

Quality of Victoria's Critical Data Assets

May 2025

Independent assurance report to Parliament
2024–25:15



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Quality of Victoria's Critical Data Assets

Independent assurance report to Parliament

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May 2025

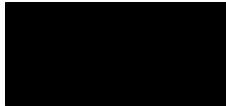
The Hon Shaun Leane MLC
President
Legislative Council
Parliament House
Melbourne

The Hon Maree Edwards MP
Speaker
Legislative Assembly
Parliament House
Melbourne

Dear Presiding Officers

Under the provisions of the *Audit Act 1994*, I transmit my report *Quality of Victoria's Critical Data Assets*.

Yours faithfully



Dave Barry
Acting Auditor-General
14 May 2025

The Victorian Auditor-General's Office (VAGO) acknowledges the Traditional Custodians of the lands and waters throughout Victoria. We pay our respects to Aboriginal and Torres Strait Islander communities, their continuing culture, and to Elders past and present.

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Review snapshot

Do Victorian Government agencies assure the quality of their critical data assets?

Why we did this review

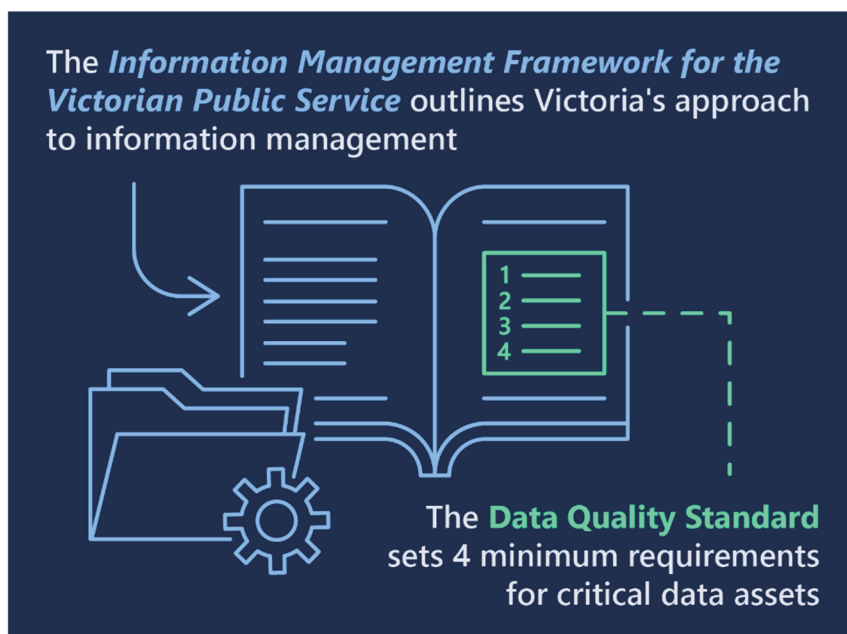
Government's ability to make informed decisions is critical. Trusted, high-quality data provides a foundation for confident decision-making, informs policy development and supports service delivery.

The presence of unassured or low-quality data across government is a recurring theme in our performance engagements. We previously identified data quality issues in several critical datasets across Victorian government departments and Victoria Police (referred to as agencies in this report).

We conducted this review to better understand whether agencies assure the quality of their critical data assets.

To do this, we reviewed whether agencies meet the *Data Quality Information Management Framework* standard (Data Quality Standard) requirements.

Key background information



Source: VAGO.

What we concluded

Government agencies are not assuring the quality of their critical data assets in line with the Data Quality Standard.

This is because no audited agency meets the Data Quality Standard in full:

- Most agencies do not have clearly defined approaches for identifying their critical data assets.
- Data management governance arrangements in place do not clearly focus on maintaining and improving critical data assets' quality.
- None of the agencies completed the required data quality management plan and data quality statement for each critical data asset.

Without a consistent approach to assuring critical data assets' quality, agencies risk giving advice and making decisions based on unreliable information.

Critical data assets

Critical data assets are collections of data that would have a significant impact on an agency's or the community's social or economic wellbeing if they were unavailable, damaged or destroyed. Critical data assets can include service activity records, payroll information and payment system information.

1.

Our findings

What we examined

For this review we had a single line of inquiry:

1. Do agencies meet the requirements of the *Data Quality Information Management Framework* standard (Data Quality Standard)?

To answer this question, we examined:

- Department of Education (DE)
 - Department of Energy, Environment and Climate Action (DEECA)
 - Department of Families, Fairness and Housing (DFFH)
 - Department of Government Services (DGS)
 - Department of Health (DH)
 - Department of Justice and Community Safety (DJCS)
 - Department of Jobs, Skills, Industry and Regions (DJSIR)
 - Department of Premier and Cabinet (DPC)
 - Department of Transport and Planning (DTP)
 - Department of Treasury and Finance (DTF)
 - Victoria Police.
-

Background information

Information management framework

Victoria's approach to information management is outlined in the *Information Management Framework for the Victorian Public Service* (the Framework). The Victorian Government issued version 1.0 of the Framework in 2016 for the period to 2020. This timeframe aligned to the vision statement in the Framework:

By 2020, the Victorian Government and its citizens will have access to trusted information that improves decision making, enables insight and supports the planning and delivery of good policy and better services to the public.

The Framework provides a high-level view of government's information management landscape and a shared direction for information management across agencies.

Although the Framework ostensibly lapsed in 2020, the requirements continue to provide a foundation for a consistent approach to measure, communicate and improve data quality across government.

The Data Quality Standard and its related *Data Quality Guideline Information Management Framework* (the Guideline) are part of the Framework.

Data Quality Standard

The Data Quality Standard requires all agencies to establish and maintain quality standards for critical data assets. Agencies need to define their own requirements and acceptable data quality levels according to:

- user needs
- how the data will be used
- the processes and purposes the data supports.

The Data Quality Standard sets 4 minimum requirements to be applied to all critical data assets.

Figure 1: Minimum requirements for critical data assets



Source: VAGO.

The Data Quality Standard requires a data quality management plan to be completed for each critical data asset. Data quality management plans are a key mechanism for agencies to assess and identify ways to improve data quality over time.

Agencies use these plans to report on quality issues and track improvement actions.

Data quality management plans should include initial data quality assessment results, set out areas for improvement and actions to address data quality issues. The data asset custodian should review and update the plan at least once a year.

Data asset custodian

A data asset custodian is the person responsible for a data asset's day-to-day management. Data custodians are usually subject matter experts and should have strong business knowledge of the asset.

The Data Quality Standard also requires a data quality statement for each critical data asset.

Data quality statements provide information about the asset, including issues that may affect the data asset's quality, and help agencies make decisions about the data's use.

The Guideline specifies that data quality statements need to include:

- an assessment against all 7 data quality dimensions, highlighting its strengths and weaknesses
- a disclaimer about the data asset's use.

Data quality statements help reduce the risk of data misuse by clearly identifying the asset's characteristics and limitations. Data custodians are responsible for completing data quality statements for all their critical data assets.

Implementing the Data Quality Standard

The Victorian Government issued the Guideline to support agencies implementing the Data Quality Standard.

The Guideline provides information about:

- the data quality dimensions
- roles and responsibilities for good data governance
- how to complete the required data quality management plan and data quality statement.

The Guideline says that agencies should identify and register critical data assets in an information asset register. This helps agencies efficiently identify key information and data assets. An agency's information asset register should give an accurate and overall view of their data assets.

Information asset register

An information asset register is a tool agencies use to record the important information they hold. Agencies are expected to have information asset registers that list the agency's critical data assets. Registers are usually accessible across the entire agency.

The Guideline also sets key responsibilities for data asset custodians.

Responsibilities include:

- assisting with developing data quality management plans and data quality statements
- making sure changes to plans and processes are documented
- making sure data quality statements are completed for all critical assets
- confirming the statement's status is recorded in the agency's information asset register
- making sure processes meet internal data quality standards, guidelines and policies.

What we found

This section focuses on our single key finding that none of the audited Victorian Government agencies meet the Data Quality Standard requirements in full.

Consultation with agencies

When reaching our conclusions, we consulted with the reviewed agencies and considered their views.

You can read their full responses in Appendix A.

Key finding: None of the audited agencies meet the Data Quality Standard requirements in full

None of the audited agencies can demonstrate that they are assuring their critical data assets quality in line with the Data Quality Standard.

Most audited agencies do not have clear, documented approaches for identifying and registering critical data assets

We found that only DH, DFFH, DEECA, DTP and Victoria Police have a clear and documented approach to assessing and identifying critical data assets in line with the Framework.

These 5 agencies showed evidence that either a data owner or custodian approved their critical data assets, or that they have a well-designed process for capturing that approval. Figure 2 shows that these agencies have different approaches to assess how critical their data assets are.

Some agencies use the *Victorian Protective Data Security Framework Business Impact Levels* (VPDSF BIL) table to measure the impact levels if their critical data assets became unavailable, damaged or destroyed. Business Impact Level (BIL) scores range from zero to 5, with zero being no impact and 5 being the most severe impact.

For this review, we considered BIL scores a viable way for agencies to determine if data assets are critical, provided agencies consistently followed a transparent and documented framework.

Figure 2: Approaches for identifying critical data assets

Agency	Approach	Criteria for determining critical data assets
DH, DFFH	Defined set of core principles using the criticality definition set out in the Framework.	Data assets are: - operational and used to make decisions about patients or clients - departmental information used to run the organisation - datasets of high importance, value or risk - datasets used to supply data to the Australian Government per reporting obligations.
DEECA, DTP	VPDSF BIL scores.	BIL score of 3 (major impact) or higher, and a 'protective' marking.
Victoria Police	Security, information and privacy assessment process in line with the Guideline.	Criticality is informed by: - security marking (e.g. protective) - business impact level - required retention and disposal duration (e.g. 100+ years) - whether data is covered by legislation (e.g. Royal Commission).

Note: This table only presents information for agencies that have a clear and documented method for identifying critical data assets.
Source: VAGO.

Of the 5 agencies that have documented processes for identifying critical data assets, DH, DFFH, DTP and Victoria Police clearly list them in their information asset registers.

DEECA registers BIL scores in line with Office of the Victorian Information Commissioner's *Sample Information Asset Register Template*. DEECA updated its register in February 2025 to flag assets that meet their criticality criteria.

All other agencies assess information and data assets' security value using BIL assessments, in line with VPDSF BIL requirements.

But they do not have a clear and documented approach for using BIL scores to determine if a data asset is critical or non-critical.

Most audited agencies do not have formal governance arrangements to manage critical data assets

We found that most agencies have not developed specific data quality management policies for critical data assets. Only DFFH, DH and DTP showed evidence of comprehensive, agency-wide policies and procedures for improving critical data assets' quality.

Most agencies set out clear quality management responsibilities for data custodians. Seven of the 11 agencies defined custodian roles in the policies, frameworks or guidelines we reviewed. But only DH and DFFH set out specific responsibilities for managing critical data assets.

Without clear roles and management policies, there is a risk that agencies' most important data assets will not be effectively managed.

None of the audited agencies complete a data quality management plan for all critical data assets

Generally, agencies do not complete data quality management plans for critical data assets. Only DH showed evidence that its data quality management plans align with Guideline requirements.

DH provided data quality management plans for 13 out of 30 critical data assets. Of the 13 provided, 4 plans were incomplete and did not set out areas for improvement or actions to address data quality issues.

No other agencies had up-to-date data quality management plans for their critical data assets.

This means there is a risk that critical data assets are not maintained consistently, with unresolved data quality issues and limited improvement progress.

None of the audited agencies complete a data quality statement for all critical data assets

Only one agency, DH, has data quality statements that meet requirements set out in the Guideline.

DH provided us with data quality statements for 13 out of 30 critical data assets. But our review found that 5 of the 13 data quality statements were incomplete and did not have data quality descriptions. This means that they do not provide insight into the data's quality.

No other agencies have up-to-date data quality statements for individual critical data assets as set out in the Guideline.

Without these, agency staff may not be able to make informed decisions about using data to support their decision-making or advice to government.

Addressing this finding

To address this finding, we made one recommendation to all agencies about implementing a risk-based approach to managing and maintaining critical data assets quality.

2.

Our recommendations

We made one recommendation to address our findings. All audited agencies have accepted the recommendation.

Recommendation		Agency response
Finding: None of the audited agencies meet the requirements of the <i>Data Quality Information Management Framework</i> standard in full		
All audited agencies	1 Implement a risk-based approach to managing and maintaining critical data asset quality. This includes: - identifying risks to data quality, evaluating their likelihood and potential impact on critical data asset quality - assessing consequences of poor critical data asset quality - developing policies or frameworks that define roles and responsibilities for managing critical data assets - establishing processes that set out activities for assessing, monitoring and maintaining critical data asset quality, at planned intervals.	Accepted

3.

Appendices

There are 3 appendices covering responses from audited agencies and information about how we perform our work.

Appendix A: Submissions and comments

Appendix B: Abbreviations, acronyms and glossary

Appendix C: Review scope and method

Appendix A:

Submissions and comments

We consulted with agencies and considered their views when reaching our review conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report, or relevant extracts, to those agencies and asked for their submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the relevant agency head.

Responses received

Agency	Page
Department of Education	A-2
Department of Energy, Environment and Climate Action	A-4
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Department of Justice and Community Safety	A-15
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Department of Transport and Planning	A-19
Department of Treasury and Finance	A-21
Victoria Police	A-23



Department of Education

Secretary

2 Treasury Place
East Melbourne Victoria 3002
Telephone +613 9637 2000

COR25159744

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office



Andrew
Dear Mr Greaves

Proposed report: Quality of Victoria's Critical Data Assets

Thank you for your letter of 1 April 2025 and the opportunity to comment on the proposed report for this limited assurance review.

The Department of Education (the department) is committed to assuring the quality of their critical data assets. The department has reviewed the proposed report and has no feedback. The department's proposed action plan to address the recommendation is attached.

Should your office wish to discuss the department's response, they can contact



Yours sincerely



Tony Bates PSM

A/Secretary

15/4/2025

Encl.: The department's proposed action plan

Your details will be dealt with in accordance with the *Public Records Act 1973* and the *Privacy and Data Protection Act 2014*. Should you have any queries or wish to gain access to your personal information held by this department please contact our Privacy Officer at the above address



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DE action plan: Quality of Victoria's critical data assets

Recommendations: That all audited agencies:	Response	#	The Department will:	By:
Implement a risk-based approach to managing and maintaining critical data asset quality. This includes: - identifying risks to data quality, evaluating their likelihood and potential impact on critical data asset quality - assessing consequences of poor critical data asset quality - developing policies or frameworks that define roles and responsibilities for managing critical data assets - establishing processes that set out activities for assessing, monitoring and maintaining critical data asset quality, at planned intervals.	Accept	1.1	a. Identify key DE data assets and document them in a data catalogue. b. Conduct risk assessment and evaluate potential consequences of poor data quality for these key data assets. c. Based on the severity of their potential consequences, determine which ones are critical data assets and catalogue them. d. Implement processes and activities for assessing, monitoring, reporting, and maintaining critical data asset quality, at planned intervals.	31/12/2026
		1.2	a. Update DE Enterprise Data Governance Framework to include roles and responsibilities for data owners and stewards to manage their critical data assets. b. Allocate data owners and stewards to manage the quality of critical data assets under the guidance of the Data Governance team that manages the data quality framework.	31/12/2025
		1.3	Update the existing DE Data Quality Framework to: - align it with the data owner and steward roles specified in the Data Governance Framework, and - establish processes and activities for assessing, monitoring, reporting, and maintaining critical data asset quality, at planned intervals.	31/12/2025



Department of Energy, Environment
and Climate Action

PO Box 500, East Melbourne,
Victoria 8002 Australia

SEC-250400042

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
Level 31 / 35 Collins Street
MELBOURNE VIC 3000

Via email: [REDACTED]

Dear Auditor-General

Proposed report - Quality of Victoria's critical data assets

Thank you for your invitation to comment on the Victorian Auditor-General's Office's proposed report for the performance engagement – *Quality of Victoria's critical data assets* received 1 April 2025.

The Department of Energy, Environment and Climate Action recognises the need for effectively assuring the quality of our critical data assets.

DEECA welcomes your findings and accepts the recommendation detailed in the report. A proposed action plan for addressing this recommendation is enclosed.

I thank your staff for their work and look forward to a continued productive relationship with your office.

Yours sincerely

[REDACTED]

John Bradley
Secretary

15/04/2025

Encl. Department of Energy, Environment and Climate Action – action plan responding to performance engagement – *Quality of Victoria's critical data assets*.



Official - Sensitive

Department of Energy, Environment and Climate Action – action plan to address recommendations from VAGO's report: *Quality of Victoria's critical data assets*

No	Recommendations	Acceptance	Agreed Action	Completion Date
#1	Implement a risk-based approach to managing and maintaining critical data asset quality. This includes: - identifying risks to data quality, evaluating their likelihood and potential impact on critical data asset quality - assessing consequences of poor critical data asset quality - developing policies or frameworks that define roles and responsibilities for managing critical data assets - establishing processes that set out activities for assessing, monitoring and maintaining critical data asset quality, at planned intervals	☒ Yes ☐ No ☐ In part ☐ In principle	DEECA will establish a 'Data quality for critical data assets' framework that will: - include the process for assessing the risks associated with data quality - include the process for assessing the consequences of poor critical data asset quality - involve reviewing and updating existing policies to ensure they define roles and responsibilities for managing critical data assets - set out activities for assessing, monitoring and maintaining critical data asset quality.	31/10/2026



Department of Families, Fairness and Housing

50 Lonsdale Street
Melbourne Victoria 3000
Telephone: 1300 475 170
GPO Box 1774
Melbourne Victoria 3001
www.dffh.vic.gov.au
DX 210319

BAC-EOB-911

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
Via e-mail: [REDACTED]

Dear Mr Greaves

Thank you for the opportunity to review and comment on the *Proposed Report: Quality of Victoria's Critical Data Assets*.

The findings and recommendations are fair and have provided the department with useful information to inform improvements in policy and standards compliance. I am pleased to include my department's actions in response to the recommendations as an attachment to this letter.

I would like to take this opportunity to thank your staff for working collaboratively with our department. Should you have any queries, please contact [REDACTED] at the Department of Families Fairness and Housing on [REDACTED].

Yours sincerely

[REDACTED]

Peta McCammon
Secretary

11 / 04 / 2025



OFFICIAL

OFFICIAL: Sensitive

Department of Families, Fairness & Housing's action plan to address recommendations from *Quality of Victoria's Critical Data Assets*

No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
1	Implement a risk-based approach to managing and maintaining critical data asset quality. This includes: a. identifying risks to data quality, evaluating their likelihood and potential impact on critical data asset quality b. assessing consequences of poor critical data asset quality c. developing policies or frameworks that define roles and responsibilities for managing critical data assets d. establishing processes that set out activities for assessing, monitoring and maintaining critical data asset quality, at planned intervals.	☐ Yes ☐ No ☐ In part ☐ In principle	1a & b – Accept Data Quality Management Plans and Data Quality Statements for the 13 DFFH critical assets identified to be completed. 1c – No action required, DFFH was found to have appropriate policies in place. 1d – Accept Information Custodians to develop processes for critical assets to ensure compliance with the Data Quality Policy.	30 June 2026 30 June 2026



Department of Government Services

Level 5
1 Macarthur Street
East Melbourne Victoria 3002
Telephone: (03) 9651 5111
dgs.vic.gov.au

Our ref: BSEC 250300875

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
Level 31, 35 Collins Street
MELBOURNE VIC 3000

By email: [REDACTED]

Dear Auditor-General

Thank you for your letter dated 1 April 2025 enclosing the proposed report *Quality of Victoria's Critical Data Assets 2024* for my consideration and comment.

The Department of Government Services (DGS) acknowledges the report and supports its recommendation. DGS is committed to continually improving our data quality management practices and incorporating the recommendation from VAGO for ourselves, as well as our customer departments, Departments of Premier and Cabinet and Treasury and Finance.

DGS' response to your report is attached in the action plan that outlines how the department will implement the recommendation.

Should your office require further information, they may contact [REDACTED]

at [REDACTED]

Yours sincerely

Jo de Morton
Secretary

15/04/2025

Your details will be dealt with in accordance with the *Public Records Act 1973* and the *Privacy and Data Protection Act 2014*. Should you have any queries or wish to gain access to your personal information held by this department please contact our Privacy Officer at the above address.



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Attachment: Department of Government Services action plan to address recommendations from the VAGO audit: *Quality of Victoria's Critical Data Assets*

No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
1	Implement a risk-based approach to managing and maintaining critical data asset quality. This includes: - identifying risks to data quality, evaluating their likelihood and potential impact on critical data asset quality - assessing consequences of poor critical data asset quality - developing policies or frameworks that define roles and responsibilities for managing critical data assets - establishing processes that set out activities for assessing, monitoring and maintaining critical data asset quality, at planned intervals.	Yes ☒ No ☐ In part ☐ In principle ☐	Develop our data management governance framework including: - defining the criteria for identifying the criticality of data assets - developing data management policy and procedural guidance including data quality and risk management and incorporate into the Information and Security Management framework (SMF) - establishing an education process to train and remind business owners of requirements and responsibilities for data management - engaging with business owners to identify critical data assets and capture in our Information Asset Registers (IAR) - assisting business owners to develop data quality statements and data quality management plans for critical data assets recorded in our IARs - an ongoing review process to validate currency of our IARs	30-June-2026

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Secretary

Department of Health

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Melbourne Victoria 3001
www.health.vic.gov.au
DX 210081

BAC-CO-54575

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office

Via e-mail: [REDACTED]

Dear Mr Greaves

Thank you for your letter of 1 April and for providing the opportunity to review and comment on the *Proposed Report: Quality of Victoria's Critical Data Assets*.

The findings and recommendations have provided the department with useful information to inform improvements in policy and standards compliance. I am pleased to include my department's actions in response to the recommendations as an attachment to this letter.

I would like to take this opportunity to thank your staff for working collaboratively with our department. Should you have any queries, please contact [REDACTED]

on [REDACTED]

Yours sincerely

Jenny Atta
Secretary

10/04/2025

Attachment 1: DH Action plan



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Department of Health action plan to address recommendations from *Quality of Victoria's Critical Data Assets*

No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
1	Implement a risk-based approach to managing and maintaining critical data asset quality. This includes: a) identifying risks to data quality, evaluating their likelihood and potential impact on critical data asset quality b) assessing consequences of poor critical data asset quality c) developing policies or frameworks that define roles and responsibilities for managing critical data assets d) establishing processes that set out activities for assessing, monitoring and maintaining critical data asset quality, at planned intervals.	☐ Yes ☐ No ☐ In part ☐ In principle	1a & b – Accept Continue development of Data Quality Management Plans and Data Quality Statements for the remaining 17 critical assets (and finalisation for the 4 assets with incomplete artefacts) to be completed. 1c – No action required, DH was found to have appropriate policies in place. 1d – Accept Information Custodians to develop processes for critical assets to ensure compliance with the DH Data Quality Policy.	30 June 2026 30 June 2026

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Department of Jobs, Skills, Industry and Regions

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Melbourne, Victoria 3001 Australia
Telephone: +61 3 9651 9999

Ref: CSEC-2-25-26197

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
Level 31, 35 Collins Street
MELBOURNE VICTORIA 3000

Dear Mr Greaves

PROPOSED REPORT: QUALITY OF VICTORIA'S CRITICAL DATA ASSETS

Thank you for your letter dated 1 April 2025 providing the proposed report for the Quality of Victoria's Critical Data Assets limited assurance review.

The Department of Jobs, Skills, Industry and Regions accepts VAGO's recommendation. Enclosed with this correspondence are the actions the department will take to address the recommendation.

I thank your team for their engagement with the department on this audit. If you require further information, [REDACTED] can be contacted on [REDACTED]

Yours sincerely



Matt Carrick
Secretary

15/04/2025



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Department of Jobs, Skills, Industry and Regions (DJISR) action plan to address recommendations from *Quality of Victoria's Critical Data Assets*

No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
1	Implement a risk-based approach to managing and maintaining critical data asset quality. This includes: - identifying risks to data quality, evaluating their likelihood and potential impact on critical data asset quality - assessing consequences of poor critical data asset quality - developing policies or frameworks that define roles and responsibilities for managing critical data assets - establishing processes that set out activities for assessing, monitoring and maintaining critical data asset quality, at planned intervals.	Acceptance ☒ Yes ☐ No ☐ In part ☐ In principle	DJSIR accept VAGO's recommendation to improve and implement a stronger risk-based approach for managing and maintaining critical data assets by implementing the following: - Establish a risk assessment process to assess data quality for all critical data assets - Define key data quality metrics - Engage relevant business areas to provide input on potential data risks - Create a risk assessment template for ongoing evaluation. - Establish a process to enable relevant business areas to implement data quality statements that clearly outline the risks and consequences of poor data quality - Develop data quality statement template - Provide guidance and training to business areas on how to assess and document critical data risks.	30 December 2025

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No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
			3. Update the department's Critical Data Assets Policy and Framework to include definitions of responsibilities for critical data roles 3.1. Review existing data governance policies and frameworks to identify gaps 3.2. Update documentation to include specific roles and responsibilities 3.3. Ensure alignment between data governance policies and other organisational policies.	30 September 2025
			4. Investigate with People and Culture (P&C) the possibilities to include critical data asset responsibilities in position descriptions 4.1. Engage with P&C to revise job descriptions for roles that interact with critical data 4.2. Inclusion of data quality responsibilities and expectations in Performance and Development Plans.	30 September 2025
			5. Develop a cyclical review period for critical data assets in line with DJSIR risk framework 5.1. Establish timeline for reviewing data assets 5.2. Define specific criteria for when data quality assessments should trigger a review (i.e. significant system updates, regulatory changes etc) 5.3. Align the review process with existing risk management frameworks to ensure consistency.	30 December 2025

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PROTECTED



Department of Justice and Community Safety

Secretary

Level 26
121 Exhibition Street
Melbourne Victoria 3000
Telephone: (03) 8684 0501
justice.vic.gov.au

Our ref: EBC: 25041197

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
Via email: [REDACTED]

Proposed report: Quality of Victoria's Critical Data Assets

Thank you for your letter of 1 April 2025 providing me with the opportunity to review the proposed report for the assurance review on the *Quality of Victoria's Critical Data Assets*.

The Department of Justice and Community Safety (the department) is committed to managing its critical data assets to ensure the quality of its data to assist in decision-making and accurate reporting of service delivery.

The department accepts your recommendation directed to all audited agencies to implement a risk-based approach to managing and maintaining the quality of critical data assets. Please find attached the department's action plan to address your recommendation.

If you have any questions or require further information, please contact [REDACTED]

on [REDACTED]

Yours sincerely

Kate Houghton PSM
Secretary

17/03/2025



DJCS action plan

Quality of Victoria's Critical Data Assets

#	VAGO recommends that all agencies:	Response	#	By:	By:
1	Implement a risk-based approach to managing and maintaining the quality of critical data assets that includes: - undertaking risk assessments to understand their data assets and evaluate the potential consequences of poor data quality - developing policies and/or frameworks that define roles and responsibilities for managing critical data assets - establishing processes that set out activities for assessing, monitoring and maintaining the quality of critical data assets, at planned intervals.	Accept	1.1	Undertake a review to identify and risk assess critical data assets and create data quality statements for critical data assets.	1/7/2026
			1.2	Update information value assessment and the information asset register framework to include: - roles and responsibilities for managing critical data assets - a requirement to identify and record critical data assets in information asset registers.	1/7/2026
			1.3	Create an assurance process to monitor and ensure the quality of critical data assets.	1/7/2026



Department of
Premier and Cabinet

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Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
Level 31, 35 Collins Street
MELBOURNE VIC 3000

BSEC-250400056

Dear Auditor-General

Thank you for your letter dated 1 April 2025 about the proposed report –
Quality of Victoria's Critical Data Assets 2024 limited assurance review.

The Department of Premier and Cabinet (DPC) acknowledges the report and supports its recommendation. DPC is committed to continually improving our data quality management practices and incorporating the recommendation from VAGO. We have engaged with DGS, our shared service provider, to progress this work.

DPC's response to your report is attached in the action plan which outlines how the department will implement the recommendation.

Should your office require further information, they may contact

at

Yours sincerely

Jeremi Moule
Secretary

..14../..4../2025

Encl.

OFFICIAL: Sensitive

Attachment: Department of Premier and Cabinet action plan to address recommendations from the VAGO audit: *Quality of Victoria's Critical Data Assets*

No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
1	Implement a risk-based approach to managing and maintaining critical data asset quality. This includes: - identifying risks to data quality, evaluating their likelihood and potential impact on critical data asset quality - assessing consequences of poor critical data asset quality - developing policies or frameworks that define roles and responsibilities for managing critical data assets - establishing processes that set out activities for assessing, monitoring and maintaining critical data asset quality, at planned intervals.	☒ Yes ☐ No ☐ In part ☐ In principle	Develop our data management governance framework Including: - defining the criteria for identifying the criticality of data assets - developing data management policy and procedural guidance including data quality and risk management and incorporate into the Information and Security Management framework (ISMF) - establishing an education process to train and remind business owners of requirements and responsibilities for data management - engaging with business owners to identify critical data assets and capture in our Information Asset Registers (IAR) - assisting business owners to develop data quality statements and data quality management plans for critical data assets recorded in our IARs - an ongoing review process to validate currency of our IARs	30-June-2026

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Department of Transport and Planning

GPO Box 2392
Melbourne, Victoria 3001 Australia

Ref: BSEC-1-25-1437

Mr Andrew Greaves
Auditor-General of Victoria
Victorian Auditor-General's Office
Level 31, 35 Collins Street
MELBOURNE VIC 3000

Dear Mr Greaves

Victorian Auditor-General's Office - Quality of Victoria's critical data assets - Proposed report

Thank you for your letter of 2 April 2025 enclosing the proposed report (**the Report**) for the *Quality of Victoria's critical data assets* limited assurance review and inviting the Department of Transport and Planning (**the Department**) to respond.

On behalf of the Department, I note the Report's conclusion that none of the agencies audited fully meet the requirements of the *Data Quality Information Management Standard* (**the Standard**).

I welcome the Report's recognition that the Department is one of three agencies meeting key components of the Standard. The Department is committed to continuing its journey to embed and improve its data management processes, and continues to:

- actively improve data governance and management practices including data quality.
- support data practitioners and governance roles to perform their responsibilities.
- ensure the appropriate care of data assets is managed throughout their lifecycles.

The Department accept the Report's single recommendation and has prepared an action plan which is enclosed in response.

Yours sincerely



Jeroen Weimar
Secretary

Date: 11 April 2025

Enc *Quality of Victoria's critical data assets* - DTP action plan



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DTP action plan

Quality of Victoria's critical data assets



Department of Transport and Planning (DTP) action plan to address the recommendation from *Quality of Victoria's critical*

data assets:

No	VAGO recommendation	DTP response	Due date
1	Implement a risk-based approach to managing and maintaining critical data asset quality. This includes: - identifying risks to data quality, evaluating their likelihood and potential impact on critical data asset quality - assessing consequences of poor critical data asset quality - developing policies or frameworks that define roles and responsibilities for managing critical data assets - establishing processes that set out activities for assessing, monitoring and maintaining critical data asset quality, at planned intervals.	Accepted DTP will implement a risk-based approach to managing and maintaining critical data asset quality in order to enhance accuracy, completeness and consistency. This will include: - Risk identification and evaluation. - Consequence assessment. - Developing policies or frameworks that define roles and responsibilities for managing critical data assets. - Establish processes that set out activities with a program of actions to maintain critical data asset quality.	31 December 2026



Department of Treasury and Finance

1 Treasury Place
Melbourne Victoria 3002 Australia
Telephone: +61 3 9651 5111
dtf.vic.gov.au

D25/39473

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
Level 31, 35 Collins Street
MELBOURNE VIC 3000

By email: [REDACTED]

Dear Auditor-General

Thank you for your letter dated 1 April 2025 about the proposed report - Quality of Victoria's Critical Data Assets 2024 limited assurance review.

The Department of Treasury and Finance (DTF) acknowledges the report and supports its recommendation. DTF is committed to continually improving our data quality management practices and incorporating the recommendation from VAGO. We have engaged with DGS, our shared service provider, to progress this work.

DTF's response to your report is attached in the action plan which outlines how the department will implement the recommendation.

Should your office require further information, they may contact [REDACTED]

at [REDACTED]

Yours sincerely

[REDACTED]
Secretary

12 / 4 / 2025

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Attachment: Department of Treasury and Finance action plan to address recommendations from the VAGO audit: *Quality of Victoria's Critical Data Assets*

No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
1	Implement a risk-based approach to managing and maintaining critical data asset quality. This includes: - identifying risks to data quality, evaluating their likelihood and potential impact on critical data asset quality - assessing consequences of poor critical data asset quality - developing policies or frameworks that define roles and responsibilities for managing critical data assets - establishing processes that set out activities for assessing, monitoring and maintaining critical data asset quality, at planned intervals.	☒ Yes ☐ No ☐ In part ☐ In principle	Develop our data management governance framework including: - defining the criteria for identifying the criticality of data assets - developing data management policy and procedural guidance including data quality and risk management and incorporate into the Information and Security Management Framework (ISMF) - establishing an education process to train and remind business owners of requirements and responsibilities for data management - engaging with business owners to identify critical data assets and capture in our Information Asset Registers (IAR) - assisting business owners to develop data quality statements and data quality management plans for critical data assets recorded in our IARs - an ongoing review process to validate currency of our IARs.	30-June-2026



VICTORIA POLICE

Office of the Chief Commissioner

Victoria Police Centre
311 Spencer Street
Docklands Victoria
3008 Australia

Telephone +61 3 8335 6400

P.O. Box 913
Melbourne Victoria 3001 Australia

Victorian Auditor-General
Mr. Andrew Greaves
Level 31/35 Collins Street,
Melbourne, VIC, 3000

Dear Mr Greaves,

Victoria Police response to the Proposed Provisional Report - Quality of Victoria's Critical Data Assets Limited Assurance review.

Thank-you for the opportunity to provide a response to your proposed report, dated 1 April 2025.

Previous VAGO audit findings have greatly assisted Victoria Police to enhance service delivery, improve accountability and strengthen risk management.

Victoria Police accepts the one recommendation: *Implement a risk-based approach to managing and maintaining critical data asset quality.*

Please find Victoria Police's action plan outlining our responses, actions and anticipated completion dates for the recommendation (Appendix A).

Yours Sincerely,



Rick Nugent APM
Acting Chief Commissioner

14 / 4 / 2025.

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Victoria Police action plan to address recommendations from Quality of Victoria's Critical Data Assets

No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
1	Implement a risk-based approach to managing and maintaining critical data asset quality. This includes: a) identifying risks to data quality, evaluating their likelihood and potential impact on critical data asset quality;	☒ Yes ☐ No ☐ In part ☐ In principle	Victoria Police agree with the VAGO recommendation. The following Agreed Management Actions are: 1) Update the <i>Information Asset Register</i> to distinguish between intelligence and operational critical data. 2) Continue to maintain a dedicated Data Quality Unit within the Police Enquiry and Data Sharing Department (PEDSD) to ensure the accuracy and completeness of information added to the Law Enforcement Assistance Program (LEAP) database. 3) Establish a <i>Victoria Police Data Reference Group</i> to work with the Commands to establish processes to support delivery of the data management framework and appropriate data quality statements.	Action 1): 30 Jun 2026 Action 2): COMPLETED Action 3): 30 Jun 2026
	b) assessing consequences of poor critical data asset quality;		4) Identify the consequences of poor data asset quality including critical data assets, and capture in the organisational strategic risk for Information Management. 5) Update the <i>Information Management Strategic Risk Report 2024 (Strategic Bowtie Information Management)</i> to highlight the consequences of poor critical data asset quality.	Action 4): COMPLETED Action 5): COMPLETED

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c) developing policies or frameworks that define roles and responsibilities for managing critical data assets; and		6) Complete development of the draft <i>Information Management and Data Quality Framework</i> , commenced in October 2024. 7) Develop a new policy underpinned by the framework, including a new program of work.	Action 6): 31 Dec 2025 Action 7): 30 Jun 2026
d) establishing processes that set out activities for assessing, monitoring and maintaining critical data asset quality, at planned intervals.		8) Continue and refine the established Working Groups which manage the process for any new data coming into critical operational and intelligence systems, with ongoing PEDSD representation to ensure high data quality. 9) Continue and refine the PEDSD representation on ACIC's National Data Quality Working Group, where data issues, solutions and cadences are also identified. 10) Continue the bi-annual self-assessments as aligned with the Public Record Office Victoria Information Management Maturity Assessment Program, which was extended in 2024 to incorporate data management. 11) Roll out and embed the enterprise Electronic Document and Records Management System (EDRMS), which was deployed on 31 March 2025 to uplift all information data assets including critical data assets. Monitor progress through the Data and Information Management Program of Work, engaging via the sub-committee of the Digital Transformation Committee.	Action 8): 30 Jun 2026 Action 9): 30 Jun 2026 Action 10): 30 October 2026 Action 11): 31 Dec 2025

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Appendix B:

Abbreviations, acronyms and glossary

Abbreviations We use the following abbreviations in this report:

Abbreviation	Full spelling
agencies	Victorian Government departments and Victoria Police
the Framework	<i>Information Management Framework for the Victorian Public Service</i>
Data Quality Standard	<i>Data Quality Information Management Framework</i> standard
the Guideline	<i>Data Quality Guideline Information Management Framework</i>

Acronyms We use the following acronyms in this report:

Acronym	Full spelling
BIL	Business Impact Level
DE	Department of Education
DEECA	Department of Energy, Environment and Climate Action
DFFH	Department of Families, Fairness and Housing
DGS	Department of Government Services
DH	Department of Health
DJCS	Department of Justice and Community Safety
DJSIR	Department of Jobs, Skills, Industry and Regions
DPC	Department of Premier and Cabinet
DTF	Department of Treasury and Finance
DTP	Department of Transport and Planning
VAGO	Victorian Auditor-General's Office
VPDSF BIL	<i>Victorian Protective Data Security Framework Business Impact Levels</i>

Glossary

The following terms are included in or relevant to this report

Term	Explanation
Level of assurance	This is a measure of the confidence we have in our conclusions. The quality and quantity of evidence we obtain affects our level of assurance. We design our work programs with the information needs of our report users in mind. We consider if we need to provide them with reasonable assurance or if a lower level of assurance may be appropriate.
Limited assurance	We obtain less assurance when we rely primarily on an agency's representations and other evidence generated by that agency. However, we aim to have enough confidence in our conclusion for it to be meaningful. We call these types of engagements assurance reviews and typically express our opinions in negative terms. For example, 'nothing has come to our attention to indicate there is a problem'. See our assurance services fact sheet for more information.
Reasonable assurance	We achieve reasonable assurance by obtaining and verifying direct evidence from a variety of internal and external sources about an agency's performance. This enables us to draw a conclusion against an objective with a high level of assurance. We call these performance audits. See our assurance services fact sheet for more information.

Appendix C:

Review scope and method

Scope of this review

Who we examined

We examined the following agencies:

Agency	Their key responsibilities
DE, DEECA, DFFH, DGS, DH, DJCS, DJSIR, DPC, DTF, DTP, Victoria Police	All agencies should comply with the Framework from December 2016 and the Data Quality Standard from March 2018.

Our review objective

Do Victorian Government agencies assure the quality of their critical data assets?

What we examined

This engagement assessed whether agencies have:

- identified their critical data assets
- assessed their critical data assets quality
- maintained required documentation for critical data assets
- established appropriate oversight of critical data assets.

Why we conducted this review

Government’s ability to make informed decisions is critical. Trusted high-quality data across government provides a foundation for confident decision-making, informs policy development and supports service delivery. It is required for data sharing between agencies and with the public. A recurring theme of our performance engagements is the presence of low-quality data or data of unassured quality. We have previously identified data quality issues in several critical datasets across agencies.

Aspects of performance examined

Our mandate for performance audits and reviews includes the assessment of economy, effectiveness, efficiency and compliance (often referred to as the ‘3Es + C’).

In this review we focused on the following aspects:

Economy	Effectiveness	Efficiency	Compliance
			

Key:

-  Primary focus
-  Secondary focus
-  Not assessed

Conducting this review

Assessing performance To form a conclusion against our objective we used the following lines of inquiry and associated evaluation criteria.

Line of inquiry	Criteria
1. Do agencies meet the requirements of the <i>Data Quality Information Management Framework Standard</i> (Data Quality Standard)?	1.1 Agencies have: - processes in place to identify critical data assets in line with the Framework and the Data Quality Standard - a critical data assets register.
	1.2 Agencies can demonstrate that of each critical data asset's identified data custodian is responsible for data quality management, including: - assisting in assessing data, and developing data quality management plans and data quality statements - documenting deviations from plans - confirming the status of data quality statements for critical data assets in the information asset register - ensuring processes meet internal data quality standards, guidelines and policies.
	1.3 For each identified critical data asset, agencies have: - prepared a data quality statement - developed and maintained a data quality management plan - assessed the quality of the data asset at least annually.

Our methods As part of the review we:

- conducted document reviews
- relied primarily on what agencies told us about including all critical data assets in their information asset registers.

Level of assurance

In an assurance review, we primarily rely on the agency's representations and internally generated information to form our conclusions. By contrast, in a performance audit, we typically gather evidence from an array of internal and external sources, which we analyse and substantiate using various methods. Therefore, an assurance review obtains a lower level of assurance than a performance audit (meaning we have slightly less confidence in the accuracy of our conclusion).

Compliance We conducted our review in accordance with the *Audit Act 1994* and ASAE 3500 *Performance Engagements* to obtain limited assurance to provide a basis for our conclusion.

We complied with the independence and other relevant ethical requirements related to assurance engagements.

Cost and time The full cost of the review and preparation of this report was \$310,000.

The duration of the review was 7 months from initiation to tabling.

Auditor-General's reports tabled in 2024–25

Report title	Tabled
<i>Results of 2023 Audits: Technical and Further Education Institutes</i> (2024–25: 1)	July 2024
<i>Building a Capable and High-performing Public Service Workforce</i> (2024–25: 2)	August 2024
<i>Protecting the Biosecurity of Agricultural Plant Species</i> (2024–25: 3)	October 2024
<i>Responses to Performance Engagement Recommendations: Annual Status Update 2024</i> (2024–25: 4)	October 2024
<i>Auditor-General's Report on the Annual Financial Report of the State of Victoria 2023–24</i> (2024–25: 5)	November 2024
<i>Fair Presentation of Service Delivery Performance 2024</i> (2024–25: 6)	November 2024
<i>Staff Wellbeing in Fire Rescue Victoria</i> (2024–25: 7)	November 2024
<i>Reporting on Local Government Performance: Follow-up</i> (2024–25: 8)	February 2025
<i>Major Projects Performance Reporting 2024</i> (2024–25: 9)	February 2025
<i>Managing Disruptions Affecting Victoria's Public Transport Network</i> (2024–25: 10)	March 2025
<i>State Trustees' Financial Administration Services</i> (2024–25: 11)	April 2025
<i>Recycling Resources from Waste</i> (2024–25: 12)	April 2025
<i>Results of the 2023–24 Audits: Local Government</i> (2024–25: 13)	April 2025
<i>Domestic Building Insurance</i> (2024–25: 14)	May 2025
<i>Quality of Victoria's Critical Data Assets</i> (2024–25: 15)	May 2025

All reports are available for download in PDF and HTML format on our website at <https://www.audit.vic.gov.au>

Our role and contact details

The Auditor-General's role

For information about the Auditor-General's role and VAGO's work, please see our online fact sheet [About VAGO](#).

Our assurance services

Our online fact sheet [Our assurance services](#) details the nature and levels of assurance that we provide to Parliament and public sector agencies through our work program.

Contact details

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