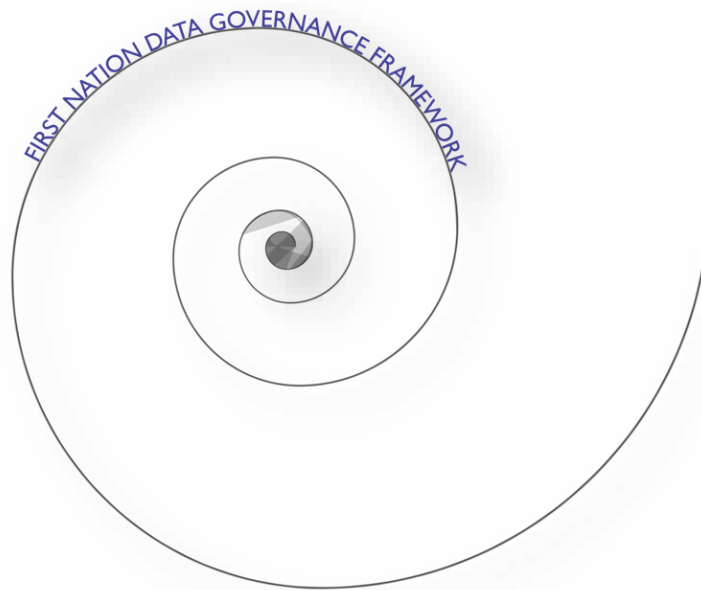# Data Governance Framework

Framework and Associated Tools

<NAME OF NATION>

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Version: V1.0

Mustimuhw Information Solutions Inc.

Data Governance Framework

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Preface

Information is an important resource for our Nation. It has a direct and important impact on the lives of our people. Charting our path for the future is dependent on having accurate and complete information. Combining data and information provides us with knowledge. We are uniquely positioned to translate our data and collate information into meaningful, accurate and relevant knowledge. This knowledge is one of the cornerstones of our culture, identity, traditions, and self-determination. The right to own, control, access, and possess data and information about our people requires us to govern our data wherever it physically resides.

Nation Data resides both internal to our Nation and externally. Data and information about our Nation is managed and distributed by various departments and organizations within our Nation, and among external Parties. Historically, the understanding and appreciation of Nation based control and management of Nation Data has not always been clearly understood or communicated. Many of the historical information sharing arrangements in place were designed to support external Parties and did not adequately integrate the concepts of Nation Data and Nation based Data Governance.

The goal of our Data Governance Framework is to provide a comprehensive framework with specified tools and processes that establish and actualize our Nation's direct and active involvement in owning and controlling the Nation's Data, as governing our Data.

> *Data Governance is the 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]*

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[1] Data Governance.com

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Data Governance Framework

The Data Governance Framework is a collection of strategy, structure, legislation and policy and related tools. It will evolve and grow in iterative cycles of expansion and refinement as our needs and capacities change and grow over time. We represent it therefore as a spiral to reflect the dynamic and evolving nature of the framework and our actualization of it. The spiral begins with our data governance vision and principles.
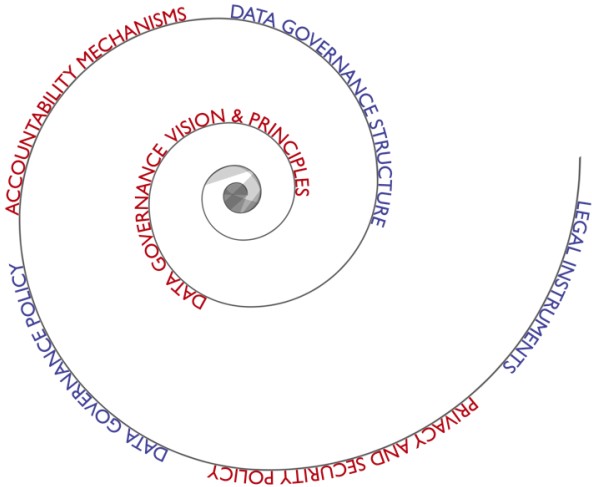
Figure 1- Data Governance Framework Diagram

There are six core elements of the Data Governance Framework:

1. **Data Governance Vision and Principles**
   - Foundational strategic tenants that guide all aspects of the framework and its implementation.
2. **Governance Structure**
   - The conceptual and organizing structure and associated roles for the governance, including Stewardship, of our Nation's data.
3. **Accountability Mechanisms**
   - Clear accountability focus and requirements, and associated mechanisms.
4. **Data Governance Policy**
   - Policies, procedures, and tools related to our governance of Nation Data -e.g. data standards, definitions, and implementation methods.
5. **Privacy and Security Policy**
   - Policies, procedures, and tools related to our management and protection of Nation data and privacy compliance.
6. **Legal Instruments**
   - Legal requirements and legal agreements for Data Governance enactment e.g. legislation, data governance agreements, data sharing agreements etc.

The Data Governance Framework encompasses all data stored within our Nation, as well as Nation Data stored and/or managed externally by another Party.

1.0 Data Governance Vision & Principles

Our Data Governance Framework is rooted in our vision for Data Governance and core guiding principles that inform all aspects of our approach and maintenance of Data Governance for our Nation.
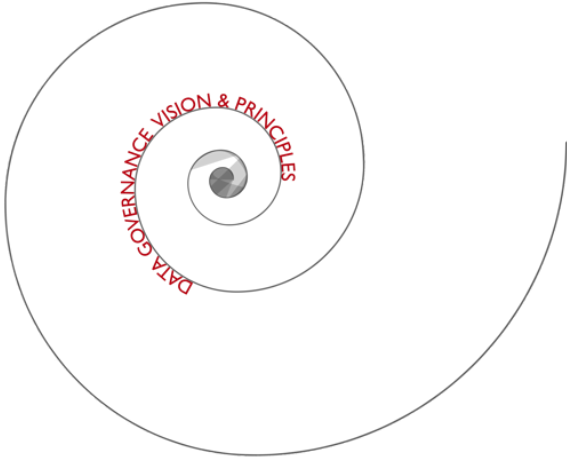
1.1 Vision

> Our Nation governs and protects all Nation data and information, wherever it resides, supporting the needs of our Nation, communities, Nation Organizations, and Members, as well as the needs of the partners we collaborate with.

1.2 Principles

The Data Governance Principles apply to data stored within our Nation and, wherever applicable, to data stored externally by other Parties. The Principles apply and are maintained as part of the expanding and evolving implementation of our Data Governance Framework.

The Data Governance Principles guide our Nation Leadership and governing bodies, Nation Managers, Staff, and our Data Stewards, in the fulfillment of our commitment and responsibility to our people and to society regarding the data we are entrusted to govern.

Below are the nine key principles guiding our Data Governance Framework.

<table>
<tr>
<td rowspan="2">PRINCIPLE – 1</td>
<td colspan="2">Our Nation, through the Stewardship Model described in our Data Governance Framework, governs all Nation Data, regardless of where it is stored or how it is identified.</td>
</tr>
<tr>
<td></td>
<td>The First Nation's Information Governance (FNIG) organization refers to 'Ownership' as:

<blockquote>… the relationship of a First Nation's community to its cultural knowledge/data/information. The principle states that a community or group owns information collectively in the same way that an individual owns their personal information.[2]</blockquote>

Our Data Governance Framework outlines the structure and means by which our Nation exerts ownership over Nation data, wherever the data resides.

    a. Nation Data stored within our Nation is considered owned by the Nation and stewarded using this Framework.

    b. It is recognized that other Parties provide services and support to our Nation and therefore collect and store Nation Data. Furthermore, we disclose Nation Data to various partners. Ownership over Nation Data created by another Party or disclosed to another Party is established to</td>
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</table>

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[2] First Nation's Information Governance – The Components of OCAP[TM]

		enable our Nation's Stewardship over the Data.

PRINCIPLE – 2		All undertakings and publications that involve identifiable Nation Data will be culturally appropriate and benefit the well being of our Nation. To ensure this occurs the Data Governance Board will be involved in all aspects of management over Nation Data.
		The First Nation's Information Governance organization refers to 'Control' as:
		…First Nation's, their communities and representative bodies are within their rights in seeking to control over all aspects of research and information management processes that impact them. First Nation's control of research can include all stages of a particular research project-from start to finish. The principle extends to the control of resources and review processes, the planning process, management of the information and so on.[2]
		By enabling governance, specifically Ownership (see Principle #1 above), over all Nation Data wherever it resides, our Nation will be able to collaborate with departments, Nation Organizations, and partners to develop processes for approving and managing data including research initiatives. All initiatives that involve identifying Nation Data will be culturally appropriate and benefit the well being of our Nation.

PRINCIPLE - 3		The Data Governance Board will develop and maintain processes that ensure access to Nation Data is enabled in a secure and protective manner regardless of where it is stored.
		The First Nation's Information Governance organization refers to 'Access' as:

The First Nation's Information Governance organization refers to 'Access' as:

> ...First Nation's must have access to information and data about themselves and their communities, regardless of where it is currently held. The principle also refers to the right of First Nation's communities and organizations to manage and make decisions regarding access to their collective information. This may be achieved, in practice, through standardized, formal protocols. [2]

Access to data is a compilation of trust, procedural controls, and audits. Managing access to Nation Data will be strictly guided by policy and procedures, in particular as outlined in the sections Data Governance Policy and Privacy and Security Policies. For data stored internally the access controls are developed and maintained jointly by the Data Governance Board, Nation Managers, and Data Custodian. The Data Governance Board must approve the final procedures. For data that our Nation governs, but is stored externally and managed by other Parties, the access procedural controls are developed and maintained jointly by the Data Governance Board, Nation managers, and the other Party's Data Custodian(s).

Key considerations guiding our management of access to data will include:

a. All individuals collecting or accessing Nation Data must be aware of our Data Governance Framework and subsequently provide written acknowledgement prior to collecting or accessing data.
b. Any individual accessing data must have a purpose to access the data that aligns with their documented duties and responsibilities. This applies to all Nation data regardless of where it is stored.

		c. Our employees accessing data must be aware of our Data Governance and Privacy and Security policies/procedures and subsequently provide written acknowledgement prior to collecting or accessing data. External parties must also demonstrate equivalent practices. d. Access must be provided using the "least privilege" and "need to know" principle. e. Employee access to internal data must be authorized in accordance to the applicable access policy/procedure(s) developed by the Data Governance Board. Additionally, external parties must also demonstrate equivalent practices. f. Access audits must be performed on a regular basis to confirm that user access to data is appropriate. Access Audit policy/procedure(s) are developed by the Data Governance Board. External parties must also demonstrate equivalent practices. g. Access breaches and security incidents will be managed in accordance to policies/procedures developed by the Data Governance Board. Additionally, external parties must also demonstrate equivalent practices.
PRINCIPLE - 4		The Data Governance Board will promote the creation, maintenance, and storage of Nation Data within its own environments whenever feasible. Nation Data stored in another Party's environment will be governed by the Nation Stewards in accordance with our Data Governance Framework.
		The First Nation's Information Governance organization refers to 'Possession' as: ...While ownership identifies the relationship between a people and their information in principle, possession or stewardship is more concrete. It refers to the physical control of data. Possession is a mechanism by which ownership can be asserted and protected. [2] As per the preface, defining our path for the future is dependent on having accurate and complete information. Combining data and information provides us with knowledge. Our people are uniquely positioned to translate our data and collate information into meaningful, accurate and relevant knowledge. Managing Nation Data within our premises provides greater control over the data and builds capacity and skills within our Nation. With the appropriate resources and

<table>
<tr><td></td><td></td><td>skills this enables us to obtain information and collate it as and when required.

Where it is not feasible to manage data within our Nation premises we will assert possession by establishing our Nation Stewards to govern the data. Additionally the Data Governance Board will use secure technology and processes to enable equal control.</td></tr>
</table>

PRINCIPLE – 5	All Data Governance standards and policies affecting Nation Data are established by Data Governance Board.
	The Data Governance Board will develop data identification and management standards/policies and implement them internally as well as incorporate them into data governance agreements, information sharing agreements, etc. The outcome will be a consistent, accurate and complete set of Nation Data governed by our Nation using consistent standards and policies.

| PRINCIPLE – 6 | The Data Governance Board will establish policies and procedures regarding the collection and use of Nation Data and establish mechanisms to monitor compliance with these policies and procedures. |
| | |

		Key considerations guiding our management of Data Collection and Use will include: a. Our Nation must have a documented purpose for collecting data that is associated with supporting our [Community/Communities], Nation Members and other Nation interests. b. Human Related information must be collected directly from the individual or guardian; or authorized by applicable law. An Information Sharing Agreement must be enabled before data can be collected from another Party. c. Data collected must be managed in accordance with our Nation's Privacy and Security policies and procedures.
PRINCIPLE - 7		The Data Governance Board will promote specific policies and procedures to guide data disclosure.
		Key considerations guiding our management of Data disclosure will include: a. When data is disclosed to a Party the Party must have a valid purpose for receiving the information. The valid purpose must benefit our Nation and/or Nation Member(s) and be consistent with the purpose for which the data was collected. b. When data is disclosed our Nation will be directly involved in the interpretation, analysis, translation, and management of the data. c. When data is disclosed it must be supported by applicable law and enabled by an Information Sharing Arrangement. d. When data is disclosed to a Party for the purpose of doing Research it must be approved in accordance with the applicable Data Governance Policy/Procedure and must be enabled by an Information Sharing Agreement.

IPL		Electronic Nation Data stored in a system and disclosed to another system must have the approval of the Data

<table>
<tr><td></td><td colspan="2">Governance Board.</td></tr>
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Information technology provides the opportunity to share information that use tools that replicate data (e.g. printing and faxing data to another department, Nation Organization or other Party, uploading and downloading data using import / export features available in applications such as Excel or exchanging data using computer based system-to-system interfaces).

These interfaces enable data sources to be:

- More accurate and complete as it prevents the need to maintain paper-based data and manual data-entry processes
- More secure by enabling access through computer-based tools so that there is a clear audit trail of access provided to only those that require access to the data
- More timely once implemented as it reduces the need for manual intervention
- More informative as they can be combined with other data more efficiently

When data is stored in more than one system it is important to maintain data integrity and apply a consistent approach to managing the data that is culturally appropriate and benefits the well being of our Nation. Additionally the implementation of interfaces results in a disclosure of information. As such interfaces must support our Data Governance Framework before data transfers; processes and interfaces are developed or implemented. The Data Governance Board must approve these interfaces.

</td></tr>
</table>

CIPL		The Nation will protect the privacy of individuals.

		Our Nation Members, customers, and Staff entrust us to be respectful and responsible stewards over their personal information. They have legal rights that require us to maintain and protect their personal information.

Although it may be anticipated to share the personal information with other partnering service providers we must do so only when required and in direct support of the wellness of the individual. To share their identifiable information with a partnering service provider we must inform our Nation Members, customers, and Staff whenever possible. As joint stewards with our partners we must protect their information using the same practices, commitments and obligations.

The Data Governance Board will develop policies and procedures to protect the human related data that aligns with a individuals legal right; and will ensure information sharing arrangements support our Data Governance Framework. |

2.0   Governance Structure

The governance structure is the method and organizing processes we use to establish and maintain accountability and protection for the Nation Data as a resource. It considers how we will manage the Framework, and describes the associated roles and responsibilities.
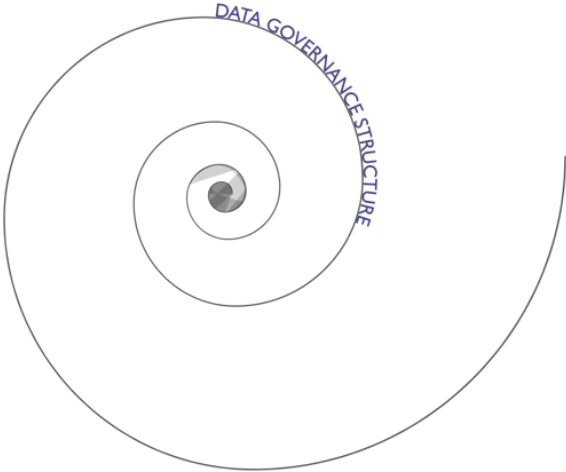
2.1   Data Types

Our governance structure and management processes are designed in recognition of the following important facets of Nation Data.

Nation Data exists both internally within the Nation and externally.
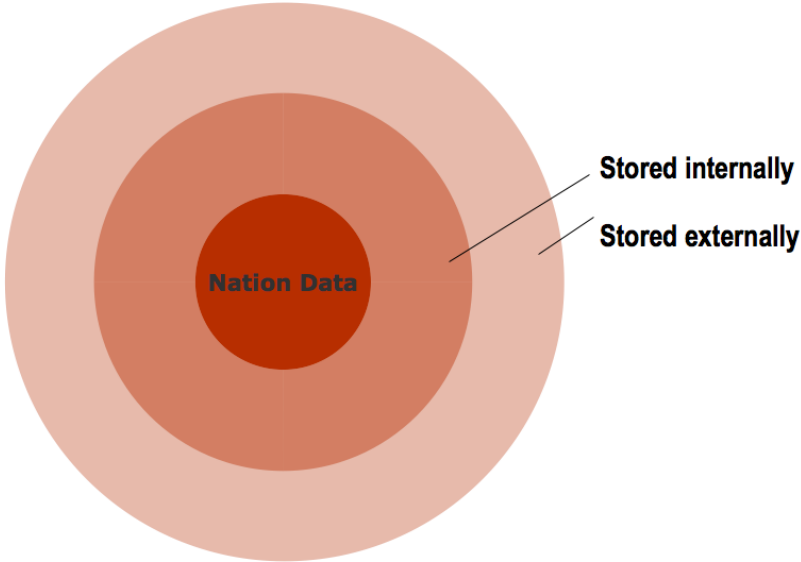
When data includes our Nation's identity it becomes **Nation Data**. Accurate information is dependent on having a complete set of data. Nation Data is therefore any data, information and knowledge about our Nation regardless of where it physically resides. Having a clear understanding of the scope of Nation Data allows us to "blanket" that data under the protection of our Nation's Governance.

The Data Governance Framework further categorizes Nation Data within four sectors: Corporate, Cultural, Human, and Lands & Resources.

Data associated with the management of our Nation, and its various departments and organizations, is **Corporate** data. Some of the corporate information may be protected by federal or provincial legislation (e.g. corporate laws, income tax laws, etc.), funding agreements etc. Inappropriate or inaccurate collection, use, and disclosure of corporate information may cause significant harm to our Nation, our Nation Organizations, and/or Nation Members. In turn not providing adequate information to Nation Members and partners may cause distrust. Blanketing this sector of data under our Nation's governance provides protection and strength.
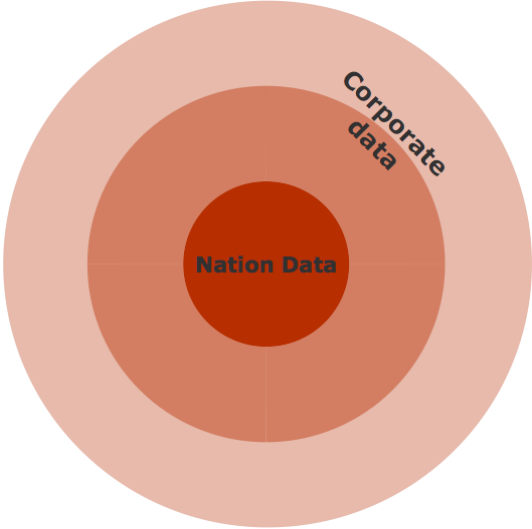
Cultural information includes our teachings and our extensive body of knowledge, beliefs, and practices (e.g. language, thoughts, communications and stories, actions, customs, beliefs, and belief systems/practices), as well as knowledge of our territories and the resources on our lands and our use and protection of these resources. Our Nation's **Cultural** data and information is both sacred and proprietary to our people and is not disseminated without 'permission' from our Nation. As this information is not protected by federal or
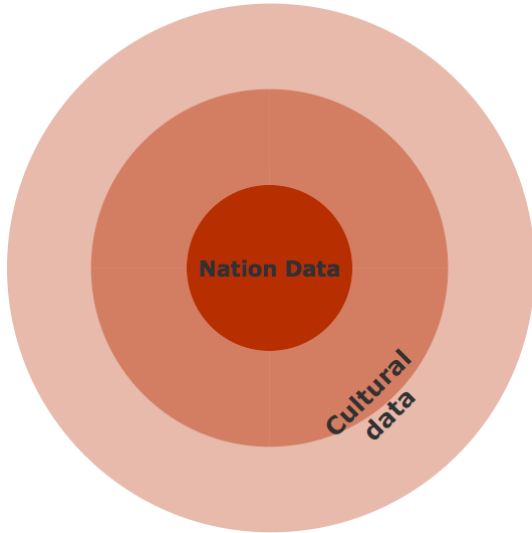
provincial legislation it is important that we have a protective blanket over this information as part of our Nation's data governance that supports the needs of our Nation.

Data that identifies a single individual is considered personal information or data. Because a considerable portion of our Nation data exists within the realm of health and human/social services, we refer to this sector of data as **Human Related** data. The identity of an individual may also include the identity of our Nation. Therefore Nation Members Human Related data is considered Nation Data.

Human Related data requires a robust level of privacy that respects the individual and supports the federal and provincial legislation that is applicable to our Nation and important to Nation Members, non-Member clients/customers, and partners.

Human Related data, often referred to as Personal Information, is protected under federal and provincial laws, regulations and formal/informal information sharing arrangements that need to be reviewed and transformed to ensure alignment with our Data Governance Framework and must be designated as Nation Data. Human related
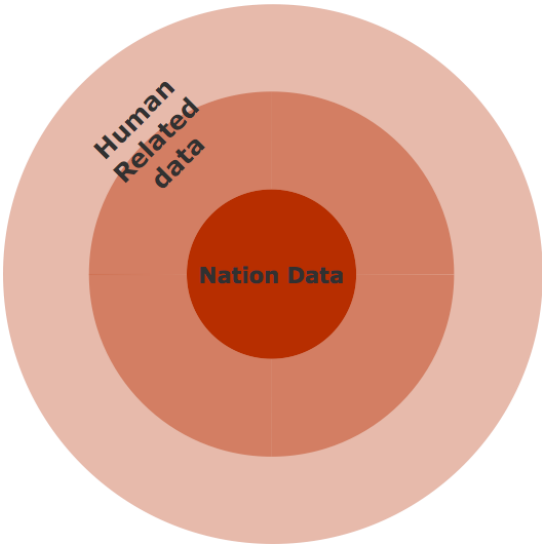
data is a core fiber of Nation Data.

Information about our **Land and Resources** is Nation Data. Data associated with surrounding lands and resources is also pertinent to the good management of our lands and resources. Furthermore the data we hold may affect others. Therefore we must govern the Nation Data and have access to external data to support our [community/communities], to fulfill our responsibilities and protect our economic interests. Land and resource data are integral to providing strength and longevity over one of our data types.
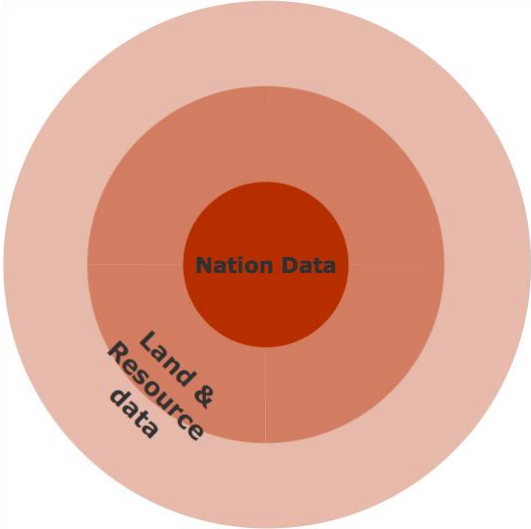
The four sectors of data described above may be represented discreetly at times but ultimately it is the collective relationship of

one category to another that provides holistic knowledge to our Nation.

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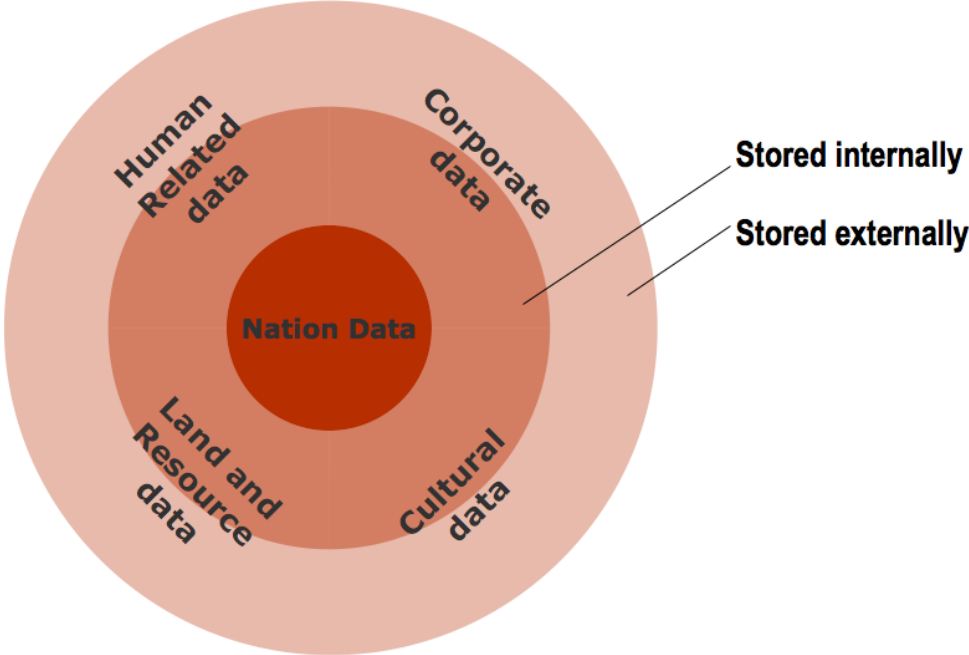
2.2 Organizing Structure

The governance structure that will be used to protect the Nation Data consists of a Data Governance Board, made up of an Executive Data Steward / Chair who will act as the Chair and four (4) Data Stewards who will provide expertise and support for one of the four data types: Corporate Data, Cultural Data, Human Related Data and Land and Resource Data.

Where applicable Data Steward Subject Leads are assigned to support and liaise with a particular Data Steward(s) (see figure 3). The model also accommodates scaling to a multi-community configuration where required, with a single community Data Steward Subject Lead delegating stewardship to each of the four collective Data Stewards.

The Data Governance Board reports directly to Chief and Council. When/if extended to a multi-community model, the single Data Governance Board reports to the respective Chiefs and Councils through the community-level Data Steward Subject Lead. Additionally the Data Governance Board will retain designated Administrative support, Data Custodian support, and access to Legal Counsel.

Figure 2 - Base Governing Structure
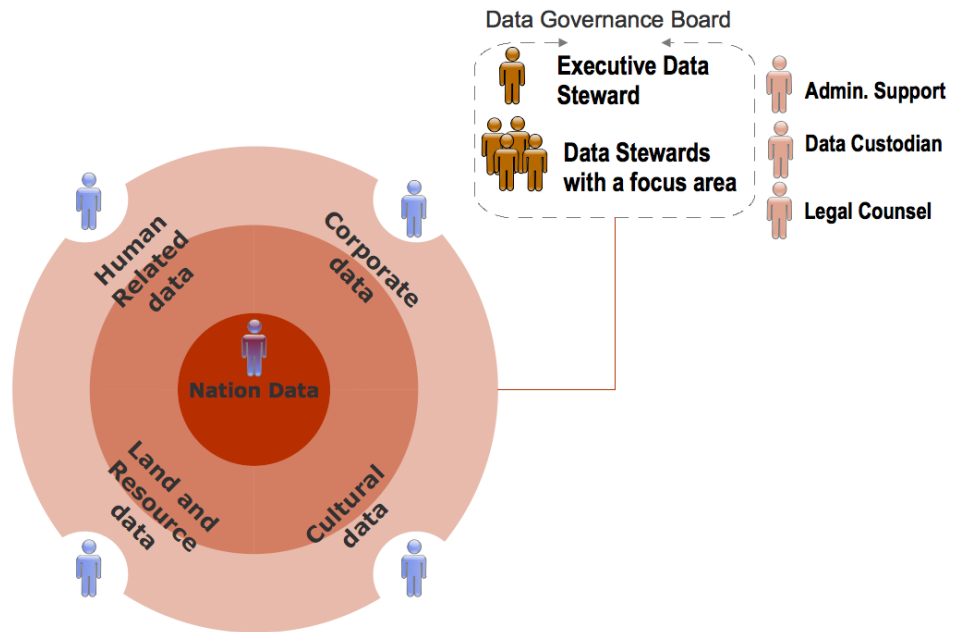
Figure 3 - Base Structure with e.g. distributed Data Steward Subject Leads
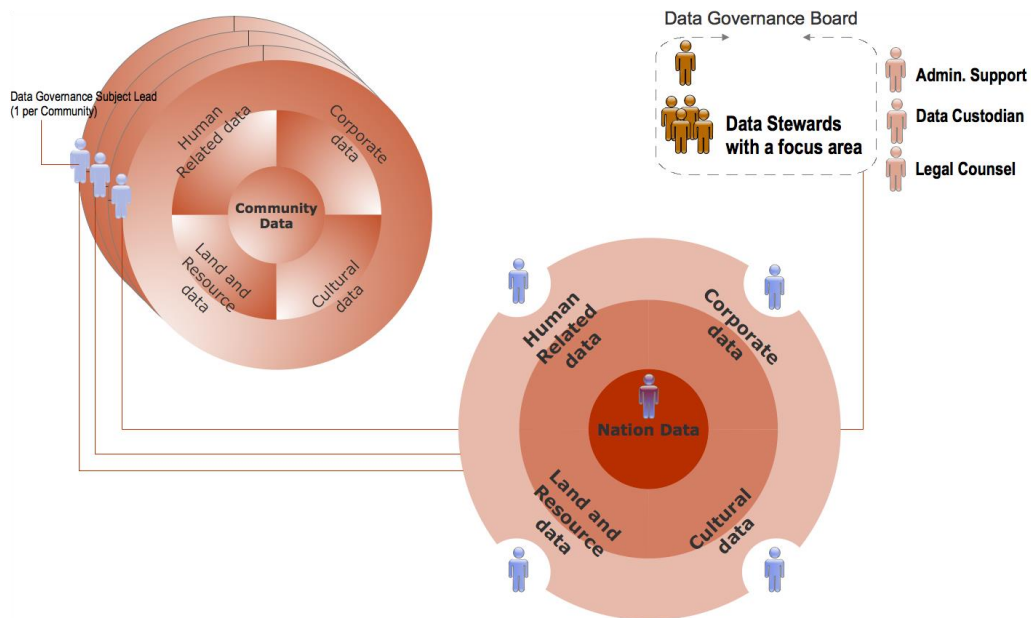
Figure 4 - Multi-Community Nation Structure
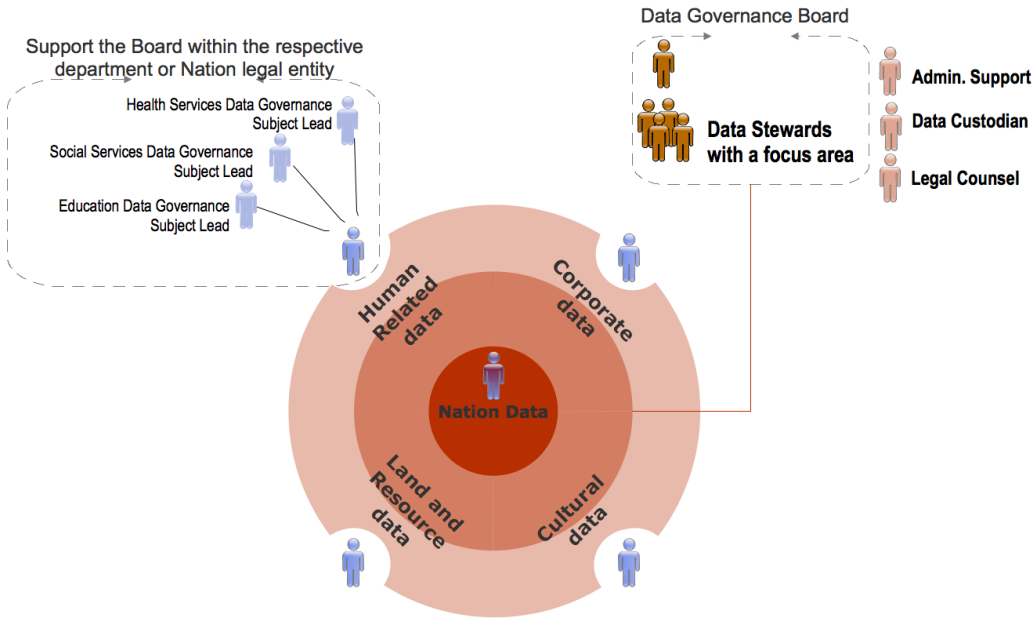
2.3   Active Board Resource Registry

The Data Governance Board will retain no less than five (5) Board Members to ensure adequate capacity, diversity and separation of duties. The Board Members and Data Custodian must be employees of our Nation.

The roles are assigned as follows:

Role	Employee Position Title and Name of Current Incumbent
Executive Data Steward / Chair	**[insert title], [insert name]**
Corporate Data Steward	**[insert title], [insert name]**
Cultural Data Steward	**[insert title], [insert name]**
Human Related Data Steward	**[insert title], [insert name]**

Land and Resource Data Steward	**[insert title], [insert name]**

The Data Governance Board is accountable for the stewardship of our Nation Data. This includes practicing caring and responsible methods for the overall management and protection of Nation Data in accordance with the Vision and Principles defined in the Data Governance Framework as well as ethical principles, legal requirements, and general standards and policies. The Stewards do not "own" the data but instead are trusted agents and overseers of the data. Their primary focus is to evolve, monitor, and enhance the Data Governance Framework for our Nation.

Although accountability is assigned to the Board it is understood that it is the collective obligation of everyone (i.e. Nation Leaders, Board Members, Nation Members, Employees, Clients/customers, and Partners) to implement and maintain governance over our Nation Data. The Board will work together with Nation Leaders and Nation Managers, Nation Members, clients/customers, and partners to understand our Nation Data, identify requirements, and implement data governance.

2.4   Data Governance Board Roles and Responsibilities

The Executive Data Steward / Chair has overall accountability and responsibility to understand the complexity of managing our Nation Data. The Executive Data Steward / Chair is also responsible to ensure the Board functions in a collaborative and positive manner that balances the needs of the Nation and its Nation Organizations with the needs of our clients/customers and partners.

Each Data Steward is assigned the role of supporting a specific data sector however it is important to recognize that governance considers the Nation Data as a whole. For example:

A water event occurs and we learn there are contaminants, which affect residents in a house and our lands. Our Nation communicates the event using traditional methods and attends to this issue with a combination of cultural knowledge and western medicines. A financial impact occurs.

Land and Resources reports on Housing but if they are too specific the report could re-identify the residents resulting in a need to consider Human Related data, Three (Cultural, Corporate, and Human Related) of the four data types are involved and thus three of the four Data Stewards support the needs of the Nation.

The health centre, cultural providers, and regional health care providers supports the residents, which may be a Nation Member or non-members. The event is reported and may or may not be identifiable Human Related data or it may be aggregated and in theory may be de-identified but because it is a small set of data could be re-identified by combining it with the Land and Resource data; or it could be the data could be assumed to be associated with a household or land area which is deemed inferred information that may be correct/incorrect. In this case the Land and Resources and Human Related Data Stewards may need to be involved and collaborate together to ensure the needs of the nation are appropriately considered.

Furthermore when a financial impact is reported it may disclose specific locations that could be attributed to a family or individual; or a section of our lands or another parties land. Thus needs the Corporate Data Steward needs to be involved to ensure the needs of the Nation are appropriately considered.

In essence each of our departments, Nation Organizations, and/or partners has an important singular focus but when the blanket of protecting Nation Data is draped over the event a different fiber may need to be woven into what data is collected or shown/disclosed. The answer is in providing the right balance of needs to support all parties of interest.

The following tables outline the responsibilities for each of the Data Governance Board Members.

Executive Data Steward and Chair of the Data Governance Board

Work collaboratively with the Board, Nation employees, Nation Members, clients/customers, and Partners to support and transform data governance in a manner reflective of our Nation.
Chairs Data Governance Board meetings, ensures meeting arrangements are made including setting agendas, establishing regular meetings, and recording the meeting results..
Raise awareness of the Data Governance Framework amongst our Nation Leaders, Nation Members, and partners; advocating governance over all Nation Data wherever it resides; receive framework change requests, put forward changes to Nation Leadership; and communicate changes.
Management of the Board, including supervision of the roles/responsibilities of the data stewards, admin support, and data custodian in context of the Data Governance Framework. Support skill development for the Data Governance Board and support resources and Staff in the area of data governance and privacy and security.
Assign stewardship responsibility for data types to applicable data stewards.
Lead and guide the Data Stewards and support team Members.
Collaborate with Data Custodians both inside and outside our Nation to develop applicable policies/procedures and audits to ensure the data is protected and access complies with the Data Governance Framework.
Seek legal counsel on all legal matters to ensure the Nation is protected and risks are identified. Report risks to Nation Leaders.
Reporting on the Data Governance Framework, including planning, funding requirements, implementation progress and assessment, financial management, identifying areas for improvement, etc.
Developing data governance action items and obtaining decisions, maintaining the decision matrix, communicating the results of decisions.
Participate in transformational change activities.
Develop and obtain approval, and implement data standards and definitions; and data collection, access, use, and disclosure standards, policies, and procedures.
Develop and obtain approval and implement data governance policies and procedures and privacy and security policies and procedures.
Develop policies/procedures for privacy and security breach incidents and investigations; and maintain a ledger of such incidents and report them to the Data Governance Board and Nation Leadership. Lead privacy audits; lead breach investigations and act on the outcomes of an investigation.
Develop data governance compliancy policies and procedures regardless of where data resides; review

and monitor compliancy reports, develop and manage action plan(s) the implementation of the action plan(s). Maintain a ledger of compliancy incidents and risks and report to the [Band Council].
Develop Data Governance Agreements and Information Sharing Agreements that support the Nations Data Governance Framework; and sign such agreements. (Note, these may be co-signed by other Nation Members, Nation legal entities, or Nation managers as required.)
Ensure data quality (accuracy and completeness) is maintained. Develop, obtain approval and implement applicable data quality policies and procedures.
Ensure ongoing monitoring and assessments of the Data Governance Framework, including compliancy with and implementation of data governance and privacy/security policies/procedures is completed.
Maintain a ledger of data disclosures requests, data governance agreements, and information sharing agreements; and report the ledger to the Data Governance Board and [Band Council]. Furthermore as/when awareness that disclosures have occurred that fall outside of legislation, policies, data governance agreements, or information sharing agreements, report such disclosures to the Data Governance Board and Nation Leadership.
Ensure the purpose for collecting, using, and disclosing Nation Data aligns with the Data Governance Framework.
Ensure data governance policy activities are occurring, including creating maintaining data flow diagrams, maintaining the data asset inventory log, ensuring data is classified accurately and appropriately, providing data quality guidance, working with partners to adopt the data standards, support the development, implementation, and management of a Member registry, assess impact of changes and develop recommendations, manage and report incidents and make recommendations, evaluate information sharing event logs and take appropriate action, support the establishment of data governance agreements and information sharing agreements and monitor the compliance to such agreements; oversee and approve data governance awareness and training materials and oversee the implementation of training, evaluate and refine data governance definitions, etc.
Ensure our Nation meets the legislative authorities for protecting privacy.
Overall responsibility for information security and managing Nation data.
Ensure other Parties who collect and store Nation Data adhere to and support our Data Governance Framework.
Ensuring Privacy Impact Assessments and Security Threat and Risk Assessments are completed; approving these assessments, developing and managing risk mitigation action plans.
Verify Data Governance Framework accountabilities and responsibilities are defined in the job descriptions

of the Data Governance Board Members and support team Members, Nation managers, and Nation Staff.
Lead Privacy Officer to individuals.
Review and support Business Continuity Plans; develop action plans; and monitor/support the action plans.
Reviews and co-approves Ministry of Health Software Conformance Standard reports.

Corporate Data Steward
Work collaboratively with the Board, Nation employees, Nation Members, clients/customers, and Partners to support and transform data governance in a manner reflective of our Nation.
Using supportive methods understand, document and analyze Nation Data within [insert names of corporate departments such as Finance Department, Human Resources, Band Council, etc.]; and provide data governance implementation support to these entities.
Develop, analyze, and provision the Executive Data Steward / Chair, Data Governance Board and Data Custodian in fulfilling their roles and responsibilities. .
Attend Data Governance Board meetings and provide input, guidance, and recommendations to the Executive Data Steward / Chair. Advocate for the Nation Organization entities, Nation Members, clients/customers, and Partners.
Identify Data Governance Framework compliancy challenges and recommend actions.
Support the activities defined in the data governance policies.
Privacy Officer for assigned Nation departments.
Create/maintain data governance and privacy posters, pamphlets and telephone scripts.
Support the development and maintenance of Business Continuity Plans; put forward the plans to the Data Governance Board; and assist in developing action plans.
Co-develop and co-implement Data Access Audit procedures.

Cultural Data Steward
Work collaboratively with the Board, Nation employees, Nation Members, clients/customers, and Partners to support and transform data governance in a manner reflective of our Nation.
Using supportive methods understand, document and analyze Nation Data that pertains to our cultural heritage and knowledge, including [insert specifics]; and provide data governance implementation support to applicable entities.
Develop, analyze, and provision the Executive Data Steward / Chair, Data Governance Board and Data Custodian in fulfilling their roles and responsibilities. .
Attend Data Governance Board meetings and provide input, guidance, and recommendations to the Executive Data Steward / Chair. Advocate for the Nation Organization entities, Nation Members, clients/customers, and Partners.
Identify Data Governance Framework compliancy challenges and recommend actions.
Support the activities defined in the data governance policies.
Privacy Officer for assigned Nation departments.
Create/maintain data governance and privacy posters, pamphlets and telephone scripts.
Support the development and maintenance of Business Continuity Plans; put forward the plans to the Data Governance Board; and assist in developing action plans.
Co-develop and co-implement Data Access Audit procedures.

Lands and Resources Data Steward
Work collaboratively with the Board, Nation employees, Nation Members, clients/customers, and Partners to support and transform data governance in a manner reflective of our Nation.
Using supportive methods understand, document and analyze Nation Data within [insert names of the applicable departments such as Lands, Fisheries, Housing, etc.]; and provide data governance implementation support to these entities.
Develop, analyze, and provision the Executive Data Steward / Chair, Data Governance Board and Data Custodian in fulfilling their roles and responsibilities.
Attend Data Governance Board meetings and provide input, guidance, and recommendations to the Executive Data Steward / Chair. Advocate for the Nation Organization entities, Nation Members,

clients/customers, and Partners.
Identify Data Governance Framework compliancy challenges and recommend actions.
Support the activities defined in the data governance policies.
Privacy Officer for assigned Nation departments.
Create/maintain data governance and privacy posters, pamphlets and telephone scripts.
Support the development and maintenance of Business Continuity Plans; put forward the plans to the Data Governance Board; and assist in developing action plans.
Co-develop and co-implement Data Access Audit procedures.

Human Related Data Steward
Work collaboratively with the Board, Nation employees, Nation Members, clients/customers, and Partners to support and transform data governance in a manner reflective of our Nation.
Assist in the development, analysis, implementation, and monitoring of the Data Governance Framework within the subject areas of [insert name, e.g. Health Services, Social Services, etc.].
Develop, analyze, and provision the Executive Data Steward / Chair, Data Governance Board and Data Custodian in fulfilling their roles and responsibilities. .
Attend Data Governance Board meetings and provide input, guidance, and recommendations to the Executive Data Steward / Chair. Advocate for the Nation Organization entities, Nation Members, clients/customers, and Partners.
Identify Data Governance Framework compliancy challenges and recommend actions.
Privacy Officer for assigned Nation departments.
Create/maintain data governance and privacy posters, pamphlets and telephone scripts.
Support the development and maintenance of Business Continuity Plans; put forward the plans to the Data Governance Board; and assist in developing action plans.
Co-develop and co-implement Data Access Audit procedures.

2.5   Data Governance Board – Support Team Members

The Data Governance Board will be supported by Data Governance Subject Leads, Data Custodian, an Administrative Clerk, and Legal Counsel.

Role	Employee Position Title and Name of Current Incumbent
Data Governance Subject Leads	**[insert title], [insert name]**
Data Custodian	**[insert title], [insert name]**
Administrative Clerk	**[insert title], [insert name]**
Legal Counsel	**[insert title], [insert name]**

2.6   Support Team Members Roles and Responsibilities

The following tables outline the responsibilities for each of the Data Governance Board support team Members.

Data Governance Subject Leads
Work collaboratively with the Board, Nation employees, Nation Members, clients/customers, and Partners to support and transform data governance in a manner reflective of our Nation.
Work collaboratively with the Data Governance Board, Nation employees, Nation Organizational entities, Nation Members, clients/customers, and Partners to support and maintain data

governance in a manner reflective of our Nation.
Assist the respective Data Steward in the development, analysis, implementation, and monitoring of the Data Governance Framework within a specific subject area; including identifying priorities, raising awareness, bringing internal and external parties together to achieve the Data Governance Framework Vision.
Assist with the coordination of departmental/focus meetings and attend applicable meetings on an as-needed basis.
Attend Data Governance Board meetings as required.

Data Custodian
Work collaboratively with the Board, Nation employees, Nation Members, clients/customers, and Partners to support and transform data governance in a manner reflective of our Nation.
Work collaboratively with the Data Governance Board, Nation employees, Nation Organizations, Nation Members, clients/customers, and Partners to support and maintain data governance in a manner reflective of our Nation.
Attend Data Governance Board meetings and provide input, guidance, and recommendations to the Executive Data Steward / Chair. Advocate for the Nation Organization, Nation Members, clients/customers, and Partners in the context of protection of Nation Data.
Identify Data Governance Framework compliancy challenges and recommend actions.
Using supportive methods understand, document, analyze, and recommend controls (e.g. data governance policies, privacy and security policies and procedures, facility management procedures, etc.) that protect Nation Data that is stored internally. Implement and support the approved controls. Develop processes for assessing these controls (e.g. testing computer-based systems, testing alarm systems, conducting security threat and risk assessments, etc.) Where applicable coordinate resources that will conduct an assessment of the controls; and report the results, impacts, and mitigation recommendations. Implement approved recommendations.
Assess and report on the controls that protect Nation Data that is stored externally; including identifying risks, understanding impacts of the risk, and making recommendations to the Board.
Work collaboratively to identify and contain security incidents/breaches.

In the context of physically protecting Nation Data develop, analyze, and provision the Executive Data Steward / Chair, Data Governance Board and Data Custodian in fulfilling their roles and responsibilities.
Verifying/approving the content of the data assets and confirming they meet the needs of the Nation.
Develop and implement Data Access procedures; co-develop and co-implement Data Access Audit procedures.

Administrative Clerk
Support the Data Governance Board by coordinating meetings, drafting meeting minutes, distributing agendas, minutes, supporting materials, manageing documentation, updating ledgers, and other duties as required.
Support Data Governance Subject Leads as required.
Direct Data Governance Framework inquiries to the appropriate Board Members.
Attend Board Meetings and other ad-hoc meetings as required.

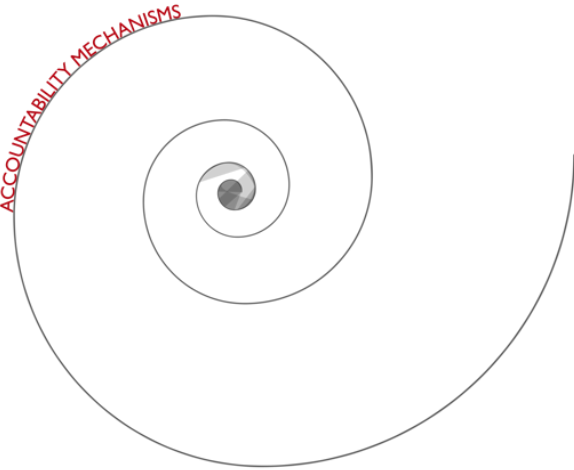| **Legal Counsel** |
|---|
| Support the Data Governance Board on interpretation of BC and Canadian legislation as directed by the Executive Data Steward / Chair. |
| Attend Board Meetings and other ad-hoc meetings as requested by the Executive Data Steward / Chair. |
| Develop legal instruments for the Nation with regards to its Data Governance requirements – e.g. Data Governance Agreements, Information Sharing Agreements, etc. |

3.0 Accountability Mechanisms

ACCOUNTABILITY MECHANISMS

The Data Governance Framework institutes accountabilities at all levels, Nation Leadership, Nation Managers, Staff, Data Stewards, Data Custodians, and external partners. We actively institute accountability mechanisms and ongoing efforts to ensure accountability to:

- Nation Members, regardless of where they live
- Individuals who receive services from our
  Nation but are not members of our Nation
- Nation Managers, including managers working in legal entities established by our
  Nation
- Nation partners

This following tables outline the mechanisms that will be used to provide evidence of accountability. It includes a descriptor and specifies the primary and secondary roles responsible for activating the mechanism.

3.1   Data Governance Resource Capacity

Mechanism: Data Governance Resource Capacity	
Provisioning resources, including human resources, to support the management of Nation Data and the Data Governance Framework; provisioning tools to support the management of Nation Data, including computer-based tools to store the data, security tools and building infrastructure to protect the data.	
Primary Responsibility: Nation Leadership	
Secondary Responsibility: Executive Data Steward / Chair and Nation managers	
Accountability Target	**Accountability Metrics**

Data Governance Operating Resources	• Annual budget allocation for:
	    o Board honouraria where required
	    o Meeting expenses
	    o Travel Expenses where required
	    o Support resources
	    o Training

Data Management Operating & Capital Resources	• Capital Infrastructure strategy and budget allocation for data storage and management • Ever-greening strategy and budget allocation for infrastructure assessment and renewals
Stewardship	• Full Stewardship representation o Incumbency record and participation levels for each of the four Data Stewards and the Executive Steward
Support	• Full support representation o Incumbency record and participation levels for Data Governance Subject Leads, Data Custodian, Administrative Support, Legal Support

3.2   Data Governance Skill Capacity

Mechanism: Data Governance Skills	
Human resource skill development and maintenance for the necessary skills to manage Nation Data and the Data Governance Framework.	
Primary Responsibility: Nation Leadership	
Secondary Responsibility: Executive Data Steward / Chair and Nation managers	
Accountability Target	Accountability Metrics
Data Governance	• Data Governance Orientation for all new Stewards and Support Resources (Custodians, Subject Leads, Administration support and Legal support) • Annual Data Governance training refresher • Record of Professional Development plan and efforts/events
Privacy & Security	• Annual Privacy & Security training and Policy overview session for Data Stewards and Data Custodian, and Nation Staff • Record of Professional Development efforts/events

3.3   Data Governance Board Proceedings

Mechanism: Data Governance Board Proceedings
Professional maintenance of Board duties and responsibilities.
Primary Responsibility: Executive Data Steward / Chair
Secondary Responsibility: Administrative Clerk

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Accountability Target	Accountability Metrics
Regular Meetings	• A minimum of nine (9) board meetings is to be held per year • Additional ad-hoc and focus meetings are to be held as needed • Record of special committee or Subject Lead ad-hoc meetings in support of Board
Process & Records	• A documented agenda, including the meeting date, time, attendees, and agenda topics to be developed and distributed one week prior to the meeting. • Regular maintenance of meeting Minutes. Amendments and approval of the minutes included in next meeting agenda. (Minutes are a summary, including statements of issues raised, important responses in summary form, and decisions. For privacy purposes and to present the Board in a united way the minutes will include the name of an individual only when absolutely necessary e.g. action item assignments.)
Reports	• The Data Governance Board will provide Quarterly Summary Reports to Nation Leadership • Annual report to Nation Leadership that provides an understanding of progress, successes, challenges, actions, and finances associated with implementing and maintaining the Data Governance Framework • Annual Nation open house / gathering to present the work of the Data Governance Board and any relevant successes and issues

3.4   Decision Ledger

Mechanism: Decision Ledger Matrix	
A ledger will be used to track decisions that affect the Data Governance Framework.	
Primary Responsibility: Executive Data Steward / Chair	
Secondary Responsibility: Administrative Clerk	
Accountability Target	Accountability Metrics
Decision Ledger	- The ledger will include: - Decision descriptor; - Name of the individual(s) responsible for making the decision; - Date the decision request was put forward; and - Decision outcome and date. - Conformance to Data Governance Decision Matrix

3.5 Decision Matrix

Mechanism: Decision Matrix
A formal Decision Matrix will be maintained and observed, that clearly delineates the decision authorities, assignments, and accountabilities.
Primary Responsibility: Executive Data Steward / Chair
Secondary Responsibility: Nation Leadership

Accountability Target	Accountability Metrics
Authorized	• Decision Matrix has been approved and authorized by Nation Leadership • Decision authority has been properly communicated, added into role description and/or job description

Alignment & Inclusivity	• Decision matrix aligned with / integrated into, the relevant policies and procedures, including the Data Governance Policies and the Privacy and Security Policies
	• Decision matrix reflected in decision ledger
	• The decision matrix will delineate at a minimum, the decision authorities and responsibilities with respect to the Data Governance Framework of:
	    o Nation Leadership
	    o Executive Data Steward / Chair
	    o Data Stewards
	    o Data Governance Board
	    o Data Custodian

3.6   Data Governance Implementation Plan

Mechanism: Data Governance Implementation Plan
Implementing the Data Governance Framework and assigning roles and responsibilities to respective roles and Staff will initiate accountability. However it is recognized that it will take time (e.g. 5+ years) for the framework to be fully implemented. Therefore an annual implementation plan will outline the current state and the goals for the subsequent year.
Primary Responsibility: Executive Data Steward / Chair
Secondary Responsibility: Data Governance Board

| Accountability Target	Accountability Metrics
Authorized	• The implementation plan has been approved and authorized by the Data Governance Board • The implementation plan has been provided to Nation Leadership
Inclusivity	The implementation plan will minimally include: • The annual strategic priorities • Key project and goals and outcomes • Human resource and budget requirements • Key risks and challenges, dependencies, project milestones, etc. • A summary review/evaluation of the implementation of the previous year's plan • High-level action plan

4.0 Data Governance Policy

The data governance policies describe specific requirements necessary to govern Nation data. They are used to inform and guide our implementation of the Data Governance Framework and the fulfillment of any related roles, responsibilities and accountabilities.; and provide our partners with a common understanding of our requirements. Each policy considers the vision and principles of our Data Governance Framework, and collectively they add strength to our protective blanketing of Nation data.

The goal of the Data Governance policies are to help prevent issues from developing by providing a common understanding of the application of data governance. Applying the policies will result in having a detailed understanding of the Nation's data by:

- Maintaining an inventory of all data and describing where it resides, including understanding how it is collected, used, and disclosed
- Classifying the sensitivity level of the data; defining data quality and data standard requirements
- Defining data disclosure, data sharing, and data linking requirements
- Outlining how we will monitor and assess compliancy with the Data Governance Framework and manage incidents
- Describing the approach to raising awareness of the Data Governance Framework
- Describing how changes can be supported and
- Providing a common set of definitions

The Data Governance policies are contained in a separate Data Governance Policy Manual as a separate contained document that can be more easily updated over time. Each policy describes the applicability, related factors, date approved, approver title and
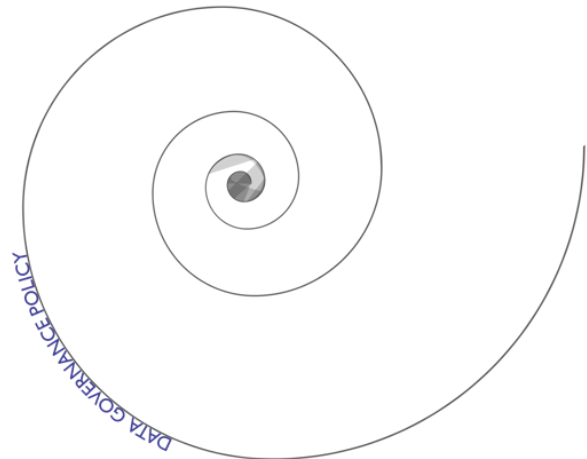
name, purpose, policy details, roles and responsibilities and where applicable supporting procedures. As/when a new policy is approved the manual will be updated to include the approved changes. The policies are developed by the Data Governance Board and approved by Nation Leadership.

5.0 Privacy and Security Policy

The privacy and security policies describe how Nation data will be protected and proper privacy and security measures and processes maintained to prevent privacy violations and inappropriate access. It considers applicable privacy legislation, integration with federal and provincial partners, and the unique needs of our Nation. They are used to inform and guide our Nation Leadership, Staff, and partners in the fulfillment of related roles, responsibilities and accountabilities; and provide Nation Members, clients, and customers with an understanding of how Nation data is protected. Combined with the other elements of the framework these Privacy and Security Policies provide more strength to the fibers of our protective blanket for Nation data.
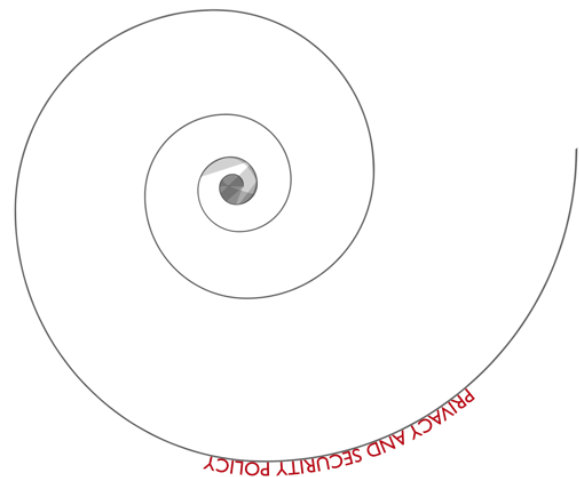
The goal of the Privacy and Security Policy manual is to help prevent issues from developing by providing a common understanding of how Nation data is to be protected. The policies describe:

- How access to Nation data is provided and managed; how to prevent unauthorized access; and how monitor compliancy
- How to protect against data loss or corruption
- Data retention and disposal requirements
- Clients/customers and partners awareness programs, including the consent model for collecting, using, disclosing human related information

The Privacy and Security Policy Manual is a separate manual. Each policy describes the applicability, related factors, date approved, approver title and name, purpose, policy details, roles and responsibilities and, where applicable, supporting procedures. As/when a new policy is approved the manual will be updated to include the approved changes. The policies are developed by the Data Governance Board and approved by Nation Leadership.

6.0   Legal Instruments

This section to be developed as part of working with the Demonstration Sites.
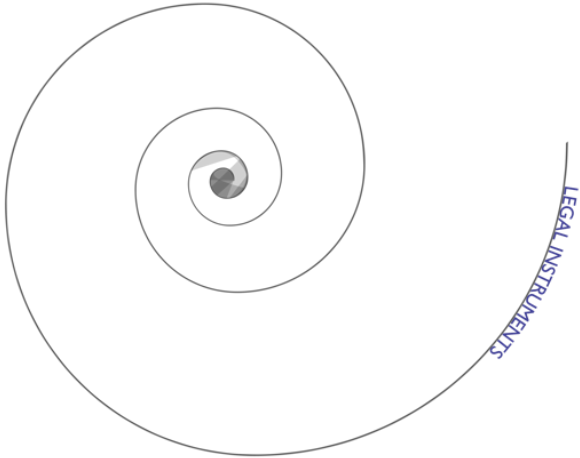
7.0   Definitions

The following table provides a list of terms and definitions that are used in context of the Data Governance Framework. This includes the framework document, Data Governance Policies, Privacy and Security Policies and any other related documents (e.g. Data Governance Agreements, Information Sharing Agreements, work products developed by the Data Governance Board members or support team members, etc.).

Term	Definition
Nation	The [Community/Communities] our Nation is directly affiliated with is: • [List the name of each Community/Village, include the registered name and other known names] [Tip: include only those Communities that you have a formal relationship with. Do not include names of Communities that may receive services from you but are not part of your official affiliation and service delivery models.]
Nation Data	Nation Data is data, information, and knowledge about or of our Nation, including our Nation, Nation Members, Lands, Resources, etc.. Human Related information belonging to our Members may become aggregated and become population-based nation data. Therefore Nation Data may include de-identified Human Related information. The term 'Nation Data' may be shortened to 'Data'.
Data Custodian	The role with accountability and responsibility for the physical and technical protection of the data but does not have Stewardship responsibilities. A Data Custodian does not "own" the information but instead is a "trusted agent" to secure it in its physical environment. This role also assesses security for the data that our Nation governs and is stored and/or managed by another Party.

Term	Definition
Data Disclosure	To release data, including reports, or to make data available to a different person or system other than the original person who collected the data
Data Governance	The 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.[3] It is a framework of oversight, decision-making, legislation, policies, procedures, protocols and practices that define the management of data to ensure it is protected and provides meaning and value to our Nation, Community/Communities, Members, clients/customers and partners regardless of where the data is stored.
Data Steward	The role that has legal and ethical accountability for the collection/use/disclosure, management, and overall protection of data stored within our Nation and data that our Nation governs and is stored in another Party's environment. A Data Steward does not "own" the information but instead is a "trusted agent and overseer" of the data. Taking care of this data is more than just protecting it – it requires being accountable for whatever actions are taken with the information. Those actions can include defining, creating, modifying, deleting, securing, ensuring its confidentiality, using it, and other data/information management activities.
Data Stewardship	Exercising accountability for and protection of, the data assets, and formalizing the roles and responsibilities to enable appropriate access and use of data. Stewardship is about responsibly caring for

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[3] Data Governance.com

Term	Definition
	information throughout its lifecycle to achieve maximum asset value from it. Stewardship also includes practicing responsible overall management and protecting Nation data in accordance with all relevant sets of ethical principles, standards, Nation policies and legal requirements.
Human Related data	The definition of Human Related information is as per the BC legislation 'Personal Information and Privacy Act', and the following bullets: • Staff name and contact information is Human Related information. • When Staff business contact information is disclosed outside of our Nation it must be our Nation's generic phone number and general business address. It cannot be the Staff's direct phone number or cell number. An Employee may choose to disclose their direct office number or cell number. When User IDs that are set up in another Party's information management systems the generic business contact information for our Nation must be provided; and the name of the Staff member being assigned the User ID may be disclosed however it is to be used by the other Party to track the work of the Staff member but is not to be disclosed outside of the Party's organization. The specific Staff contact information can be updated at any time within our information management systems and within another Party's systems. For follow-up of services and for traceability/auditing purposes the

Term	Definition
	Human Related information linked to a work product (e.g. legal name of the Employee who provided / supported the service) must be recorded and is considered Human Related Information. Inferred information about an individual is considered Human Related information. Human Related data is synonymous with the term 'Personal Information'.
Least Privilege and Need to Know	Providing a Staff member the ability to view, create, update, and/or delete data based in order to fulfill their roles and responsibilities assigned by the Nation (i.e. if the Staff are not required to view, create, update and/or delete data they are not provided the rights to do so).
Nation Member	An individual our Nation deems to be a member of our Nation. A Nation Member may or may not be a Registered Indian of Canada.
Nation Organization(s)	A legal entity owned or operated (partly or fully) by our Nation. This may be a corporation, non-profit society, partnership, etc.
Party or Other Party	A legal entity that is not owned by our Nation, or an individual that is not a Staff member of our Nation.
Staff	An employee or contractor of our Nation. This may include legal entities owned by our Nation.

Document Versioning

Date	Author	Version	Change Reference	Reviewed By
Mar 31 2015	Mustimuhw Information Solutions Inc.	V0 (Template)	Initial template document	n/a