# phn COOPERATIVE

## An Australian Government Initiative

# Primary Health Network National Data Governance Policy

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Primary Health Network National Data Governance Policy

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# 1   Introduction

## 1.1   Purpose

The *Primary Health Networks Data Governance Policy* (the Policy) describes the process used by Primary Health Networks (PHNs) to successfully manage the privacy and security of all data they receive, generate, provide and report upon. This policy is supported by a comprehensive Data Governance Framework, which all Primary Health Networks are governed.

## 1.2 Scope

This policy applies to all members of the PHN Cooperative, i.e. Primary Health Networks throughout Australia. It provides transparency, accountability and uniformity across all PHNs. Complementary individual PHN data governance policies contextualise and enhance this national policy at the jurisdictional and local level.

All data are required to be collected, managed, secured, shared and protected in accordance with the requirements of this policy, together with any requirements associated with:

- Commonwealth and State legislation;

- certain regulations;

- health industry standards with respect to how they collect, manage, secure, share and protect this data.

The protection of data is balanced with the safe and efficient sharing of data to ensure its full value is realised.

The PHN Cooperative's National Data Governance Committee has developed this policy, aligned with the PHN Cooperative's National Data Governance Framework.

## 1.3 Audience

The intended audience for this document includes healthcare providers, community members and other stakeholders.

## 1.4 Definitions

| | |
|---|---|
| Data Governance Framework | Identifies and provides an overview of the Primary Health Networks data governance, structures and support mechanisms in place to ensure security, privacy and effective and consistent management of the data associated with Primary Health Networks. |
| De-identified Data | The de-identification of data involves two components. The first is the removal of direct identifiers. The second is taking one or both of the following additional steps:<br>1. The removal or alteration of other information that could potentially be used to re-identify an individual, and/or<br>2. The use of controls and safeguards in the data access environment to prevent re-identification. |
| Health Care Provider | Includes General Practices, Non-Government Organisations, Local Health Districts, Aboriginal Medical Services, Aboriginal Community Controlled Health Organisations. |
| PHN | Primary Health Networks (PHNs). On 1 July 2015, 31 PHNs were established to increase the efficiency and effectiveness of medical services for patients, particularly those at risk of poor health outcomes, and to improve coordination of care to ensure patients receive the right care in the right place at the right time. |
| PHN Co-operative | The PHN Cooperative is a collective function of which all 31 PHNs in Australia are members. The PHN Cooperative serves as a single point of contact for the PHN Network and facilitates activities and engagement beyond what individual PHNs can do at a local level. |
| PHN Cooperative National Data Governance Committee | The PHN Cooperative's peak forum regarding Data Governance, responsible for publishing the Data Governance Framework. |
| Primary Health Insights (PHI) | Primary Health Insights (PHI) is a shared data platform for PHNs. It brings together data governance, advanced analytics, an industry leading secure data platform and primary health informatics experts across the PHNs to improve population health outcomes for all Australians. |

## 1.5 The Primary Health Network Program

PHNs are a national network of independent primary health care organisations with the key objectives of:

- increasing the efficiency and effectiveness of medical services for patients, particularly those at risk of poor health outcomes; and

- improving coordination of care to ensure patients receive the right care in the right place at the right time.

The PHN Program builds on a history of regionally-based primary health care organisations in Australia. 31 PHNs were established on 1 July 2015, to create opportunities to strengthen, and improve the integration of the primary care system with consideration of regional needs. The Australian Government has determined seven key priority areas for targeted work for PHNs. These are mental health, Aboriginal and Torres Strait Islander health, population health, health workforce, digital health, aged care, and alcohol and other drugs.

PHNs are commissioning frontline services for core priorities identified in their region. As commissioners, PHNs have autonomy and flexibility to decide which services or healthcare interventions should be provided within their regions, who should provide them and how they should be paid for. However, achieving value for money is a core requirement of commissioning processes conducted by PHNs, and decisions should be made in an accountable and transparent manner. While the department provides support and guidance to PHNs, it is integral to the success of the PHN Program that PHNs make these decisions independently of Government.

Support for general practice is a fundamental role for PHNs, in recognition of general practice as the cornerstone of primary health care. In addition, the alignment of PHN boundaries with Local Hospital Networks (LHNs) where possible, allows PHNs to work with LHNs, providers and communities to design integrated services and coordinate care in a patient-centred model.

The Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cwlth), as well as the applicable state-based privacy legislations outline how PHNs must handle, use and manage personal information. PHNs are required to operate in accordance with their obligations under the Act.

Further information about the PHN Program is available on the PHN website.

## 1.6 Primary Care Data

General practitioners collect patient clinical data as a core component of providing care to patients. This is currently collected using commercial Practice Management Systems / Software (PMS). When extracted in a de-identified form from a PMS, using data extraction and analytics tools, it provides the richest source of health intelligence nationally. With the consent of healthcare providers and patients, PHNs and other parties use data extraction and health analytic tools to access, analyse and report on this data to support General Practice improvement of patient care through:

- meeting obligations under the Australian Government Department of Health's Quality Improvement (QI) Incentive under the Practice Incentives Program (PIP);
- improving safety and quality by integrating diagnosis, medications and pathology data from practice management system and applying evidenced based algorithms to reduce preventable hospital admissions from medication errors;
- risk stratifying the population to identify high risk groups of patients requiring proactive intervention to improve their health and wellbeing;

- identifying with hospitals patients at high risk of hospital admissions, enabling better integrated care to avoid hospital admission;
- providing clinical audit functions, enabling better care planning and preventative care;
- Undertaking quality improvement and providing easier compliance with Practice Incentive Payment guidelines and targets;
- improving GP workflow by integrating with booking systems and recall functions to deliver more practice care;
- providing a service navigation function linking patient diagnosis to appropriate services;
- providing government and health planners with real time information to inform investment decisions.

PHNs and other parties also use data extraction and analytic tools to:

- enhance the level and detail of service planning that PHNs can do based on historic and current de-identified patient level, practice level, and regional level data, enabling predictive modelling, and tracking outcomes over time; and,
- undertake evaluations of programs.

## 1.7 Data Governance Stakeholders

Data governance activities of Primary Health Networks require a collaboration between many stakeholders, who are required to understand their role in the data lifecycle. The diagram below provides a brief profile of the role those stakeholders play in ensuring effective data governance.

| Patients | Health Care Providers | Software Vendors | Primary Health Networks (PHNs) | Primary Health Insights | Recipients |
|---|---|---|---|---|---|

Primary Health Networks (PHNs) – Core business functions and primary health care facilitators

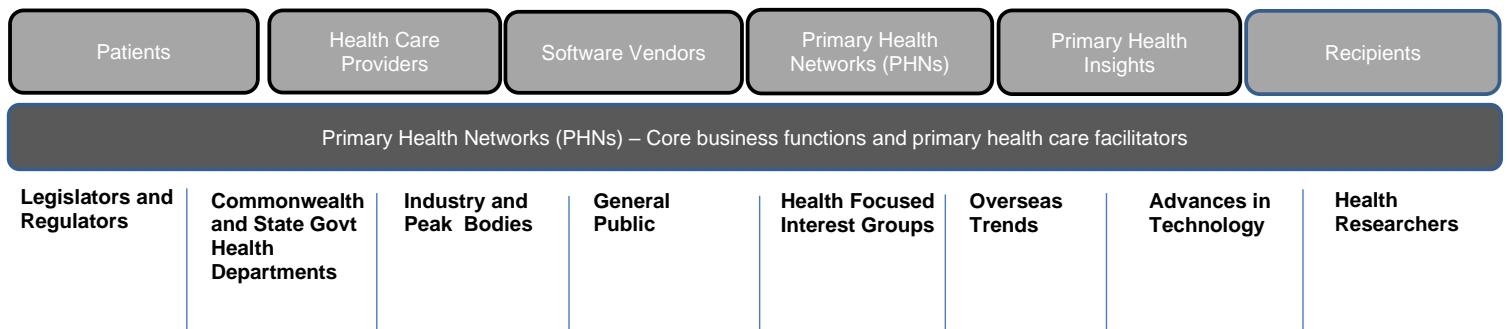| Legislators and Regulators | Commonwealth and State Govt Health Departments | Industry and Peak Bodies | General Public | Health Focused Interest Groups | Overseas Trends | Advances in Technology | Health Researchers |
|---|---|---|---|---|---|---|---|

Figure 1 Data Governance Stakeholders

# 1.8 Data Governance Concepts

While definitions regarding data governance vary, they incorporate an approach that is "*informed by, and designed to ensure compliance with legal, regulatory and governance environments*". This needs to be done *"whilst achieving its purpose to create authoritative and accessible information and statistics that inform decisions and improve the health and welfare of all Australians*". Data governance is 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 data, and when, under what circumstances, using what methods.*" *(Australian Institute of Health and Welfare, 2019)*

Some organisations draw a distinction between the concepts of data governance, data management and IT governance with the following view of each:

- **Data governance** designates the source of authority for making decisions about data; the roles/structures authorised to make decisions; and the basis upon which decisions are made.
- **Data management** is the planning, execution and oversight of policies and processes that acquire, store, protect, and deliver data and information assets.
- **Information Technology governance** describes processes that ensure the effective and efficient use of Information Technology in enabling an organisation to achieve its goals.

Key principles guiding our data governance are outlined below:



> **Assurance:** Protection of the privacy of individuals and providers in Primary Health Networks
>
> **Accountability:** Controlled management and use of data through legislative and policy obligations
>
> **Harnessing the power of data:** Preparing and making high quality, insightful data available to improve patient outcomes.
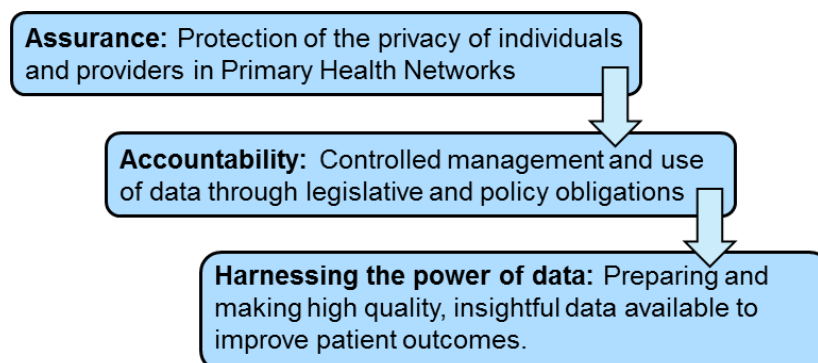
**Figure 1 Key overarching principles for data governance**

Effective and efficient data governance ensures that data is managed, used and protected in line with legal and community expectations. This provides benefits including:

- clarity on data governance structure including roles, responsibilities and accountabilities;
- clear articulation of data governance policies, processes and procedures;
- assurance of appropriate levels of data security and privacy;
- appropriate access to data; and,
- efficiency of data management.

# 2 Primary Health Network Data Governance Model

## 2.1 Data Governance Framework

The Primary Health Network Cooperative has adopted a Data Governance Framework outlining data governance, structures and support mechanisms in place to ensure security, privacy and effective and consistent management of the data associated with the Primary Health Networks. It includes:
- guiding principles;
- the legal, regulatory and governance environment in which Primary Health Networks operate;
- organisation structures, roles and responsibilities;
- enabling effective data governance;
- policies, processes and procedures to drive data governance;
- tools and technology supporting data management and data governance; and,
- governance controls - compliance regimes.

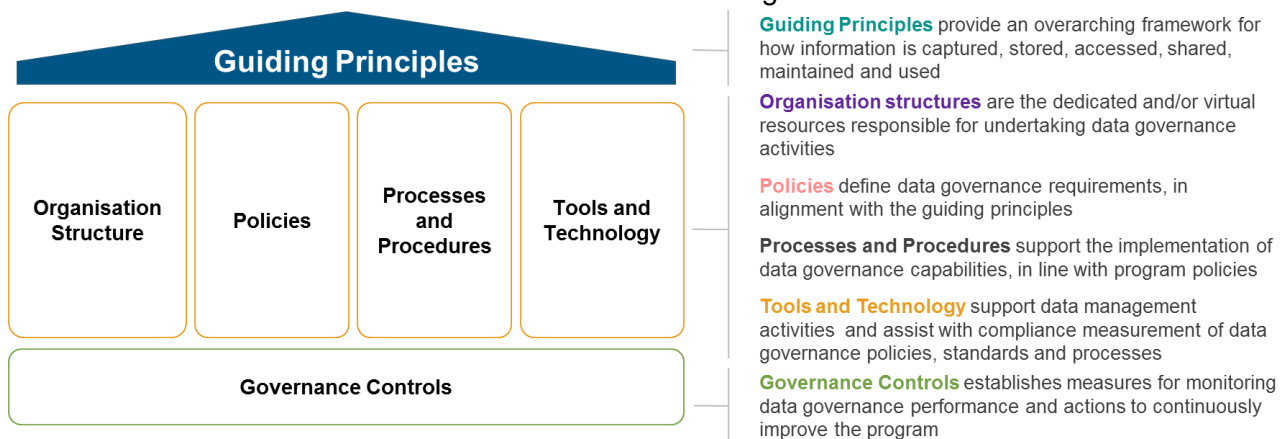The Data Governance Framework is shown below in a diagram:



**Guiding Principles** provide an overarching framework for how information is captured, stored, accessed, shared, maintained and used

**Organisation structures** are the dedicated and/or virtual resources responsible for undertaking data governance activities

**Policies** define data governance requirements, in alignment with the guiding principles

**Processes and Procedures** support the implementation of data governance capabilities, in line with program policies

**Tools and Technology** support data management activities and assist with compliance measurement of data governance policies, standards and processes

**Governance Controls** establishes measures for monitoring data governance performance and actions to continuously improve the program

**Figure 2 Diagrammatical view of the Data Governance Framework**

## 2.2 Overview of the Data Governance Framework

The Primary Health Networks Data Governance Framework provides a minimum set of data governance practices associated with the acquisition, storage, management, analysis, sharing and protection of primary health care data. The framework guides Primary Health Networks (PHNs) in their role as data custodians, in order to successfully manage the privacy and security of all data they receive, generate, provide and report upon. This is particularly applicable when PHNs agree to share data to a shared data platform such as the Primary Health Insights Platform.

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The Data Governance Framework:

1. Outlines the guiding principles that are applied to data governance of primary health care data that support processes to ensure consistency and minimum standards for PHN data governance.
2. Outlines the organisation structure and associated roles and responsibilities involved in data governance.
3. Specifies the policies, processes and procedures that PHNs and shared data platforms have in place to support effective data governance.
4. Describes the tools and technologies that can assist PHNs with their data governance responsibilities.
5. Outlines the governance controls that enable the measuring and monitoring of data governance practices.

The Framework leverages the Australian Privacy Principles and several existing Australian health-sector data governance and data protection frameworks and guidance documents, including:

- Australian Institute of Health and Welfare - Data Governance Framework;
- Australian Institute of Health and Welfare - National Primary Health Care Data Asset
- NSW Ministry of Health - Health Data Governance Framework;
- Office of the Australian Information Commissioner - Australian Privacy Principles Guidelines
- Australian Government Department of Health. PIP Eligible Data Set Data Governance Framework;
- Australian Digital Health Agency - Digital Health Cyber Security Centre;
- Royal Australian College of General Practitioners – Running a practice – Everything you need to know about running a secure practice;
- Australian Signals Directorate – Australian Government Information Security Manual.

## 2.3 Guiding Principles

The Data Governance Framework is focused on these guiding principles:

- Primary Health Care data is a national strategic asset;
- the principles of Indigenous Data Sovereignty are acknowledged and embedded in the management and governance of primary health care data;
- Primary Health Networks are the regional data custodians of primary and community care data;
- primary health care data must have clear stewardship;
- patient privacy must be maximised and protected in line with legislation;
- Primary Health Care data requires high security standards to protect it;
- access to a shared data platform data repository (such as Primary Health Insights Platform) and the data within it will be tightly controlled;
- data quality and integrity improvement are essential;

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- Primary Health Networks data governance must complement existing PHN governance bodies and structures;
- provision of assurance and ensuring compliance.
- remaining sustainable and building maturity.

## 2.4 Roles and Responsibilities

### 2.4.1 Primary Health Network
- National Data Governance Committee (NDGC) is the primary governance forum providing oversight and advice on best practice data governance as it relates to data held by PHNs;
- Data Governance Manager has responsibility for managing information across the shared data platforms such as Primary Health Insights Platform, the delivery of the Data Governance Framework, and leads data governance initiatives across community of practice and working groups (as required);
- Data Community of Practice (CoP) is dedicated to innovation, knowledge sharing and uplifting the general data maturity across PHNs in support of shared data platforms;
- Working Groups have a defined data governance focus and output to be delivered within an agreed timeframe.

### 2.4.2 Primary Health Insights Program (PHN Shared Data Platform)
- Primary Health Insights National Manager ensures alignment of data governance capabilities within the PHN Cooperative's Shared Data Platform;
- Primary Health Insights operations team members support implementation of data governance directions provided by the National Data Governance Committee.

### 2.4.3 Primary Health Networks
- Data Sponsors are the senior level executives who undertake duties of ownership on behalf of the organisation;
- Data Custodians are responsible for day-to-day management and oversight of a data set, approval of access to data and the overall quality and security measures;
- Data Stewards are responsible for day-to-day management and operation of a data set, its completeness and quality;
- employees, contractors and students are responsible for protecting the privacy of data they have approval to access.

# 3  Enabling and Sustaining Data Governance

PHN implementation of the policy should be supported by local policies/standards, processes, procedures and tools that enable the Data Governance Framework:
- policies and standards establish the direction and provide a statement of intent;
- processes and procedures describe how core activities are sequenced to enable the data governance capabilities and achieve the desired data governance outcome;
- tools and technology assist with the management of good data governance.

## 3.1.1 Policies and Standards

This policy is required to be supported by local policies / standards that enable good data governance include:

- Policy Domain Data Governance;
- Data Creation, Acquisition, Extraction Transformation and Load;
- Data Quality;
- Data Sharing and Data Release;
- Data Privacy and Data Security;
- Data Ethics;
- Data Use;
- Data Breach;
- Data Retention and Data Disposal;
- Metadata.

## 3.1.2 Processes and Procedures

This policy is required to be supported by processes and procedures that enable good data governance include:
- Notifiable Data Breach and Incident Management process;
- Data Set Privacy Impact Assessment process;
- Cyber and Information Security Management process;
- Data Sharing process;
- Data enquires and complaints handling process;
- Data retention and deletion process;
- Data quality process.

## 3.1.3 Tools and Technology

This policy is required to be supported by toolset that enable good data governance including:
- Data Set Privacy Impact Assessment toolset;
- Data-specific roles and responsibilities toolset;
- Shared data platform self-assessment toolset;
- Shared data platform formal audit onboarding assessment toolset.

# 4  Quality Assurance and Continuous Improvement

The development of a Data Governance Framework provides PHNs and shared data platforms with a comprehensive approach to data governance.

To support PHNs in determining whether they have implemented and maintain a suitable level of data governance, a self-assessment audit program has been developed.

The National Data Governance Committee assists in the ongoing maintenance and development of the Data Governance Framework.

This policy will be reviewed every three years, or where significant updates are made to the PHN Cooperative's Data Governance Framework.

# 5  Contact

For further information on the Primary Health Network Cooperative's Data Governance Policy contact:
PHN Cooperative Executive Officer
E execoffice@phncooperative.org.au

# 6  References

The following publicly available best practice guides were used to inform this document and are publicly available.

Australian Cyber Security Centre. (2020). *Australian Government Information Security Manual.* Retrieved from https://www.cyber.gov.au/ism

Australian Government Department of Health. (2019). *PIP Eligible Data Set Data Governance Framework Canberra.* Retrieved from https://www1.health.gov.au/internet/main/publishing.nsf/Content/PIP-QI_Incentive_guidance.

Australian Institute of Health and Welfare. (2018). *Australia's health 2018.* Retrieved from https://www.aihw.gov.au/getmedia/7c42913d-295f-4bc9-9c24-4e44eff4a04a/aihw-aus-221.pdf.

Australian Institute of Health and Welfare. (2019). *AIHW Data Governance Framework.* Retrieved from https://www.aihw.gov.au/about-our-data/data-governance.

Australian Prudential Regulator Authority (APRA). (2013, September). *Prudential Practice Guide CPG 235 - Managing Data Risk.* Retrieved from https://www.apra.gov.au/sites/default/files/Prudential-Practice-Guide-CPG-235-Managing-Data-Risk_1.pdf

Austrlian Institute of Health and Welfare. (2019, February). *National Primary Health Care Data - Data Development Plan - Exposure draft for consultation.* Retrieved from https://consultation.aihw.gov.au/phcdu/national-primary-health-care-data-asset/.

Canadian Institute for Health Information. (2020). Retrieved from Data and Information Quality: https://www.cihi.ca/en/submit-data-and-view-standards/data-and-information-quality

NSW Ministry of Health: System Information and Analytics Branch. (2019, January). *NSW Health Data Governance Framework.* Retrieved from https://www1.health.nsw.gov.au/pds/ActivePDSDocuments/GL2019_002.pdf

Office of the Australian Information Commissioner. (2017). Retrieved from De-identification Decision-Making Framework: https://www.oaic.gov.au/privacy/guidance-and-advice/de-identification-decision-making-framework/

Office of the Australian Information Commissioner. (2019, July). *Australian Privacy Principles Guidelines/.* Retrieved from https://www.oaic.gov.au/privacy/australian-privacy-principles-guidelines/.

Office of the Australian Information Commissioner. (2019, May). *Notifiable Data Breaches scheme 12-month insights report.* Retrieved from https://www.oaic.gov.au/privacy/notifiable-data-breaches/notifiable-data-breaches-statistics/notifiable-data-breaches-scheme-12month-insights-report/.

Office of the Victorian Information Commissioner. (2018, March). *Victoria Protective Data Security Framework.* Retrieved from https://ovic.vic.gov.au/data-protection/what-is-data-protection/framework-vpdsf/.

Royal Australian College of General Practitioners. (2017, May). *Privacy and managing health information in general practice.* Retrieved from https://www.racgp.org.au/FSDEDEV/media/documents/Running%20a%20practice/Protecting%20practice%20information/Privacy-and-managing-health-information-in-general-practice.pdf

Royal Australian College of General Practitioners. (2018). *Notifiable data breaches scheme.* Retrieved from https://www.racgp.org.au/running-a-practice/security/protec

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