionally shared beyond the organization pursuant to a structured framework
- Adopt structural rules: How to treat data.
  - Identify and establish standards and rules applicable to data quality
  - Prepare processes :
    - dataset compliance with standards
    - changes to existing processes to improve data quality
  - Structure data - address disorganized data management practices with standards and data classification routines
  - Add meta-data - improve the ability to manage data by adding information about the data itself
  - Identify obligations that attach to the data: privacy, intellectual property and contractual rights
- Implement privacy and security compliance from the outset
  - Embed organizational privacy and security expertise in the exercise
  - Adopt useful privacy tools:
    - Privacy Impact Assessments

- De-Identification standards
      - E.g., Ontario De-identification Guidelines for Structured Data (Jun 08 2016)
  - Guidance: Provincial privacy commissioners provide guidance on various forms of data and information management to assist in meeting access and privacy obligations.

#### **4. Pilot a Project**

A pilot project allows an organization to test its chosen structure and the rules it has identified as necessary to achieve its objectives. A pilot program will demonstrate needed competencies and identify barriers to success. A successful pilot project can demonstrate how to implement privacy and security expertise throughout the governance exercise, and expose both shortcomings of the strategy and successes and lessons learned—all of which can inform the implementation of the data governance strategy across the organization.

#### **5. Roles**

A successful data governance framework places people who understand the framework's goals in positions that are adequately resourced to ensure their organization's adherence to the same. The roles necessary to successfully implement a data governance framework will follow from the structure the organization has adopted, and informed by the challenges and successes of the pilot project. Consider:

- What is each role's responsibility?
- What are their relationships? Who do they work with? Who do they report to?
- How does the organization distribute authority? Who makes the final changes to the services or program? Is this more top-down, or bottom-up?
- Does this organizational hierarchy fit the needs of the policies and processes previously identified?
- Have technical and non-technical needs both been considered? Leadership positions, financial planning, legal, et cetera?
- How will conflict resolution occur? (e.g. consensus? By vote? By top-down fiat?)

A key element of any data governance exercise is transparency and accountability: an organization must understand how decision-making occurs within its structure.

#### **6. Resources**

A data governance framework must be able to supply appropriate resources to the organization to administer the task. Having identified an organizational hierarchy and the roles needed to enact policies and procedures, are those roles adequately resourced? Do they have enough time to accommodate governance obligations? Have financial resources been allocated to

address rights and risk management, including privacy obligations? Are timelines and expectations realistic? Does the organization have required tools?

If an organizations finds that it lacks the resources required:

- Does each role have the ability to identify the resources they need?
- Is there a clear chain of authority to find the resources?
- Can the organization leverage internal support and expertise?
- Are there external resources that can be leveraged?

## **7. Roll-out**

The roll-out of a data governance exercise across an organization should be controlled, pursuant to the adopted framework of rules, engage the roles identified, be informed by the lessons learned in the pilot project, and be adequately resources to succeed. A data governance framework should also be adaptable and iterative, able to accommodate new challenges encountered, implement lessons learned, and develop expertise within the organization. And it must be replicable, able to address new data sources and initiatives.

Data governance is a process within an organization, not an isolated event or exercise. While the initial development of a data governance strategy and structure may have the feel of a project isolated in time, its deployment is operational in nature and will result in fundamental changes to the manner in which the organization functions. The end result will be greater efficiency in the delivery of services and better and more informed decision-making. It will also be improved recognition of privacy and other rights attaching to organizational data.