



Australian Government

Department of Finance

Building Strong SES Accountabilities for Data

June 2026



Contents

Executive summary	4
Introduction	5
Goals and outcomes	6
Data leaders are empowered	6
Data is treated as an asset	7
Agencies are data-driven	7
Data literacy and capability are prioritised	7
Overarching principles	8
Role relationships and example descriptions	10
Relationships between roles	10
Chief Data Officer example role description	16
Overview	16
Relationship to other roles	17
Chief Data Officer accountabilities and responsibilities	17
Skills required	18
Performance	19
Senior Data Steward example role description	19
Overview	19
Relationship to other roles	19
Senior Data Steward accountabilities and responsibilities	20
Skills required	20
Performance	21
All SES Officers example role description	22
Overview	22
All SES Officers accountabilities and responsibilities	22
Skills required	22
Performance	23
Related accountabilities	23
APS Data governance groups	24
Internal governance	24
Whole-of-government governance groups	24
Data and Digital Ministers' Meeting	24
Secretaries Digital and Data Committee	24

Deputy Secretaries Data Group 25
Chief Data Officers Group 25

Executive summary

Government data is a valuable national asset that informs the policies, programs and services delivered by the Australian Government for the benefit of Australians.

When data is managed as an asset, its value will be maximised through greater use and reuse, both within and between government agencies and through data sharing and release. Government data custodians have fewer formal obligations and accountabilities than custodians of other government assets, except where agency-specific legislation applies. A principles-based approach to applying consistent SES accountabilities for data across the APS will help to address this gap, especially if the accountabilities are strong, consistent and well-understood.

This document outlines seven principles to strengthen SES accountabilities for data by guiding Australian Government agencies when establishing or reviewing their data governance arrangements. The principles, discussed in detail below, are that all:

1. agencies have a data strategy outlining how the agency will use data to meet its business objectives and priorities
2. agencies have a Chief Data Officer (CDO) (generally SES level) who is accountable for data across the agency, or assign accountability for data to a senior official with sufficient influence and support to drive the agency's data agenda
3. agencies have a Data Champion (generally the CDO)
4. agencies have an Indigenous Data Champion who could be the CDO if appropriate, noting guidance on position requirements in the Framework for the Governance of Indigenous Data is the primary consideration (see page 21).
5. agencies with significant data holdings have Senior Data Stewards (or equivalent roles) with accountability for data managed within specific data domains or business areas
6. SES officers have data accountabilities
7. agencies clearly define roles and responsibilities for data, using example role descriptions in this document as a guide.

This document also includes examples of SES data role descriptions and a discussion of how they interact with other SES roles.

Introduction

This document was commissioned by the Deputy Secretaries Data Group to promote better use of public data through strong, consistent and well-understood SES accountabilities for data.

Data is any information in a form capable of being communicated, analysed or processed (whether by an individual or by computer or other automated means).

Government data is a critical national asset. It informs the policies, programs and services delivered by the Australian Government for the benefit of Australian citizens. How the Government collects, manages, shares and uses data has a direct impact on the everyday lives of Australians, and the Government's ability to respond to emerging priorities and crises in a timely manner.

In 2020, the Australian Government's response to the Black Summer Bushfires and the COVID-19 pandemic highlighted the strategic importance of public sector data. These crises demonstrated the ability of the Australian Public Service (APS) to use data effectively and the value of the APS becoming a more data-driven organisation, but they also highlighted room for improvement.

In most agencies (non-corporate and corporate Commonwealth entities) data is not given the same level of attention or investment as other assets. Some agencies do not have comprehensive data asset registers and do not extract maximum value from their data holdings. Poorly defined roles and responsibilities for data can result in ad-hoc management and governance of data.

“Senior leaders of the APS must be held accountable for the quality of their data assets. ...Building a data-driven culture will require overcoming the culture of risk aversion and legislative barriers that prevail in the APS” (Independent Review of the Australian Public Service (2019)).

A principles-based approach to consistent SES accountabilities for data across Commonwealth government agencies will promote better use of data and ensure data is treated and valued like other national assets. Stronger accountabilities will contribute to increased public trust through improved transparency in how government collects and uses data, and better appreciation of its public benefits. The Australian Government's response to the COVID-19 crisis showed community support for government data use is stronger when the benefits to the public are clear.

This document assists agencies by providing guiding principles regarding the roles of SES and equivalent officers in improving data accountabilities. The principles are designed to be flexible and scalable to suit different agencies. This document builds upon the [Foundational Four](#), released by the Office of the National Data Commissioner (ONDC) in 2020, which sets out four pillars for good data governance.

SES officers in data roles are encouraged to engage with the [APS Data Professional Stream](#) to maximise their effectiveness and to promote opportunities for all SES officers to develop data literacy.

All APS agencies are encouraged to apply the principles and accountabilities in this document.

Accountability rests with the person ultimately required to justify decisions and actions in relation to a given issue. Accountability cannot be shared or delegated.

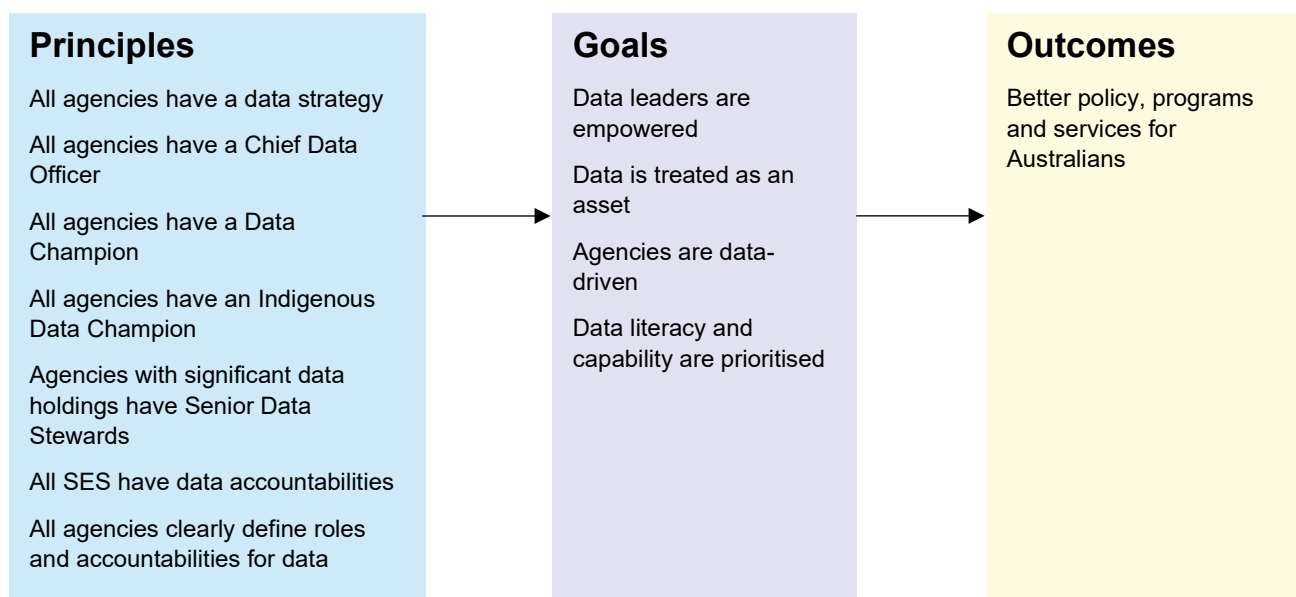
Responsibility rests with the person or people required to make a decision or perform an action. Responsibility may be shared or delegated.

Goals and outcomes

Implementing the SES accountabilities for data outlined in this document will assist agencies to empower their data leaders, treat data as an asset, make data-driven decisions and build appropriate data literacy and capability. Achieving these goals will give agencies greater oversight of their data holdings, enabling more effective, efficient, economical and ethical management of data, and leading to better policy, programs and services for Australians. This will be a multi-year journey which agencies must undertake at their own pace. Support is available through the [APS Data Professional Stream](#) and the Data Champions Network.

Figure 1 illustrates the theory of change achieved when the principles in this document are implemented.

Figure 1 – Theory of change



Data leaders are empowered

All agencies will have a CDO or assign accountability for data to a senior official with sufficient influence and support to drive the agency’s data agenda. The CDO will lead development and implementation of the agency’s information architecture and data strategy. The agency head and executive board will strongly endorse the strategy and ensure the CDO is adequately resourced to support its implementation.

Clear delineation of accountabilities between related roles (e.g. CDO and CIO) is required to allow agencies to better target budget allocations and empower each role to best support agency outcomes.

Data is treated as an asset

All agencies will manage data as a government asset, maximising its value through greater use and reuse. Agencies will embrace data sharing and prioritise the release of non-sensitive data as open by default, in line with the Government's commitment in the [Data and Digital Government Strategy](#).

Agencies will maintain comprehensive data inventories, enabling better understanding of the value of its data holdings and enhance the quality of its data and metadata. Agency governance and management will be appropriate having regard to the volume, sensitivity and complexity of its data holdings.

Agencies are data-driven

Improvements to data governance, management, literacy and capability will enable agencies to make truly data-driven decisions. Where appropriate, this could include increased use of automation technologies, such as artificial intelligence and machine learning, without compromising ethics, privacy or security. Transparency and clear linkages between data collection and outcomes for the public will promote trust in government data use, increasing willingness to provide data to government.

Data literacy and capability are prioritised

All agencies will invest in data literacy and capability by training existing staff, recruiting appropriately skilled data professionals, and leveraging the APS Data Professional Stream. Over time this will raise base data literacy across the APS. Agency investments in data capability should be proportionate to the value of its data assets and prioritised alongside investment in all other agency assets, such as people and information and communication technology.

Overarching principles

Agencies are encouraged to adopt the following principles when establishing or reviewing data governance arrangements.

1. All agencies have a data strategy outlining how the agency will use data to meet its business objectives and priorities

A data strategy is a detailed plan for an agency's collection, management and use of data to support the agency in achieving its business objectives and priorities. A data strategy should outline the current state of the agency's data, and what, how, when and why it will change. The data strategy should include clear links to the agency's corporate plan.

“A well-rounded Data Strategy should consider all data processes, what is required at each step of those processes and where improvements need to be made and efforts focused. It may also consider other measures, such as skills and capability building, and cultural change activities. Ideally, all agency data would be within scope of a Data Strategy” ([Foundational Four](#)).

When developing a data strategy, agencies should consider the time, resources and technology required to achieve desired changes, as well as the strategy's internal and external facing components. For example, external facing components may include how the agency's collection, management and use of data creates benefits for Australians.

2. All agencies have a Chief Data Officer (generally SES level) accountable for data across the agency, or assign accountability for data to a senior official with sufficient influence and support to drive the agency's data agenda

Assigning accountability for enterprise-wide data governance and oversight of the agency's data use to a suitably senior member of the leadership team will enable an agency to manage data similar to its other assets. The CDO should ideally be a standalone SES role, especially in agencies with significant data holdings. In smaller agencies (up to 250 employees) and those with few SES officers it may be appropriate to assign accountabilities for data to another existing SES role. In especially small agencies, it may be appropriate for the CDO to be Executive Level 2 (or equivalent).

Refer to the [Chief Data Officer](#) example role description for guidance on CDO accountabilities.

3. All agencies have a Data Champion (generally the CDO)

Data Champions support an agency to implement best practice use, sharing and re-use of data within the agency and across the APS. This is a leadership role best suited to SES officers—generally the CDO.

The Data Champions Network (DCN) is a whole-of-government group for sharing information, showcasing best data practices across the APS, and providing a communication channel for data related matters. Agencies seeking to join the DCN should contact the [Data Champions Secretariat](#) for more information.

Refer to the [Chief Data Officer](#) example role description for guidance on Data Champion accountabilities.

4. All agencies have an Indigenous Data Champion

A key action under the Framework for Governance of Indigenous Data (GID) is for each agency to establish an Indigenous Data Champion. The Indigenous Data Champion could be the CDO if appropriate, noting guidance on position requirements in the GID is the primary consideration (see page 21). Indigenous Data Champions provide guidance and support in the governance and management of Indigenous data assets. This champion should have the appropriate authority and support to influence the work of the agency and would preferably be an Aboriginal or Torres Strait Islander staff at executive level. If an Aboriginal or Torres Strait Islander staff member is not currently available, upskilling and recruiting should be a priority for this role, so that it can be held by an Aboriginal or Torres Strait Islander person.

Further guidance on this role can be found in the GID and the Australian Government Data Governance Framework.

5. Agencies with significant data holdings have Senior Data Stewards (or equivalent roles) with accountability for data managed within specific data domains or business areas

Senior Data Stewards facilitate effective day-to-day management of data collected and held by an agency within defined data domains or business areas, manage data quality, privacy, safe access, sharing and usage arrangements, and proactively manage data risks. Data stewards manage data assets on behalf of others and in the best interests of their agency.

Agencies with significant data holdings may benefit from implementing senior accountability for data stewardship, overseeing business data stewards within data domains or business units. In agencies with lower volume and complexity of data, the Senior Data Steward function may be part of the CDO role.

Refer to the [Senior Data Steward](#) example role description for guidance on accountabilities.

6. All SES officers have data accountabilities

All SES officers are accountable for proper use of government data within their areas of business responsibility, in accordance with the agency's data governance framework, and for supporting efforts to build their agency's data capabilities.

7. All agencies clearly define roles and accountabilities for data, using the example role descriptions in this document as a guide

Using the example role descriptions in this document as a guide for senior data roles will increase consistency of data governance across the APS and contribute to the management of data as an asset, similar to other government assets.

The [APS Data Professional Stream](#) can help agencies build data capability, including the data leadership skills and capabilities outlined in this document.

Role relationships and example descriptions

The example SES data role descriptions outlined below are intended to guide agencies when establishing or updating data governance arrangements. The example role descriptions are designed to be flexible and scalable to suit different agencies. Not all functions under a role description must be performed by the same person; it may be appropriate for any agency to assign functions to a range of existing roles or to delegate certain responsibilities. For example, an agency's CDO may delegate Data Champion responsibilities (but not accountabilities).

Delegation of responsibility will vary between agencies, based on the nature of the agency's data, structure, level of resourcing and risk appetite. For example, an agency that deals primarily with sensitive data may retain responsibility at a higher level than an agency that deals primarily with non-sensitive data.

Figure 2 provides a general guide to the SES levels at which accountabilities for data should exist in most APS agencies.

Figure 2 – Suggested SES levels for data roles

	Chief Data Officer	Data Champion*	Indigenous Data Champion*	Senior data stewards	All SES officers
SES B3	No	No	No	No	Yes
SES B2	Yes	Yes	Yes	Yes	Yes
SES B1	Yes	Yes	Yes	Yes	Yes

*Agencies can choose to make the Data Champion and Indigenous Data Champion part of the Chief Data Officer role noting that it can also be delegated.

Relationships between roles

Clear and effective engagement between related roles within agencies is critical to achieve business outcomes. Roles related to data include:

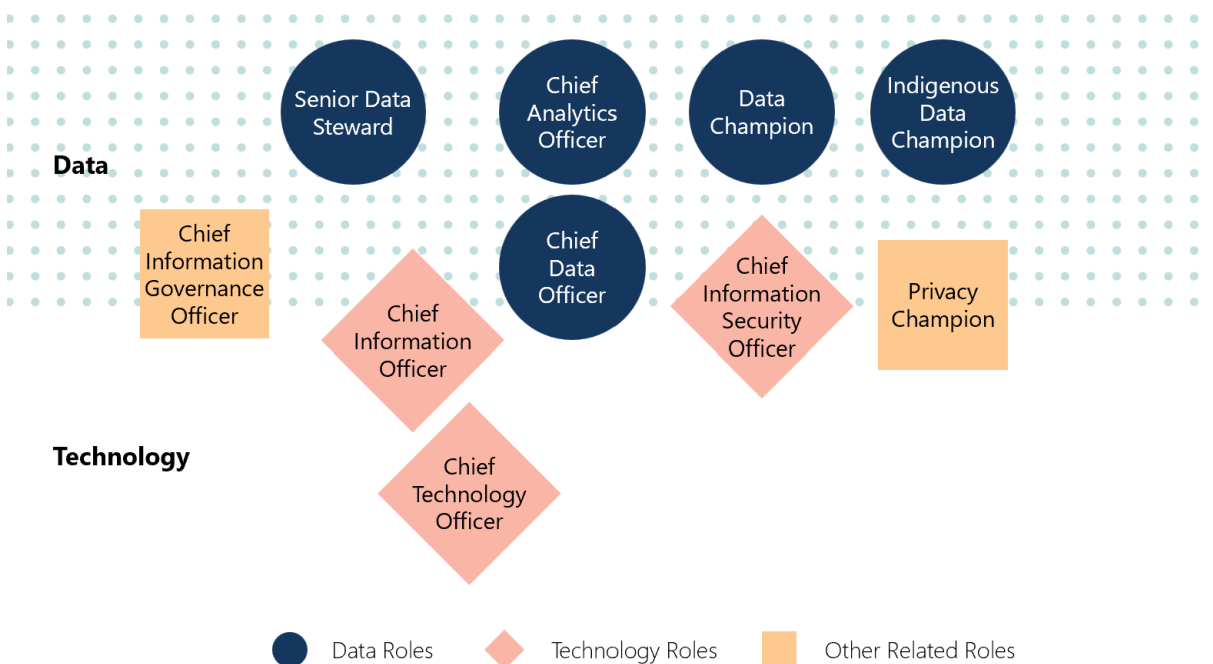
- **Chief Data Officer (CDO)** – accountable for enterprise-wide governance and use of data as an asset within an agency, and building agency data capabilities
- **Data Champion** – promotes best practice use, sharing and re-use of data within their agency and across the APS
- **Indigenous Data Champion** – provides guidance and support in the governance and management of Indigenous data assets
- **Chief Analytics Officer** – oversees an agency's analytics function, including data analytics and data science
- **Chief Information Officer (CIO)** – oversees the inward view of technology in an agency
- **Chief Technology Officer (CTO)** – oversees the outward view of technology in an agency
- **Chief Information Governance Officer (CIGO)** – establishes and maintains an enterprise-wide culture for an accountable and business-focused information management environment. Often performed by CDO or CIO
- **Chief Information Security Officer (CISO)** – ensures the alignment of an agency's cyber security and business objectives
- **Privacy Champion** – promotes a culture of privacy that values and protects personal information within an agency

- **Senior Data Steward (aka Domain Data Steward)** – oversees day-to-day management of data collected and held by an agency within a defined data domain or business area
- **Data Champion** – promotes best practice use, sharing and re-use of data within their agency and across the APS.

It is important to clearly define where the accountabilities and responsibilities of each role start and end to avoid gaps and overlaps between related roles. Agencies should assess the most appropriate SES level of each role given their assigned accountabilities and responsibilities and avoid power imbalance between roles. Budget allocations should be aligned with accountabilities.

Figure 3 shows the overlaps in responsibility between data and technology roles. Roles with overlapping responsibilities should work together to ensure synergy between the agency’s data and technology operations.

Figure 3 – Data and technology responsibilities



While a CDO is not responsible for an agency’s technology platforms, it is important they work with their CIO and CTO to ensure that technology platforms meet the agency’s data needs. To support a balanced approach to data and technology, it is often beneficial for the CDO to be the same SES level as the CIO.

The CDO should also work with the CTO, if applicable, to ensure digitalisation of business processes accounts for the agency’s data needs, while ensuring data aligns with business needs.

Many agencies assign CDO and CIGO responsibilities to the same SES officer, which is consistent with the [National Archives of Australia’s guidance on implementing a CIGO role](#). If the CDO is not the CIGO, the two should work together to ensure data governance and broader information and records governance arrangements are consistent.

While it is important for related roles to work together, it is also important to maintain separation of duties between certain functions. For example, the Privacy Champion should be separate from any roles with accountability for collection and use of data. Likewise, separation of duties can improve data protection by providing additional layers to detect security breaches and fraud. Agencies should ensure individuals do not have conflicting responsibilities and are not responsible for reporting on themselves or their superiors.

Figure 4 (overleaf) illustrates which roles are Responsible, Accountable, Supporting, Consulted and Informed for each outcome of this Principles-based Approach to SES accountabilities for data:

- **Responsible** – person or people required to make a decision or take action (may delegate to others)
- **Accountable** – person ultimately required to justify decisions and actions
- **Supporting** – people who help complete a task, often lending resources to those responsible
- **Consulted** – people whose opinions are sought as subject matter experts or stakeholders (two-way communication)
- **Informed** – people who are advised of progress or completion, but do not have input (one-way communication).

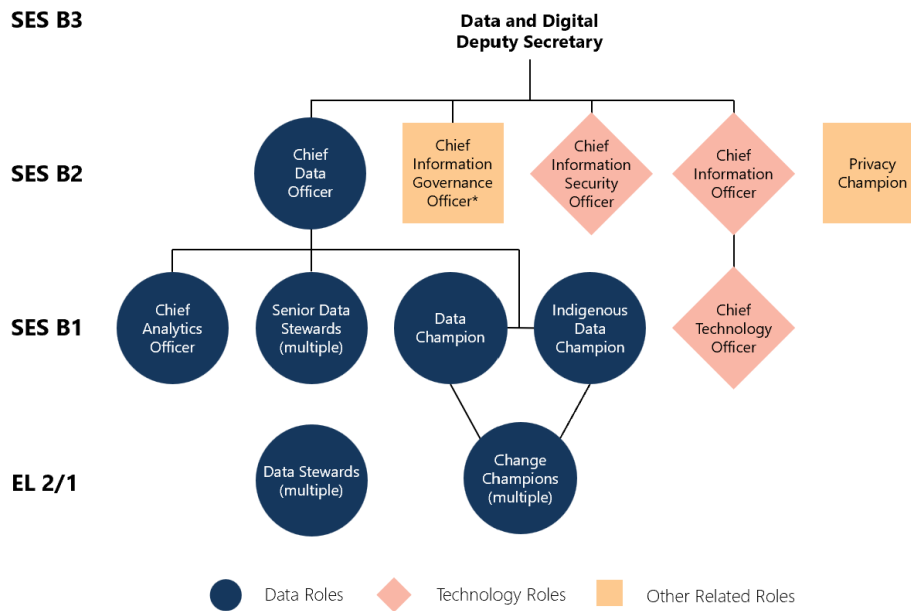
Figure 4 – RASCI Matrix

	Chief Data Officer	Chief Analytics Officer	Chief Information Officer	Chief Technology Officer	Chief Information Security Officer	Chief Information Governance Officer	Chief Digital Officer	Privacy Champion	Senior Data Stewards	Data Champion	Indigenous Data Champion	Policy / Program Delivery
Information architecture	A	S	R	R	S	R	S	C	S	S	S	I
Data strategy and roadmap	A	S	C	C	C	C	C	C	S	S	S	I
Data governance	A	S	C	C	R	R	C	C	S	R	R	I
Data management	R	R	S	S	S	R	S		A	R	R	R
Value realisation – data as an asset	A	S							S	S	S	
Develop enterprise data and analytics platform	R	S	A	R	C	S	R	I	S	S	S	I
Business system development	S	S	A	R	C	C	R	I	C	C	I	R
System maintenance	C	C	A	R	C	I	I		C			I
Data on business systems	A	R	R	R	R	R	R	I	R	S	S	R
Data acquisition	S	R	S	S	I	A		I	R	S	S	R
Data inventory / asset register	A	S	I	I	R	S	I	I	R	S	S	S
Data storage	S	I	A	R	C	C	C		R	I	I	R
Data protection (security)	R	C	R	R	A	R	C	R	R	C	C	I
Data quality	S	R			R	S			A	R	R	R
Data use	S	A				S	I	I	R	S	S	R
Trust and ensuring data use is ethical	A	R			R	R		R	R	R	R	S
Data release (open data)	A	S			I	S		C	R	S	S	R

	Chief Data Officer	Chief Analytics Officer	Chief Information Officer	Chief Technology Officer	Chief Information Security Officer	Chief Information Governance Officer	Chief Digital Officer	Privacy Champion	Senior Data Stewards	Data Champion	Indigenous Data Champion	Policy / Program Delivery
Data sharing	A	S			S	S		C	R	S	S	R
Archival and disposal of data	S	S	I	I	I	A	I		R		I	S
Data capability and literacy – continual improvement	A	R			S	R			R	R	R	S
Enterprise data risk (non-security)	A	S	I	I	R	R	I	I	S	S	S	C
Operational data risk	S	R	I	I	C	S	I	I	A	S	S	R
Indigenous data management	R	R					R	R	R	R	R	R

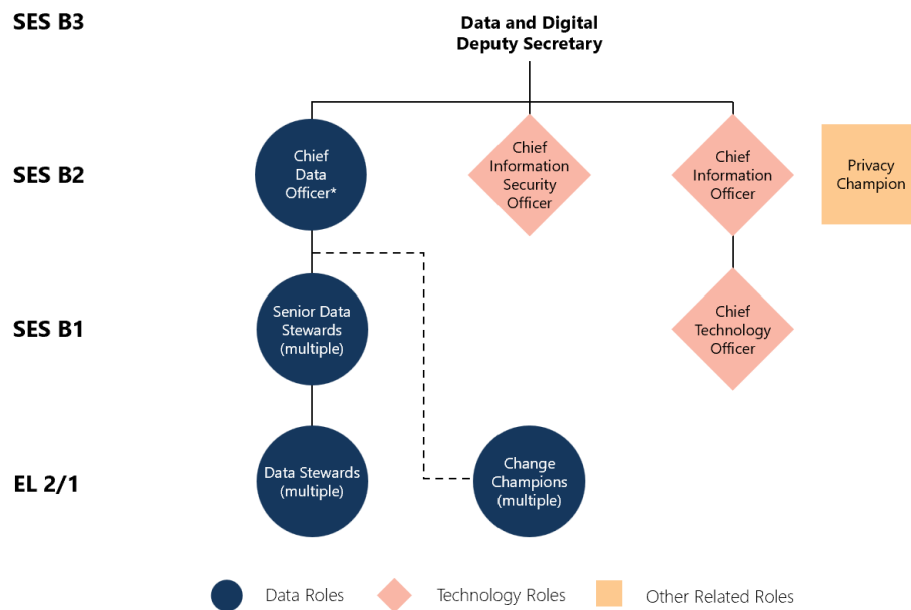
Figures 5-7 show example reporting structures for data and digital SES roles in large (1,000+ employees), medium (250-1,000 employees) and small agencies (<250 employees). Each agency should set accountabilities appropriate to its unique circumstances, having regard to the guidance in this document.

Figure 5 - Example reporting structure for large agencies (1,000+ employees)



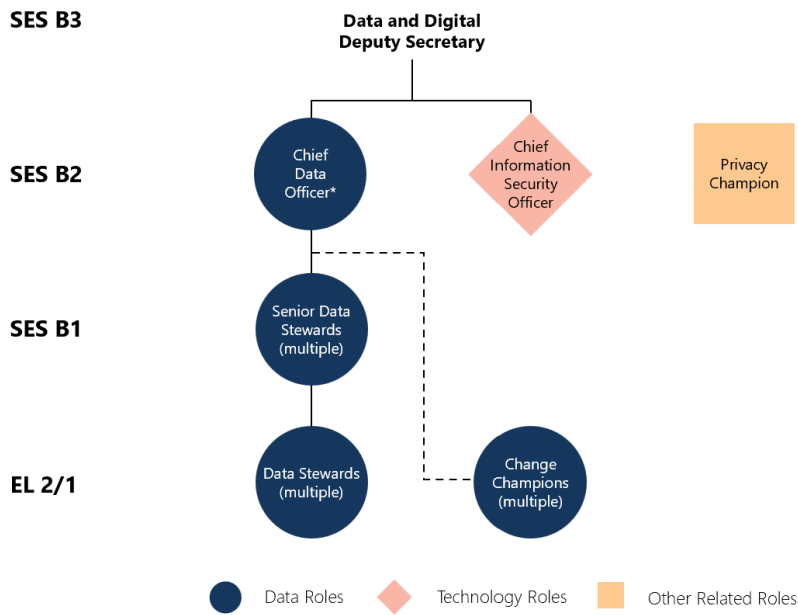
* The Chief Information Governance Officer may be the Chief Data Officer, Chief Information Officer or Chief Information Security Officer in many agencies.

Figure 6 - Example reporting structure for medium agencies (250-1,000 employees)



*The Chief Data Officer may include the Data Champion and Indigenous Data Champion roles, which can be delegated

Figure 7 - Example reporting structure for small agencies (<250 employees)



*The Chief Data Officer may include the Data Champion and Indigenous Data Champion roles, which can be delegated

Chief Data Officer example role description

Overview

All agencies should identify a senior leader (in most cases SES level) who is accountable for enterprise-wide governance and use of data as an asset within an agency. Ideally, this will be separate to other digital and technology roles in agencies with significant data holdings. In smaller agencies (less than 250 employees) and those with few SES officers it may be appropriate to assign responsibilities and accountabilities for data to existing identified roles. The [Foundational Four](#) suggests it may be appropriate to assign responsibilities to the senior executive responsible for one or more of the following:

- information services
- data analytics
- digital strategy
- data management
- Privacy Champion and/or Privacy Officer (Australian Government Agencies Privacy Code)
- Chief Information Governance Officer (Digital Continuity 2020).

In some instances, it may be effective for an SES officer in a policy role to take on accountabilities for data and transition to a formal data leadership role as the agency's data maturity grows.

The appropriate level for a CDO varies between agencies. In agencies with smaller data holdings the CDO may be a lower level than in agencies with significant data holdings. In very small agencies (e.g. with only one data team) it may be appropriate for the CDO to be at the EL2 level. It may be appropriate to align the level of the CDO with similarly resourced SES roles within an agency.

The level at which a CDO sits within an agency should be commensurate with the volume and complexity of the agency's data holdings. In a data driven agency, the CDO should have the same stake in business decisions as SES responsible for other assets affecting business outcomes (e.g. CIO and CFO).

Regardless of the CDO's level within the agency, it is important the CDO is properly resourced to perform their defined role. Ideally this should include the actions outlined in this document.

It is not essential for all data teams to be in the CDO's direct reporting line, but the CDO should have oversight of all data activities within their agency. A CDO should be able to identify, measure and communicate the tangible business outcomes achieved through changes in an agency's use and management of its data.

Agencies undertaking high volume or highly complex data analysis should consider having a separate chief analytics officer or chief data scientist with accountability for data analytics and data science. However, in most agencies this can be part of the CDO's role.

CDOs are encouraged to participate in the Data Champions Network. Data Champions are responsible for promoting best practice use, sharing and re-use of data within their agency and across the APS. The role may be delegated to other SES.

Relationship to other roles

The CDO should have oversight of all other SES data roles in the agency, whether through direct reporting lines or only for specific responsibilities. The CDO should leverage (EL or equivalent) change champions in business areas across the agency to support cultural change. The CDO should not be part of an agency's information technology unit, but should work with the agency's CIO to ensure that technology platforms meet the agency's data needs. The relationship between the roles should be a partnership, rather than a direct reporting line. The CDO cannot be accountable for actions and risks outside their authority, so it may be necessary to adjust the responsibilities of other SES roles to empower the CDO.

Chief Data Officer accountabilities and responsibilities

Action	Accountable/ Responsible	Can delegate responsibility
Foster the creation of a data-driven culture that harnesses the value of enterprise data assets to inform decision-making	Yes	No
Build and maintain positive relationships with the agency's other senior leaders, and promote opportunities for data to improve business outcomes	Yes	No
Work with other senior leaders to ensure data security and protection, including safe storage and confidentiality	Yes	No
Build capability of other CDOs (e.g. participate in cross-agency recruitment panels, mentor new CDOs, share knowledge)	Yes	No
Manage the agency's enterprise data costs in line with budget allocations	Yes	Yes
Lead development, publishing and maintenance of the agency's information architecture	Yes	Yes
Lead development and implementation of the agency's data strategy	Yes	Yes
Lead development and continuous improvement of the agency's enterprise data governance framework ¹	Yes	Yes
Oversee and coordinate data architecture and business intelligence	Yes	Yes
Maintain an inventory of all data assets held by the agency, including on which basis they can be shared or open	Yes	Yes
Oversee development and deployment of the agency's enterprise data and analytics platform, if applicable	Yes	Yes
Build and maintain the agency's data literacy and specialist capabilities, including analytics	Yes	Yes
Set the standards and approach to data management and quality, including shared and open data	Yes	Yes
Support staff who work with and manage data, including assisting business areas to source external data	Yes	Yes
Establish an ethical framework for the agency's collection and use of data, including use of artificial intelligence and other automation technologies. Data ethics includes ensuring data collection and use are transparent, purposeful and in the public interest, upholding privacy, security and legality, and applying human supervision to automation technologies	Yes	Yes
Build and maintain public trust in the agency's use of data	Yes	Yes
Ensure compliance with relevant legislation and information management policies	Yes	Yes
Ensure data is appropriately considered in agency business continuity and disaster recovery plans, and participate in crisis simulations and disaster stress testing	Yes	Yes
Manage enterprise level data-related risks and issues in line with the agency's risk management policy	Yes	Yes
Support professional data capability uplift across the APS	Yes	Yes

¹ A data strategy details how an agency will use data to meet its broader business objectives and priorities, whereas a data governance framework defines oversight mechanisms to formalise accountabilities and responsibilities for management of the agency's data.

Action	Accountable/ Responsible	Can delegate responsibility
Promote the release of data held by the agency as open by default, prioritising high value data, and remove barriers to data sharing and release of non-sensitive data	Yes	Yes
Oversee agency's analytics function, including data analytics and data science	Yes	Yes
As Data Champion, promote use, sharing and re-use of data across the APS	Yes	Yes
As Data Champion, promote and/or implement innovative data related initiatives within their agency and the APS, including advising business areas about how data can be used to support policy proposals before they are presented to Cabinet	Yes	Yes
As Data Champion, provide input to the Data Champions Executive group regarding potential opportunities to collaborate across the APS on common data collection, management and use issues, as well as opportunities to improve APS data workforce capabilities and data literacy	Yes	Yes
As Data Champion, establish and maintain a network of change agents across the agency	Yes	Yes
If also Indigenous Data Champion, provide guidance and support in the governance and management of Indigenous data assets.	Yes	Yes
If also Indigenous Data Champion, establish, enhance and drive capability and capacity to implement the GID Framework.	Yes	Yes

Skills required

The CDO role is primarily a leadership role. While it is not a technical role, it is important for a CDO to have an understanding of data management and analytics practices, information technology platforms and the software development lifecycle. Key skills required by a CDO include:

- **Leadership** – a CDO should be highly visible within the agency and have the ability to influence peers and subordinates to modify behaviours and adopt data governance policies. The CDO will ensure data practices and data governance arrangements of the agency support delivery of its corporate plan. They should be able to empower data users. A CDO should be a credible source of information about the agency's data holdings and activities
- **Strategic thinking** – a CDO should be able to develop data strategies addressing both short and long term business priorities of the agency, while being responsive to change. This includes developing and communicating a clear vision for the future of the agency's data capabilities
- **Business focussed** – a CDO should understand the business of the agency and how data contributes to and enables business outcomes. This includes an in-depth knowledge of the agency's data architecture, key data holdings and platforms, and interagency data policy frameworks and infrastructure
- **Communication** – a CDO should have the ability to communicate with people at all levels. This includes the ability to communicate complex data issues in simple language to a non-technical audience
- **Data management** – a CDO should have a good understanding of best practice data management. They also require awareness of the security, privacy, ethics and quality requirements for data, and some familiarity with data analysis techniques
- **Industry knowledge** – a CDO should be familiar with the latest trends in data management practices, analytics, integration and associated technological advancements. This also extends to what is happening across government and public expectations of government data use
- **Risk management** – a CDO should have a good understanding of and ability to apply risk management concepts and the agency's risk management policy.

Performance

Performance agreements for CDOs should focus on the maturity of the agency's data governance and data literacy, public sentiment towards the agency's collection and use of data (trust), and business outcomes achieved through changes in the agency's use and management of data.

Senior Data Steward example role description

Overview

In general, a senior data steward maintains responsibility within a defined data domain or business area for oversight of the day-to-day management of data collected and held by an agency, manages data quality, privacy, safe access, ethical sharing and usage, and proactively manages data risks. Data stewards manage data assets on behalf of others and in the best interests of their agency. Agencies with significant (high volume or complex) data holdings should consider implementing senior data stewards with accountability for overseeing business data stewards within their reporting lines.

Senior data stewards are also accountable for data sharing and release of open data within their defined data domains or business areas, with a focus on high value, high quality data. Some agencies may choose to have a separate open data champion role working across all of the agency's data domains.

A senior data steward should generally sit within the business area where the relevant data is managed. While a senior data steward may not report directly to the CDO, they should work closely together to ensure consistent management of data across the agency. In general, a senior data steward should not be a higher level than the CDO.

Relationship to other roles

Senior data stewards should engage with other senior data stewards in the agency to ensure the best practice data management standards set by the CDO are consistently applied, and work closely with the CDO and any business data stewards.

Senior Data Steward accountabilities and responsibilities

Action	Accountable/ Responsible	Can delegate responsibility
Nominate and support business data stewards for data assets within defined data domains or business areas	Yes	No
Ensure proactive management of data risks, including risk associated with data sharing and release of open data and escalate risks and issues to the CDO where necessary	Yes	No
Approve acquisition, use, sharing and release of data from a business perspective	Yes	Yes
Ensure data assets are managed in the best interests of the agency and align with the agency's data governance and ethics frameworks	Yes	Yes
Facilitate effective day-to-day management of data collected and held by the agency within defined data domains or business areas	Yes	Yes
Ensure data within defined data domains or business areas is recorded in the data inventory / asset register	Yes	Yes
Ensure data quality, privacy, safe access, discoverability, ethical sharing and usage arrangements, including use of appropriate metadata	Yes	Yes
Engage with external data users to understand what data is most useful for sharing and release as open data	Yes	Yes
Engage with internal data users to improve data for policy, programs and services	Yes	Yes
Allocate resources to the release of high value non-sensitive data	Yes	Yes
Support staff who work with and manage data to release that data, and provide advice on de-identification	Yes	Yes
Approve retention, archival and disposal of data in accordance with legislation and records authorities	Yes	Yes
Build professional data steward capabilities within the agency	Yes	Yes
Support data stewardship capability uplift across the APS	Yes	Yes

Skills required

Senior data stewards require at least some technical understanding of data and analytics practices and data platforms. The primary skills required include:

- **Data management** – a senior data steward should have a good understanding of the agency's data governance framework and best practice data management. This includes awareness of the security, privacy, ethics and quality requirements for data, and familiarity with data analysis techniques. They should be familiar with data business processes
- **Project management** – a senior data steward should have project management skills to guide data projects
- **Business focussed** – a senior data steward should understand the business of the agency and how data contributes to and enables business outcomes. This includes an in-depth knowledge of the agency's data architecture, key data holdings and platforms, and interagency data policy frameworks and infrastructure
- **User focussed** – a senior data steward should be knowledgeable about the data held by the agency and understand who the existing and potential external users are and what data is most useful to those users
- **Communication** – a senior data steward should have the ability to communicate with people at all levels. This includes the ability to communicate complex data issues in simple language to a non-technical audience

- **Risk management** – a senior data steward should have a good understanding of and ability to apply risk management concepts and the agency’s risk management policy.

Performance

Performance agreements for senior data stewards may measure impact on data quality, privacy and security, and business outcomes supported by the senior data steward’s data domain or business area. With regard to shared and open data, metrics should focus on the quality and usefulness of data shared and released by the agency, the timeliness of data sharing and release, and how well the agency is meeting demand for data (e.g. fulfilling requests for non-sensitive data to be made open). Metrics should avoid measuring the volume of data shared and released, other than how well demand is being met. Performance agreements could also include the number of breaches resulting from the release of sensitive or identifiable data.

All SES Officers example role description

Overview

All SES officers (and equivalent), including those acting in SES roles, must meet performance standards based on the Integrated Leadership System. Accountabilities and responsibilities for data can be extrapolated from these performance standards. Broadly, this includes ensuring proper use of government data and supporting efforts to build APS data capabilities. All SES are encouraged to champion the role of data within their agency.

All SES Officers accountabilities and responsibilities

Action	Accountable/ Responsible	Can delegate responsibility
Maintain awareness of all data under management and have appropriate protections in place	Yes	No
Support implementation of cultural change led by SES officers in data roles and actively ensure stakeholders are kept informed during times of change	Yes	No
Support implementation of good data practices across the agency consistent with whole of government guidance such as the Data Ethics Framework and Framework for the Governance of Indigenous Data	Yes	No
Build and sustain relationships with senior data leaders within the organisation	Yes	No
Encourage and motivate people to engage in continuous learning to increase baseline data skills	Yes	No
Value data as an asset and invest in good management and use	Yes	Yes
Use quality data to inform decisions	Yes	Yes
Identify and address gaps in data collection and quality	Yes	Yes
Ensure business areas within their reporting lines comply with data governance arrangements	Yes	Yes
Manage risks to data assets in accordance with the agency's risk management policy	Yes	Yes
Ensure data sharing and access arrangements are appropriate to provide safe data sharing and in line with legislative obligations and the agency's data governance framework	Yes	Yes
Appropriately resource teams to integrate data professional expertise to improve overall performance and delivery of business unit outcomes, and engage in succession planning	Yes	Yes
Facilitate cooperation within and between organisations and promote the reciprocal sharing of data to build skills, experience and knowledge	Yes	Yes

Skills required

- **Leadership** – all SES officers should have the ability to influence peers and subordinates to modify behaviours and adopt data governance policies. They should empower data users
- **Strategic thinking** – all SES officers should have the ability to develop business plans for data collection and use to address both current and anticipated future requirements, and align business activities with strategic priorities
- **Business focussed** – all SES officers should have a good understanding of the key data assets within their reporting lines and how they contribute to the agency's business outcomes
- **Communication** – all SES officers should have sufficient understanding of data governance and data holdings to communicate with people at all levels about the use of data

- **Data literacy** – all SES officers should have foundational data literacy, including awareness of security, privacy, ethics and quality requirements
- **Risk management** – all SES officers should have a good understanding of and ability to apply risk management concepts and the agency's risk management policy.

Performance

Performance agreements for all SES officers could include completing basic data learning and development courses to achieve baseline data literacy, and the management of key data assets within their reporting lines (e.g. compliance with data governance, data sharing, open data, and data privacy breaches).

Related accountabilities

Existing non-data accountabilities may affect the management of data. For example, the:

- financial accountabilities derived from the *Public Governance, Performance and Accountability Act 2013* apply to the procurement of data
- *Australian Government Charging Framework* applies where a fee is charged for access to data
- *Privacy (Australian Government Agencies — Governance) APP Code 2017*, made under the *Privacy Act 1988*, assigns responsibilities to agencies to comply with the *Australian Privacy Principles*, enhance privacy capability and accountability, promote good privacy governance, and build community trust and confidence in the personal information handling practices of agencies. The code requires agencies to have a designated SES level Privacy Champion to ensure specific functions are carried out and a designated Privacy Officer
- *Protective Security Policy Framework* outlines agency accountabilities for information security, including a requirement to comply with the *Information Security Manual*
- *Archives Act 1983* outlines accountabilities for the management of records, including data records
- *Freedom of Information Act 1982* includes accountabilities for the release of data in certain circumstances
- *National Statement on Ethical Conduct in Human Research* consists of ethical guidelines for research involving human participants, including ethical collection and use of data, but is only mandatory for research funded by the National Health and Medical Research Council (NHMRC).
- *National Agreement on Closing the Gap* assigns responsibilities to change the way governments work with Aboriginal and Torres Strait Islander people to overcome the inequality experienced by Aboriginal and Torres Strait Islander people, and achieve life outcomes equal to all Australians.

APS Data governance groups

Internal governance

Agencies dealing with large volumes of data should consider establishing a senior data governance group, led by the CDO and with representatives from business areas with responsibility for significant data holdings. All agencies should identify data governance trigger points and embed data into appropriate senior governance groups, such as those dealing with digital transformation, privacy, information security, information (records) management, business continuity, disaster recovery, and other groups making decisions that could affect the agency's data use. It is also beneficial for a data representative to participate in an agency's senior ICT governance group, to ensure decisions affecting data are not made exclusively through a technology lens.

Whole-of-government governance groups

Data and Digital Ministers' Meeting

Data and Digital Ministers from all Australian jurisdictions meet quarterly to drive cross-government collaboration on national data and digital priorities. Membership comprises data and digital Ministers from each of the Commonwealth, states and territories, as well as New Zealand. The chair of DDMM is the Commonwealth Minister for Finance who is responsible for public data and related matters, and whole of government data and digital policy coordination.

The DDMM oversees development of Australia's public data and digital capability, including through national alignment (e.g. working to a shared vision and common standards), harmonisation (e.g. sharing information to minimise duplication) and interoperability (e.g. Commonwealth and state-based systems can work together).

The DDMM is responsible for progressing three strategic priorities:

- i. delivering a seamless Digital ID experience for citizens
- ii. reforming cross-jurisdictional data and digital platforms, services and protocols
- iii. transforming services around life events.

The DDMM is supported by a Senior Officials Group comprising senior representatives from state, territory and New Zealand governments with responsibility for data and/or digital matters.

For more information on the DDMM, please email the secretariat: ddmm@finance.gov.au

Secretaries Digital and Data Committee

The Secretaries' Digital and Data Committee (SDDC) is a sub-committee of the APS Secretaries' Board. The purpose of the SDDC is to provide strategic leadership to promote an APS enterprise approach to the planning, coordination, investment, assurance, and delivery of trusted and secure digital and data capabilities across government.

There are two permanent SDDC sub-committees, the:

- Digital Leadership Committee with responsibility over the APS digital ecosystem; and
- Deputy Secretaries Data Group with responsibility over the APS data ecosystem.

Deputy Secretaries Data Group

The Deputy Secretaries Data Group (DSDG) is responsible for driving strategic direction and priorities on a whole-of-government data agenda and supporting data initiatives under the Data and Digital Government Strategy.

The DSDG reports to and supports the Secretaries Digital and Data Committee (SDDC) and will raise matters to and fulfil taskings from the SDDC as appropriate.

For more information on the DSDG, please email the secretariat: dsdg-coord@finance.gov.au

Chief Data Officers Group

The Chief Data Officer Group (CDO Group) is a strategic decision-making group providing stewardship for data at a whole of APS level, reporting to the DSDG. The CDO Group was established in January 2025 and replaces the Data Champions Executive.

As a sub-committee of the DSDG, the CDO Group will escalate matters to and undertake taskings from the DSDG as appropriate.

Each year, the CDO Group assembles a series of working groups to complete projects aimed at driving progress on specific shared issues on the data agenda.

For more information on the CDO Group, please contact Finance at ChiefDataOfficersGroup-Coord@finance.gov.au.

Have you considered other data guidance material?

Below is a list of resources that complement this document to give you a broader understanding of data in the APS:

- [Chief Data Officers Information Pack](#)
- [The Australian Government Data Governance Framework](#)
- [Data Ethics Framework](#)
- [Data Maturity Assessment Tool](#)
- [Framework for the Governance of Indigenous Data](#)