

Australian Government

Safety, Rehabilitation and Compensation Commission

Commission Data Warehouse Data Governance Protocol

June 2020

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Original document endorsed by the Safety, Rehabilitation and Compensation Commission, 19 March 2008.

For more information, please contact the Director, Scheme Reporting and Analysis Team, Comcare on 1300 366 979

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Comcare GPO Box 9905, Canberra ACT 2601 Phone 1300 366 979 www.comcare.gov.au

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1 Purpose

- 1.1 The conditions of licence for self-insured licensees (licensees) under the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act) require that each licensee provide the Safety, Rehabilitation and Compensation Commission (the Commission) with information relating to its operations under the SRC Act.
- 1.2 In June 2006, the Commission endorsed specifications for a Commission Data Warehouse (CDW) for the collection and storage of claims data from all licensees under the SRC Act. The CDW is intended to accommodate the majority of the Commission's claims data requirements and assist Comcare in fulfilling its data reporting and analysis requirements.
- 1.3 This document describes the policies that govern the collection, management, use and security of CDW data.

2 Supporting documents

2.1 This document refers to a range of supporting documents. In each case, this implies the current version of the relevant document. For more information, please contact the Director, Scheme Reporting and Analysis team, Comcare on 1300 366 979.

3 Data collection

3.1 Each licensee, or an agent with expressed permission from a licensee, will supply data to the CDW in accordance with the Commission Data Warehouse Specifications (CDW Specifications), which define the content and format of data to be reported to the CDW (CDW Specifications, Sections 3 and 4) and the data transfer process (CDW Specifications, Section 2).

4 Data management

Control and Responsibility

- 4.1 Overall control of the CDW and CDW Specifications rests with the Commission.
- 4.2 Revisions to the CDW Specifications will be undertaken in consultation with all licensees.
- 4.3 Comcare will manage the CDW on behalf of the Commission.
- 4.4 Comcare will only use and disseminate CDW data in accordance with this protocol.

Data Quality Reviews

4.5 Comcare will undertake data quality reviews of data reported to the CDW by licensees in accordance with the Commission approved Data Quality Review Methodology.

5 Data use

Confidentiality

5.1 Information generated from the CDW will be subject to the *Commission Data Warehouse Data Confidentiality Policy*, provided at **Attachment A**.

Reporting and Analysis

- 5.2 Comcare will generate Commission key performance indicator reports relating to each licensee from CDW data in accordance with the current *Licensee Key Performance Indicator (LKPI) Specifications*.
- 5.3 Comcare will generate the Australian Government scheme's annual submission to Safe Work Australia's (SWA's) National Data Set for Compensation-based Statistics (NDS) from CDW data in accordance with the NDS *specifications*.
- 5.4 Comcare will generate summary information relating to each licensee from CDW data as required by the Commission to fulfil its annual reporting requirements (SRC Act, s. 89S).
- 5.5 Comcare may utilise CDW data in responding to Commission requests for information relating to an individual licensee or a group of licensees.
- 5.6 Comcare may utilise CDW data as appropriate in performing any other of its functions under the SRC Act, the *Work Health and Safety Act 2011* (WHS Act). These functions include, but are not limited to:
 - conducting research into the rehabilitation of employees and the incidence and prevention of injury to employees and publishing material relating to this function (SRC Act, ss. 69(d) and 69(e)); and
 - investigating compliance with the WHS Act (WHS Act, s. 160).

Information identifying or enabling the identification of an individual licensee, will not be released to third parties in performing these functions without first obtaining permission from the relevant licensee.

- 5.7 Comcare may utilise CDW data for the purposes of conducting data quality reviews of a licensee.
- 5.8 Comcare may utilise CDW data to assist a licensee or its agent conduct data quality reviews or performance audits. Data relating to an individual licensee will not be released to third parties in this process without first obtaining permission from the relevant licensee.
- 5.9 Comcare may utilise CDW data in responding to ad hoc requests from external parties for information relating to the SRC scheme. Information identifying or enabling the identification of an individual licensee will not be released in this process without first obtaining permission from the relevant licensee. Ad hoc requests for information relating to an individual licensee will be referred to the relevant licensee for response.
- 5.10 All necessary caveats will be included to deter inaccurate interpretations of data generated from the CDW.
- 5.11 Information relating to an individual licensee generated from CDW data will be provided to the relevant licensee for information prior to release by Comcare.

6 Data security/access

- 6.1 The physical security of the equipment (server) on which the data are stored, together with the application of access security protocols to prevent unauthorised intrusions into the database, are included as part of the overall *Comcare Security Policy*.
- 6.2 Comcare's network, gateway and core applications are certified to 'UNCLASSIFIED with Dissemination Limiting Markers (DLMs)'. Comcare will use FOR-OFFICIAL-USE-ONLY, SENSITIVE, SENSITIVE:PERSONAL and SENSITIVE:LEGAL. Where relevant this certification is provided through a Security Construction and Equipment Committee (SCEC) endorsed Infosec Registered Assessor Program (IRAP) certifier.
- 6.3 Access to the data warehouse is restricted to officers working in the Scheme Reporting and Analysis, Self Insurance and Technology teams of Comcare.
- 6.4 When providing data extracted from the CDW to external parties, Comcare will utilise an appropriate means of data transfer according to the assessed security level of the data.
- 6.5 Secure access to the CDW may be provided to an individual licensee or its agent. In providing access, a licensee or its agent will only be able to access information in relation to that licensee and overall scheme performance. Data relating to an individual licensee will not be made available to third parties in this process without first obtaining permission from the relevant licensee.

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Commission Data Warehouse Data Confidentiality Policy

This policy has been developed to provide procedures to protect the confidentiality of information on individual employees and licensees reported to the Commission Data Warehouse (CDW).

Comcare will handle injured workers' personal information in line with the Australian Privacy Principles (APPs) from Schedule 1 of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

7 Rules to Protect Data

- 1. The contact details of claimants, including their names, addresses and telephone numbers will, except as allowed for under paragraph 5 below:
 - only be used for research purposes;
 - not be used to contact claimants for reasons other than research;
 - not be used to identify the responses of unique individuals; and
 - not be released unless required to do so by law.
- 2. Unit record data will not be released from the CDW, except as allowed for under paragraph 5 below.
- 3. Data identifying or enabling the identification of an individual licensee or employee will not be released from the CDW, except as allowed for under paragraph 5 below.
- 4. In releasing CDW data in the form of statistical tables, if the value in any cell of the table is less than six then the value of the cell will be suppressed, except as allowed for under paragraph 5 below. In tables with derived values (such as frequency rates or incidence rates), where publication will enable the calculation of the original value of a suppressed cell, those values will also be suppressed.
- 5. Rules 1 to 4 above will not be applied with respect to the release of data:
 - required by the Safety, Rehabilitation and Compensation Commission (the Commission) or Comcare in performing their respective functions under the Safety, Rehabilitation and Compensation Act 1988, (for example, to conduct and promote research into the rehabilitation of employees and the incidence and prevention of injury to employees (SRC Act ss. 69(d)) and the Work health and Safety Act 2011. For example, individual licensees are required to be identified in Commission key performance indicator reports and the Commission's Annual Report;
 - for the purpose of reporting unit record data to Safe Work Australia's (SWA's) National Data Set for Compensation-based Statistics (NDS). The confidentiality of data reported to the NDS is governed by the SWA's confidentiality policy;
 - in accordance with SWA policy, if the information is already available in the public domain, for example in the case of compensated fatalities data; or
 - if a licensee gives express consent for the release information which may identify, or enable the identification of, that licensee.

Version control

Version	Date	Description
1.0	March 2008	Original version.
2.0	May 2013	Para 6.2 upgrades to Comcare's network in relation to data security and access
		References to the Office of the Australian Safety and Compensation Council (OASCC) have been replaced with Safe Work Australia (SWA)
		• References to the Occupational Health and Safety Act 1991 have been replaced with Work Health and Safety Act 2011
		References to Commission Indicators (CI) replaced with Determining Authority Key Performance Indicators (DAKPI)
		 Attachment A – Rules to Protect Data, paras 1 and 5
		Comcare team names and dates updated
2.1	August 2013	Attachment A – Rules to Protect Data, paras 1 and 5 amended to further clarify Comcare's use of injured worker contact details
22	October 2014	Insert Version control
		• Paragraphs 5.6 and 5.9 – insertion of words 'without first obtaining permission from the relevant determining authority'
		Attachment A – Insert reference to Information Privacy Principals
		Comcare team names and dates updated
3.0	June 2020	References to DAKPIs have been replaced with Licensee Key Performance Indicators (LKPIs)
		References to Data Audits have been replaced with Data Quality Reviews
		Attachment A – Insert reference to Australian Privacy Principles
		Comcare team names and dates updated