

Data ownership and custodianship procedure

This is a mandated procedure under the operational policy framework. Any edits to this procedure must follow the process outlined on the [creating, updating and deleting policy documents](#) page.

Overview

This document is aimed at informing all personnel of their responsibilities and obligations with respect to the ownership and custodianship of Department for Education data and information assets.

Scope

The document relates to access of data gathered, maintained and managed in the Department for Education on behalf of the Minister.

Data in this context refers to data held in electronic systems and files as well as any physical representations including reports, letters and emails.

This document applies to all Department for Education employees including contractors, consultants and



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Detail

Information governance

This procedure sets out how the department effectively governs data and information as a core strategic asset, as recommended by Principle 3 in the Principles on open sector public information published by the Office of the Australian Information Commissioner (OAIC).

Senior executives will be identified as responsible for ensuring the integrity and security of each of the department's information assets.

Staff

Domain: information about the department's staff. Examples include personal details (name, address etc.), qualifications, employment details etc.

Data custodian: Executive Director, System Performance

Data provider: Manager, Workforce Reporting

Finance

Domain: department financial data including payroll, accounts, grants etc. This domain includes both corporate and site financial information.

Data custodian: Executive Director, Chief Financial Officer

Data provider: Director, Budget and Finance

In all cases information within the domains may also include statistical analysis or reports derived from the raw data. Where such analysis or reporting data is produced within the department it has the same ownership and custodianship considerations as the source data.

This procedure is to be applied irrespective of the source of the data. Whether the data is sourced from a school administration system (i.e. EDSAS) or from an excel spreadsheet or a paper based form, the same governance applies.

Other agency data

South Australian Certificate of Education (SACE)

Domain: information about the participation, accreditation, assessment, recognition and certification of learning in the South Australian Certificate of Education (SACE).

Data custodian: Chief Executive, SACE Board of South Australia

Data provider: Director, Data Reporting and Analytics. Department held data on SACE activity and results for students.

The release of data from other agencies requires prior discussion with the Director, Data Reporting and Analytics.

Roles and responsibilities

Minister (data owner)

Has statutory 'ownership' and ultimate responsibility for the data, including the authority to grant access to data.

In accordance with the [Education and Children's Services Regulations 2020](#), subject to [the Act](#), these

regulations or any other Act or law, all school records and documents shall be deemed to be the property of the Minister, and the information contained therein confidential. The head teacher shall not permit any of them to be removed from the school without the sanction in writing of the data custodian.

Executive Director, System Performance (data custodian)

Is the person with the delegated authority from the Data Owner to approve provision, access and usage conditions of the data. The Data Custodian is a senior person at the Director Level.

Director (data provider)

Is the person or group with the day to day responsibility for the data management and the provision of the data as approved by the Data Custodian.

For all data within the Department for Education the owner is the Minister.

Supporting information

Related legislation

[Department of the Premier and Cabinet Circular PC012 – Information Privacy Principles Instruction](#)

[Office of the Australian Information Commissioner \(OAIC\) – Principals on open public sector information](#)

[Privacy Act 1988 \(Cth\)](#)

Related policies

[Data access and transfer procedure \(PDF 604KB\)](#)

[ICT cyber security standard \(PDF 488KB\)](#)

[South Australian Cyber Security Framework](#)

Record history

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Version: 1.2
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Version: 1.1
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