

Data management policies

Workplace Gender Equality Agency

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1. Introduction

1.1 Overview

This policy refers to all data collected by the Workplace Gender Equality Agency (Agency) under the *Workplace Gender Equality Act 2012* (the Act) that is not deemed to be personal information. It also includes data held in support of the production of the Agency's reports e.g. Australian Bureau of Statistics data. It excludes data relating to the Agency's administrative functions e.g. financial or human resource data.

The Agency may collect, hold, use or disclose personal information for a lawful purpose that is reasonably necessary for, or directly related to, one or more of its functions under the Act in pursuance of the objects of the Act. Personal information collected by the Agency is handled in accordance with the Agency's privacy policy.

Compliance with this policy is mandatory for all persons employed by, or associated with, the Agency who access data collected under the Act. This includes data in its original (submitted) form as well as data that have been transformed into reporting products.

2. Data governance policies

2.1 About this policy

Data governance is defined in the Agency's Data Governance Framework as 'the exercise of decision-making and authority for data-related matters'. Governance policies define how these decisions are made and communicated, and therefore how the authority is assigned. Governance implies leadership, delegation and evaluation. The Act defines the functions of the Agency and the governance arrangements established in this policy have been developed to support the successful delivery of these functions.

2.2 Authority for the Agency's work

The Act establishes the requirement for relevant employers to provide reports to the Agency and for the Agency to use these reports to perform a range of functions. These include:

- collection and analysis of information provided by relevant employers under the Act (s10.1.d)
- development of benchmarks in relation to gender equality indicators (s10.1.aa)
- undertaking research, educational programs and other programs for the purpose of promoting and improving gender equality in the workplace (s10.1.e)
- publishing of public reports by electronic or other means (s15.1.a).

The Act provides the Agency with the overall authority to acquire and manage data.

2.3 Approvals within the Agency

The committees and assigned roles defined in the Data Governance Framework constitute the structure of the data governance model. No significant data management authority is to be assumed, or decisions made, outside of this governance model unless specifically authorised in writing by the Director. The framework provides an escalation model for problems and issues.

2.4 Working with external stakeholders

The Agency will consult and work with our key external stakeholders. Where those other stakeholders are the providers of data (reporting organisations) we will ensure that we document, understand, consider and adopt appropriate governance arrangements for that data.

2.5 Responsibility for policies and procedures

The Data Governance Committee (Committee)() has the responsibility for addressing data gaps in the Agency's organisational policies, procedures and activities. The Committee will provide data management policy recommendations to the Agency's Executive Committee for their approval.

The Data Governance Committee will review the Agency's policies on an annual basis and will review the Data Governance Framework on a biennial basis.

2.6 The role of the data steward

The data steward is a role within the Agency, which manages the use and quality of the Agency's data holdings from an organisational perspective. The data steward is a subject matter expert with a base level of technical data literacy. The data steward is also responsible for ensuring that appropriate data management education, training and support is developed and delivered to staff.

All data holdings within our organisation will be assigned to the data steward. The data steward will have responsibility for justifying the acquisition, retention, processing and reporting of data through associating this use with defined organisational goals and outcomes.

The role of Agency data steward will be held by the Research and Analytics Executive Manager for all of the organisation's data holdings.

2.7 The role of the Data Governance Committee

The Data Governance Committee will develop and oversee the organisation-wide implementation of the Data Governance Framework. It will develop, coordinate and oversee organisation-wide standards for access, use and disclosure of data and gender equality indicators. The Data Governance Committee will also implement data management compliance systems and support, and initiate data management reviews and audits.

The Data Governance Committee will develop and oversee the data related activities (including data migration and data visualisation) during the development of the new data collection and data management system.

The Data Governance Committee is supported by the Executive Committee who collectively lead and have oversight responsibility for the day to day performance of the Agency. The Data Governance Committee is chaired by the Agency's data steward.

2.8 The role of data custodians

A data custodian is a role within the Agency which performs operational management of the collection, storage and use of one or more data holdings. Data custodians have high levels of data literacy as well as skills in data management software systems and tools.

Operational management of data holdings is delegated by the data steward to one or more data custodians. Data custodians are involved in the design of data acquisition, receipt and storage, processing, analysis, reporting, publication, dissemination and archival or deletion of data. Day-to-day processing and management of data is therefore under the control of appointed data custodians.

The role of Data Delivery and Insights Manager will be the data custodian for data collected under the Act. Other operational areas of the Agency will provide support to the data custodian across a range of areas including questionnaire development and provision of systems support.

The Data Delivery and Insights Manager will also be the data custodian for data obtained from external sources, such as Australian Bureau of Statistics data.

2.9 The role of data users

A data user will have access to specific data holdings to be able to analyse and report on the data. They will vary in their level of technical data literacy, subject matter knowledge and security clearance so it may be appropriate for them to be a 'read-only' user, where they can interrogate and use the data but do not have the authority to update (edit) or delete the data.

By being provided with access to data they are assuming responsibility for its correct use, analysis, interpretation, reporting and publication, and they must be supported in this role through effective IT systems, education and training.

Where a data user is unsure of their authority to access, analyse, report or disseminate data they should refer issues to the data custodian in the first instance.

2.10 Monitoring the implementation of data management policies

The Agency will monitor and report on the effectiveness of its data management policies. The Data Governance Committee will initiate and coordinate monitoring on an annual basis and report to the Agency's Executive team.

3. Data acquisition and storage

3.1 About this policy

The Agency's Data Governance Framework (Framework) identifies a range of ways in which data can be stored. This includes:

- structured formats such as databases
- semi-structured formats such as spreadsheets
- published formats including content on websites
- non-structured formats such as emails and documents.

The scope of the Framework incorporates the life-cycle management of all of these types of data as they relate to reporting against gender equality indicators.

The life-cycle of a data holding begins with the planning for its acquisition and storage. Once data is physically available it needs to be received, stored and managed through the remainder of its life cycle. This requires that staff have access to relevant data management tools and have a clear understanding of where data should be stored, what metadata needs to be stored alongside it, what naming conventions to apply, what security to apply and how to apply it.

The scope of this policy covers the spectrum of data types i.e. reporting data acquired through the Agency's Data Portal and stored on the Agency's secure server, analysis data holdings accessed through Cognos and SPSS, web-hosted data and documents, emails and electronic documents stored on servers. Subject to having appropriate access, a user should be able to easily reference all data and metadata associated with a task or subject, regardless of the type of data storage e.g. relevant emails related to its acquisition, documents recording its metadata, the data holding itself, reports and other outputs, and web-published material.

3.2 WGEA Protective Security Policy

The Agency's protective security policy applies is an internal policy that applies to all Agency staff. It establishes effective protective security measures that ensure the safeguarding of government resources and information. It covers:

- security risk management
- personnel security
- physical security
- information security

The Protective Security Policy provides the baseline for effective information management within the Agency and forms part of the Australian Government Protective Security Policy Framework (PSPF). It contains information security guidelines as they relate to the safeguarding of government information.

In accordance with the PSPF, the Agency has incorporated security into its broader Agency risk management framework.

3.3 Prioritisation of data access

The Agency prioritises the management of its data holdings so that certain data holdings are afforded greater scrutiny and control than others, based on the risk of inappropriately identifying an individual or organisation. Broadly, the prioritisation from highest to lowest is:

- data collected under the Act that relates to remuneration of an individual or for an organisation
- non-remuneration data collected under the Act that is not publically available (e.g. data that is under embargo)
- data that is publically available (e.g. via the Agency's Data Explorer or from an organisation's public report)

- data acquired by the Agency from a publically available source (e.g. data from the Australian Bureau of Statistics)

The Agency will provide data access to staff based the requirements of their role. Access to sensitive data will be managed through access controls for secure drives and data extraction tools.

The Agency's data steward, data custodian and data users with access to the Agency's data warehouse will be required to obtain a baseline security clearance.

3.4 Development of inter-connected data management systems

The Agency will work to develop and implement interconnected systems and architectures to ensure that the life cycle of a data holding will be managed so that reported data will be traceable back to its source(s) and its life cycle will be discoverable. This may, where appropriate and technically feasible, include data stored on systems external to the Agency.

3.5 Use of corporate data solutions

The Agency will pursue, encourage and support the development of corporate systems and architectures which support our data management principles, and discourage solutions which support individual preferences to the detriment of the life-cycle model.

The Agency will educate and support staff through training and IT systems to make it as easy as possible for them to appropriately store data in the required locations and formats.

3.6 Data Governance Committee responsible for procedures

The Data Governance Committee is responsible for developing guidelines, procedures and training for how and where data holdings are to be stored, including naming conventions.

3.7 Promotion of the existence of data holdings

Knowledge of the existence of data holdings will be made available to all staff, although access to the data itself will often be restricted.

3.8 Documentation of business processes

The Agency will document the internal processes used to acquire, store and manage data. This documentation will be made available to all staff and relevant stakeholders who will be invited to comment on and contribute to the development of these processes. Through these efforts the Agency will provide leadership in the field, but will also work towards nationally consistent approaches to data management.

3.9 Deletion of unwanted data holdings

Data holdings that are no longer required may only be deleted from storage by a data custodian with authority from the Agency's data steward. The metadata which records the nature of this data, plus the metadata which records the life-cycle of the data within the Agency, must not be destroyed but must be retained for future reference.

Deletion of any Agency record will be done in compliance with the Agency's Records Disposal Authority and National Australian Archives guidelines.

4. Data quality

4.1 About this policy

Data quality refers to the characteristics of data holdings across a range of dimensions. These are:

- **Accessibility** - the capacity of users to identify the availability of relevant information, and then to access it in a convenient and suitable manner.
- **Accuracy** - the degree to which the data correctly describes the phenomena being measured. This is an important component of quality as it relates to how well the data portray reality, which has clear implications for how useful and meaningful the data will be for interpretation or further analysis. Accuracy should be assessed in terms of the major sources of errors that potentially cause inaccuracy. Any factors which could impact on the overall validity of the information for users should be described in quality statements.
- **Coherence** - the internal consistency of a data holding, as well as its comparability with other sources of information, within a broad analytical framework and over time. The use of standard concepts, classifications and target populations promotes coherence, as does the use of common methods across collections and reference periods. It is important to note that coherence does not necessarily imply full numerical consistency, rather consistency in methods and collection standards.
- **Interpretability** - the availability of information to help provide insight into the data. This may include information about the variables used, the availability of metadata, including concepts and classifications. Interpretability is an important component of quality as it enables the information to be understood and utilised appropriately. Information on interpretability would point users towards other documentation to help understand the data and also identify any key variables which are difficult to interpret.
- **Relevance** - the degree to which information meets the needs of users, and how well the data meets the agreed purpose of the data collection in terms of concepts measured and the cohort represented. Enough information needs to be provided to enable each user to make an assessment of whether the data collection addresses the issues most important to them. It is under the 'relevance' dimension that key information would be given about the broad definitional and coverage aspects of the data.
- **Timeliness** - the delay to which the information correctly describes the phenomena being measured. Aspects of timeliness which should be addressed include the reference period (to which the data pertain), the frequency with which data are provided, the frequency of publication of data, the agreed date for provision of initial data, the actual date at which all necessary data first became available, the intended first release of a publication/report, the actual first release of data from the collection.
- **Institutional environment** - the institutional and organisational factors which may have a significant influence on the effectiveness and credibility of the agency producing the statistics. Consideration of the institutional environment associated with a statistical product is important as it enables an assessment of the surrounding context, which may influence the validity, reliability or appropriateness of the product.

This data quality model is based on the ABS Data Quality Framework which provides standards for assessing and reporting on the quality of statistical information. The ABS Data Quality Framework is itself based on the Statistics Canada Quality Assurance Framework and the European Statistics Code of Practice. The Agency will take a proactive approach to managing data quality and will identify data quality requirements in the planning phase for data acquisition and then monitor through the lifecycle of the data holding.

4.2 Use of data quality statements

The Agency will assess and record the quality of its data holdings. Indicators relating to the quality of the Agency's data holdings will be incorporated into data quality statements as a standard part of data management.

4.3 Data quality model

Data quality statements will accompany the Agency's data holdings and will be recorded in the Agency's publicly available website. These statements will be based on the ABS Data Quality Framework.

4.4 Responsibility for data quality

The Agency's Research and Analytics team will manage the day-to-day data quality activities associated with collecting data from reporting organisations. This function will be supported by the Advice and Reporting team, who have primary responsibility for liaising with reporting organisations, and the Operations team, who manage the ICT systems required for data quality activities.

The Agency will ensure that it communicates any data quality issues that are likely to affect the interpretation of the data that it uses in its publications. This includes data directly collected by the Agency as well as data accessed from external sources.

4.5 Data cleaning activities

The Agency's Research and Analytics team will systematically review data submitted by reporting organisations and inform them of any data quality issues arising from their report submission as soon as is practicable.

Reporting organisations will have a minimum period of 28 days from the submission of their compliance report to review their submitted data and make any necessary amendments.

4.6 Changes to reporting data

Data provided to the Agency by reporting organisations will only be changed (edited) by a contact for that reporting organisation via the Agency's Data Portal. The Agency will advise report contacts on the appropriate interpretation of their reporting requirements, however the provision of correct data for an organisation is the responsibility of that organisation.

There may be rare instances where Agency staff are required to change/ edit reporting data on behalf of an organisation. In these instances, changes may only be made under specific direction of a representative of that organisation. It is the responsibility of the reporting contact to ensure that the provided data is appropriately signed-off from within their organisation and that any change made is an accurate reflection of that organisation's practices. The Agency will maintain accurate audit trails within its data systems.

4.7 Commitment to improvement

The Agency is committed to improving the quality of the data it collects. The Agency will review its reporting questionnaire and the data it collects regularly to ensure that reporting organisations are providing high quality information.

Changes to the Agency's reporting questionnaire will not be made without consultation with reporting organisations.

5. Data processing and analysis

5.1 About this policy

Data processing refers to the normal activities that occur to transform data into information. This may include cleaning the data (checking for and resolving errors and inconsistencies), expanding the data (perhaps using existing known reference data to aggregate fields), merging the data with existing holdings (e.g. to create a coherent data collection), and analysing the data using various statistical and programming techniques. The important principle is that all steps and stages, all transformations on the data, must be recorded as metadata for later retrieval and reference.

5.2 Recording the user(s)

All data processing must be recorded with a user identity i.e. the identity of the person who performs the actions must be recorded alongside the actions with a date and time stamp.

5.3 Responsibility for recording processing metadata

The Agency will use IT software and systems to automatically record the metadata for data transformations wherever possible. For example, the Agency's customer relationship management system captures and records all actions taken during data processing. For internal processing and analysis tasks, it is ultimately the responsibility of each user who transforms the data to ensure that adequate and appropriate metadata is recorded.

For external processing tasks (e.g. data submission), users are required to log in via MyGovID. This process ensures that the activities of external data submitters are appropriately logged in the Agency's systems.

5.4 Use of standard analysis methods

The Agency will document and promote the use of standard methods for processing and analysing data, using corporate systems.

Where the Agency uses statistical methods to analyse data for external publication, these methods will be clearly documented in a way that would enable an independent party to replicate the analysis from the same data source. Wherever practicable, analysis conducted by Agency staff will be independently cross-checked by another staff member to ensure the analysis' validity.

6. Data reporting, sharing and dissemination

6.1 About this policy

Data reporting, sharing and dissemination refers to all activities by which the data made available outside of our organisation e.g. direct provision of data, publication of reports, media releases etc. These actions require authorisation by a delegate within the organisation.

This information collected by the Agency forms a detailed dataset that paints a comprehensive picture of gender equality across reporting organisations. This data set is public sector information, that is, data, information or content that is generated, collected, or funded by or for the government or public institutions.

Australian Government policy is that public sector information is a national resource and releasing as much of it on as permissive terms as possible will maximise its economic and social value to Australia and reinforce its contribution to a healthy democracy.

The Government has outlined eight *Principles on open public sector information*. These principles are nonbinding on government agencies, however the Agency recognises the importance of making its data publicly available and is committed to making its data as accessible and usable as possible, subject to the relevant legislation and Agency policies outlined below.

6.2 Release of public reports

The Act (section 15) allows for the publication of information provided to the Agency as part of an organisation's public report, by electronic or other means. The Agency will make this information publically available in the year that the data is collected. These reports will be published to the Agency's website, excluding any remuneration information.

6.3 Personal information released in accordance with privacy policy

Personal information will be handled by the Agency in accordance with the Agency's Privacy Policy. The Privacy policy covers:

- names, telephone numbers, email addresses, position and organisation contact details of the reporting contacts and Chief Executive Officers (or equivalent) of employers that are required by the Act to report to WGEA (relevant employers); and
- names, telephone numbers, email addresses, position and organisation contact details of stakeholders of WGEA, including contacts at industry associations, not-for-profit organisations, partners, newsletter subscribers and media contacts; and
- information about our employees and contractors in relation to personnel and payroll activities, recruitment and other matters such as work, health and safety; and
- information from prospective employees provided in their application for employment.

6.4 Agency use of remuneration data

The Act (section 14) makes specific reference to the use of remuneration data. Information provided to the Agency regarding remuneration paid by a reporting organisation to its employees will only be published if:

- the Agency receives written notice from the organisation agreeing to the information being published
OR
- the information is presented in aggregate form that does not disclose, either directly or indirectly, information about a specific relevant employer or another specific person

In preparing aggregated remuneration data, the Agency will apply suppression rules to protect against the identification of specific organisations and individuals.

Final suppression rules will be determined on a case-by-case basis to ensure that organisations and individuals cannot be re-identified either within a data holding or through combining multiple data holdings.

6.5 Use of data for Agency reporting

The Agency produces a range of data related reports including factsheets, insight papers and media releases. The Agency will aim to produce data outputs once, for multiple reuses within the Agency, to feed into these products.

6.6 WGEA Data Explorer and [data.gov](#)

The Agency will make aggregated datasets available via its [Data Explorer](#) and through [data.gov.au](#). These data sets will be accompanied by relevant metadata and explanatory information.

6.7 Release of the public data file

The Agency will prepare a public data file which summarises the organisation level data that is available in public reports. Access to the public data file can be requested from the Agency by completing a [WGEA Data Request Form](#). Each request will be assessed by the Agency to ensure that:

- granting the request will not breach any privacy or confidentiality restrictions on the data
- each output aligns with the Agency's core purpose
- each output will add to awareness, understanding and knowledge on gender equality in Australian workplaces
- each output methodology is valid
- each output will be conducted ethically
- the requested data will be used only for the agreed output
- each output will accurately represent the data and the Agency's reporting regime.

Release of the public data file is subject to the approval of the relevant data custodian.

6.8 Custom data requests

The Agency will accept requests for custom data requests. These requests will be assessed against the same criteria as listed in item 2.6, as well as the complexity of the request and consideration of the Agency's internal capacity.

Dissemination of custom data request outputs is subject to the approval of the relevant data custodian.

6.9 Creative commons

The default licensing condition for the Agency's data is Creative Commons BY standard, as recommended in the Intellectual Property Principles for Australian Government Agencies.

6.10 Freedom of information

The Agency is subject to the Freedom of Information (FOI) Act that provides every person with a legally enforceable right to obtain a document of an agency, other than an exempt document.

Any request by a third party to access remuneration information (other than at an aggregated level which does not identify an individual or employer) will be refused under s 45 of the FOI Act. This section relates to documents containing material obtained in confidence in circumstances where certain criteria are satisfied.

7. Metadata management

7.1 About this policy

Metadata is defined as data about data. This policy covers two types of metadata:

Business metadata –this relates the Agency’s definitions to the metadata user. It can include the business names and definitions of subject and concept areas, entities, and attributes; attribute types and other attribute properties; range descriptions; calculations; algorithms and business rules; and valid domain values and their definitions.

Technical and operational metadata - this provides users with information about their systems. Technical metadata includes database table and column names, data element properties, other data object properties, and data storage. Operational metadata is targeted at IT operations users’ needs, including information about data movement, source and target systems, storage and processing, recover and backup information, archive rules, and usage.

7.2 Recognising the importance of metadata

The Agency recognises the importance of metadata to its operations, and will give a high priority to supporting high quality metadata.

7.3 Recording of metadata

The Agency will document its metadata requirements, will build metadata recording into our IT systems and software to the fullest extent possible, and will train and support our staff in their recording of metadata.

Business metadata will be made publically available in an appropriate metadata repository using a recognised international standard (i.e. ISO/IEC 11179).

7.4 Recording metadata within IT systems

Agency systems will be set-up to capture technical and operational metadata as a standard part of data processing. Contractual arrangements with external IT providers will specify the requirement for appropriate documentation relating to data definitions, data models and technical specifications.

8. Staff education, support and training

8.1 About this policy

This policy covers staff education, support and training as it relates to data governance and management within the Agency.

This Data Governance Framework and associated policies provide a structure for the development, promotion and implementation of good data management practices. The Agency's commitment is to having well-defined, best practice data management policies and procedures supported by staff training and support systems that make effective data management part of its day-to-day work practices.

8.2 Role definitions and support

The Agency will maintain role definitions and education and training material for each of the data roles. We will provide training and support for these roles through induction, refresher and on-going training.

8.3 Best practice

The Agency will support and work with data management communities of best practice across government and the private sector so that user expertise is able to be shared.

8.4 Support for data users

The Agency will provide data management support for its data users. The support service will include formal documentation, policies and procedures, planning and advisory services (e.g. the best formats and locations for data, the use of reference data, the best analytical and reporting tools for a job, metadata recording requirements), as well as real-time support services e.g. problems or issues with current tasks.

8.5 Responsibility for ensuring adequate training and skills

The data steward is responsible for ensuring that data users accessing the Agency's data have had appropriate training and have the necessary skills and knowledge to access and use that data.

Delivery of training may be led by the data steward, data custodian or other individual, either from within the Agency or from outside of the Agency.

9. Glossary

Term	Definition
Data custodian	A data custodian is a role within the Agency which performs operational management of the collection, storage and use of one or more data holdings. Data custodians have high levels of data literacy as well as skills in data management software systems and tools.
Data governance	A system of decision rights and accountabilities for information-related processes, executed according to agreed-upon models which describe who can take what actions, with what information and when, under what circumstances, using what methods ¹ .
Data holding	A cohesive set of data, designed to address specific governance needs, which may be created externally and provided to the Agency or generated internally, either by direct collection or modification of existing data.
Data management	The development, execution and supervision of plans, policies, programs and practices that Data management control, protect, deliver and enhance the value of data and information assets ² .
Data Governance Committee	The Data Governance Committee reports to the Executive Committee on matters relating to data management. They have responsibility for the development and implementation of data management policies and procedures.
Data steward	A data steward is a role within the Agency which manages the use and quality of the Agency's data holdings from an organisational perspective. A data steward is a subject matter expert with a base level of technical data literacy.
Data user	Data users are those staff within the Agency who needs access to the data for analysis and producing Agency reports, but who are not custodians or stewards of the data. Data users will have varying levels of data literacy and data management skills.
IT and systems support	IT and systems support refers to a range of experts which provide specialist hardware, software and systems advice

¹ The Data Governance Institute http://www.datagovernance.com/adg_data_governance_definition/ accessed 09/02/2017

² The DAMA Guide to the Data Management Body of Knowledge (DAMA-DMBOK), 1st Edition 2009, p.4

10. References and related documents

WGEA Data Governance Framework <https://www.wgea.gov.au/sites/default/files/data-governance-framework.pdf> *Workplace Gender Equality Act 2012* <https://www.wgea.gov.au/about-legislation/workplace-gender-equality-act-2012> WGEA privacy policy <https://www.wgea.gov.au/privacy-policy#Introduction>

Australian Bureau of Statistics data quality framework

<http://www.abs.gov.au/websitedbs/D3310114.nsf/home/Quality:+The+ABS+Data+Quality+Framework>

Office of the Australian Information Commissioner *Principles on open public sector data*

<https://www.oaic.gov.au/information-policy/information-policy-resources/principles-on-open-public-sector-information>