Health Service Executive
National Health Protection Office and Health Protection Surveillance Centre

Data Governance Policy

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Policy Statement

Background

Data Governance is defined as the exercise of authority and control over the management of data assets. The aim of this National Health Protection Office (NHPO) and Health Protection Surveillance Centre (HPSC) Data Governance policy is to set out the roles and responsibilities of NHPO and HPSC data stakeholders, and to bring together all data management related policies and procedures. This will ensure that our data are managed properly, according to best practice.

Purpose

The purpose of the Data Governance Policy is to:

1. Protect NHPO and HPSC data against internal and external threats;
2. Ensure that NHPO and HPSC operates in accordance with Data Protection Regulations;
3. Define the roles and responsibilities for data management within NHPO and HPSC, and to establish clear lines of communication;
4. Develop best practices for effective data management.

Scope

This policy applies to all Public Health / Epidemiological data used in the NHPO and HPSC.

Governance

The National Health Protection Office includes/comprises the Health Protection Surveillance Centre (HPSC) and the National Immunisation Office (NIO) with their individual senior management teams. The National Health Protection Office is led by the Director of National Health Protection (DNHP), supported by a Senior Management Team which includes National Consultant Leads for Surveillance, Immunisation and Health Security (Threats). The National Health Protection Office provides strategic and operational leadership to all Heath Protection surveillance programmes in partnership with HPSC's Senior Management Team.

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Data Governance Policy Overview

The data governance strategy sets out our vision and objectives and it has been informed by the Health Protection Strategy (2022 – 2027) and the National Standards on Information Management for Health and Social Care (2024) as shown in figure 1.
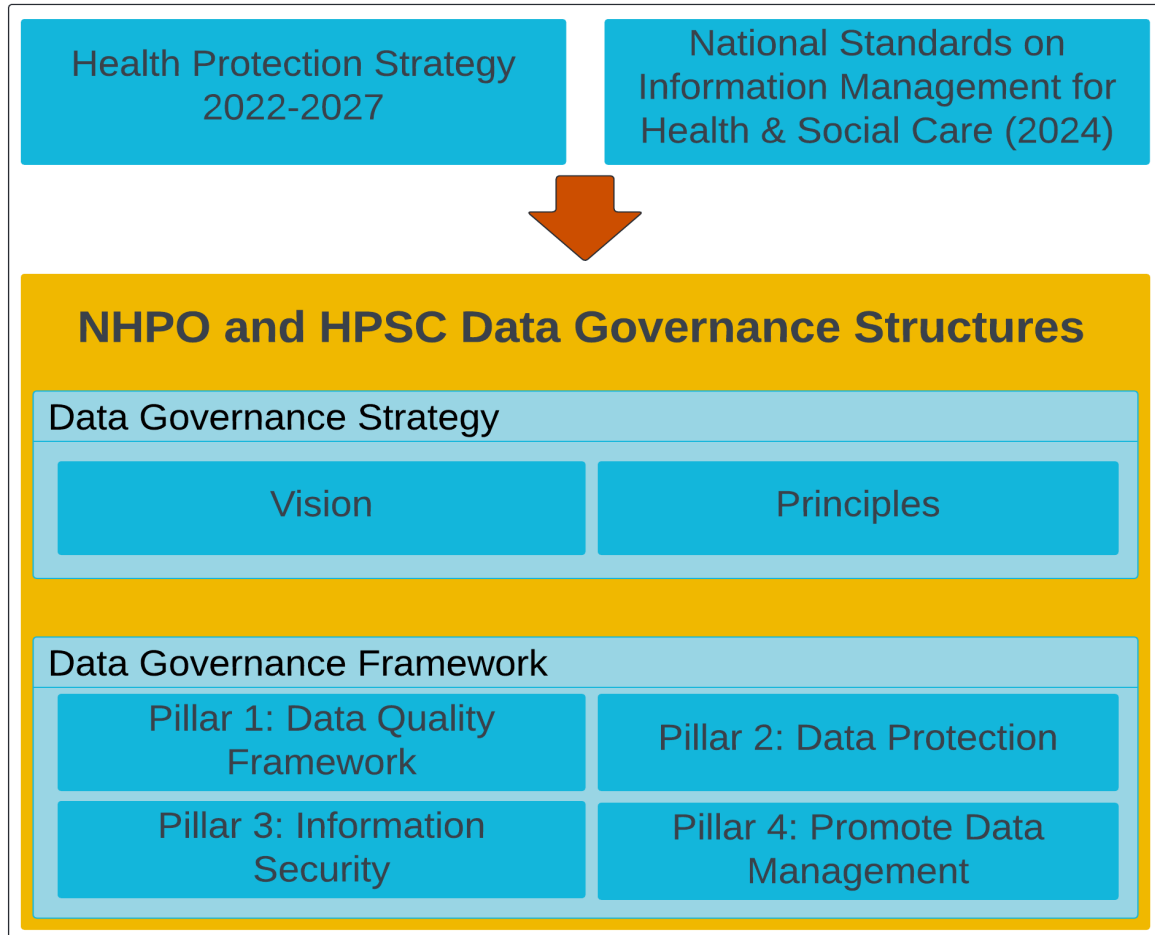

FIGURE 1: DATA GOVERNANCE POLICY OVERVIEW

Data Governance Vision

We endeavour to support the objectives of the [Health Protection Strategy 2022 - 2027](). The Health Protection Strategy states that 11 key enablers must be in place to support the delivery of its objectives. NHPO and HPSC data governance activities will be most effective if they support the following 2 enablers:

1. Provision / acquisition of Information Technology support for development and maintenance of essential health protection systems in order to provide both integrated surveillance and incident management.
2. Provide essential data integration, data quality, and data protection functions that operate in an effective and timely fashion, including utilising individual health identifiers (IHI) and alignment to current and forthcoming health information policy at national and European levels.

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Data Governance Principles

[HIQA's national standards on health and social care](#) list four principles relating to information management. We will adopt these principles to support our data governance strategy. A brief outline of each principle as defined by the standards is presented below. More information is available in the HIQA standards document.

Human Rights Based Approach

To protect the population of Ireland from all hazards associated with key health protection threats, NHPO and HPSC seek to balance the protection and rights of people with the broader societal value of data use for health. We promote transparency on how information is collected used and shared; and restrict access to data based on a strict need-to-know basis.

Safety and wellbeing

NHPO and HPSC need accurate, relevant and timely information to monitor and investigate public health threats in order to protect the population of Ireland. We design, develop and maintain data and systems to ensure that data are available for sharing for secondary use, where appropriate, in order to continuously drive improvements in monitoring and surveillance of public health threats, and in informing prevention and control measures.

Responsiveness

NHPO and HPSC manages information in line with international best practice. Our information management includes work programmes to monitor and promote data quality and information security. Any concerns regarding data security or inappropriate use of data once identified are responded to in accordance with our policies and procedures in a timely manner to mitigate any risks and ensure that lessons are learned to improve quality of service.

Accountability

NHPO and HPSC have appropriate data governance and information security governance arrangements in place to ensure that a strategic approach to information management is followed at all times. Information is managed in a way that is cost-effective and fit for purpose.

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Data Governance Framework

The structure of our data governance framework is based on the principles set out in "Non-invasive data governance" [Seiner; Technics publications; 2014]. This approach places an emphasis on using the existing structures and roles within an organisation to provide better quality data governance. It tries to avoid placing additional workloads on staff and instead utilises existing expertise and roles within the organisation.

We have organised our data governance framework into four pillars. Three of the four pillars align with specific HPSC resources in the areas of data protection, information security, and data quality. The fourth pillar will address all other data management related issues.

Roles and Responsibilities

We want to define some new roles for data governance within the NHPO and HPSC. Any additional responsibilities for staff who take up these roles should be minimal in order to follow the principles of "non-invasive data governance" [Seiner; Technics publications; 2014]. Figure 2 shows the relationship between the roles and their interaction with one another.
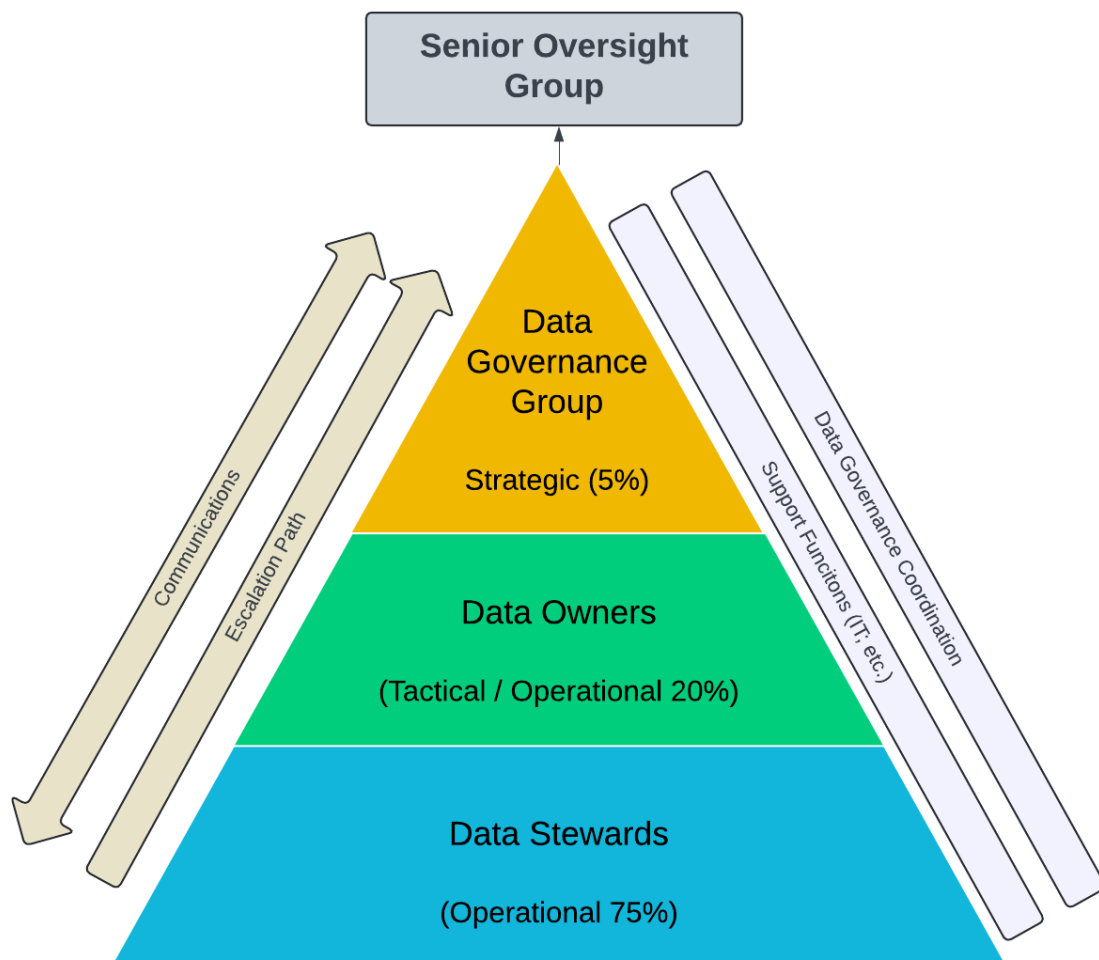

FIGURE 2: DATA GOVERNANCE FRAMEWORK

The table below outlines the new roles and subsequent responsibilities. Data Owners and Data Stewards will need to be assigned across all HPSC and NHPO data collection streams.

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Level	Data Governance Role	Data Governance Responsibility
Operational	Data Steward	A Data Steward: • Accountable for execution of data governance within a domain • Is responsible for ensuring a dataset is fit for purpose. • Is someone who works with the data directly and who might be responsible for tasks such as data creation, data collation, data validation, data analysis, etc. • Is working under instruction and authorisation from the data owner of a dataset.
Tactical/Operational	Data Owner	A Data Owner: • Is a senior stakeholder who is ultimately accountable for a dataset. • Is someone who knows the data very well, but may not work directly with the data on a regular basis. • Is responsible for deciding how the data will be collected and used to meet requirements. • Is responsible for determining the future direction of a dataset through activities like stakeholder engagement. • Is responsible for giving and revoking access to one or more datasets and maintaining records of access controls (appoints data stewards). • Is responsible for ensuring the data quality of a dataset meets the requirements of the data quality framework.
Strategic	Data Governance Working Group	The DG Working Group: • Sets the direction of Data Governance activities and priorities (in consultation with senior leadership of HPSC and NHPO). • Reviews data governance documentation.
Strategic	Senior Oversight Group	The oversight group: • Has an oversight role in relation to Data Governance. • Each department champion/head considers DG implications.
Support	IT, Subject Matter Experts etc.	• Provide subject advice. • Deep understanding of data and infrastructure.

TABLE 1: DATA GOVERNANCE FRAMEWORK ROLES AND RESPONSIBILITIES

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Data Governance Working Group

NHPO and HPSC will nominate data governance working groups in each organisation. The working group will comprise IT staff and clinical / scientific subject matter experts.

Senior Oversight Group

Senior oversight of data governance activities will be provided by senior management at HPSC and NHPO.

Assigning steward and owner roles for individual datasets

NHPO and HPSC teams will determine the staff best placed to fill these roles. Role membership must be recorded in a central repository so that it can be referenced by all NHPO and HPSC staff.