

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 researchers and employment agency staff, and school and preschool communities.



Government
of South Australia

Department for Education

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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 the department’s information assets.

These executives will ensure maximum benefits to students, schools and the South Australian community through availability of the department’s data and information while mitigating the misuse of data and associated harm to individuals or the department.

This procedure operates in conjunction with related legal agreements and procedures that ensure a rigorous process for assessing requests for access to data and releasing data outside of the department.

School records and documents

All school records and documents are the property of the Minister. The information contained in them is confidential. This is in line with the [Education and Children’s Services Regulations 2020 \(SA\)](#), the Education and Children’s Services Act 2019 and other relevant legislation.

The Principal of a Government school, or the director of a stand-alone preschool or children's services centre established after the commencement of this regulation, must not permit the removal of prescribed Government records and documents from the school, preschool or children's services centre unless authorised to do so by the Chief Executive.

Department data

Student or child

Domain: all data related to a child or student. This can include information such as demographics, achievement, attendance, contacts etc.

Data custodian: Executive Director, System Performance

Data provider: Director, Data Insights

Site

Domain: information about the department’s sites such as schools, child care centres and regional offices. This can include information about site location, contacts, demographics, services offered and more.

Data custodian: Executive Director, System Performance

Data provider: Director, Data Insights

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 Insights. Department held data on SACE activity and results for public education students.

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

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 \(SA\)](#), subject to [the Act \(SA\)](#), 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 Principal shall not permit any of them to be removed from the school without authorisation.

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 \(PDF 536KB\)](#)

[ICT cyber security standard \(PDF 1.2KB\)](#)

[South Australian Cyber Security Framework](#)

Record history

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Approvals

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Policy officer: Senior Research & Project Advisor

Policy sponsor: Director, Strategic Data Initiatives

Responsible Executive Director: Executive Director, System Performance

Approved by: Director, Strategic Data Initiatives

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Revision record

Version 1.6

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Amendment(s): Updated Directorate names and wording for clarity.

Version: 1.5

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Version: 1.4

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Version: 1.3

Approved by: Director, Data, Reporting and Analytics

Approved date: 1 February 2019

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Amendment(s): Minor Edits: Changes to reflect organisational and departmental changes. Updated to reflect new format.

Version: 1.2

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Amendment(s): Minor Edits: Annual review and revision. Changes to realign the Domain items to reflect the organisational structure as a result of the formation of Department of Child Protection.

Version: 1.1

Approved date: 1 September 2015

Amendment(s): Minor Edits: Annual review and revision. Change from protocol to procedure and to reflect to the new organisational structure.

Version: 1.0

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Approved version: Changes as per the Information Data and ICT Governance Board Meeting, Inclusion of Families SA Data Domains.

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