

Data Governance Standard

Standard owner: Chief Operating Officer
Standard approver: Executive Committee
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Document owner: Managing Director, Data Management Office.

1. Purpose

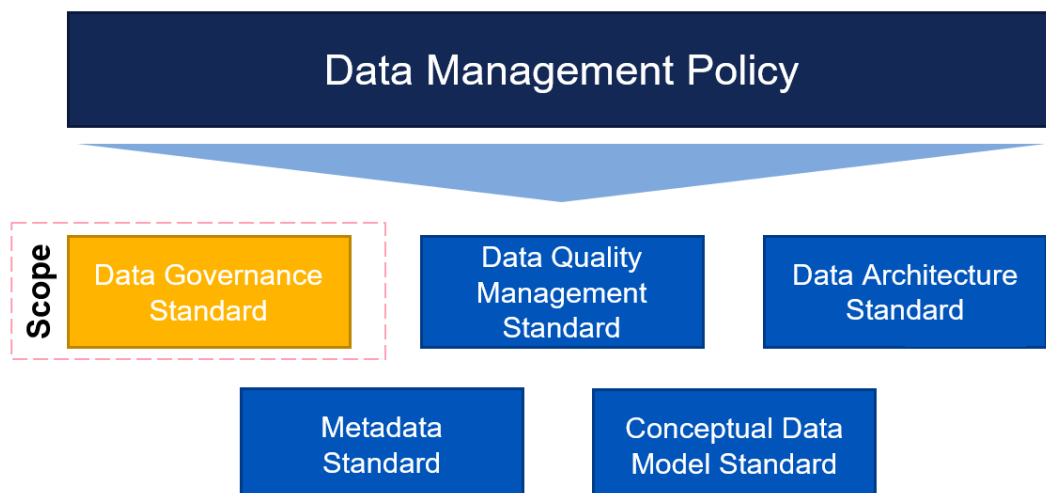
1.1 Purpose

Data Governance is the exercise of authority and control to ensure that trusted information is used for critical business processes. It provides the set of capabilities to define ownership, stewardship, custodianship, and operational structure to ensure that data is managed as a critical data asset and maintained in an effective and sustainable manner with risk understood and managed.

The adoption of this standard is mandatory to ensure that the implementation of the Data Management Policy in relation to Structured Data (“the Policy”) is carried out appropriately and consistently across product teams and central functions at BBB.

This document covers the following aspects:

- **Data Governance Model and its structure, highlighting interaction channels between the governance oversight bodies, the Data Management Office (DMO) and data governance role holders.**
- **Key accountabilities and responsibilities that need to be followed by the DMO team members and data governance role holders.**



2. Scope

This Policy and the associated Standards, apply to all BBB entities, operations, subsidiaries, and Colleagues (see Appendix A Policy Scoping, Policy Governance Framework for definitions) and interactions with Structured Data (“data”), from origination to processing, reporting and analytics.

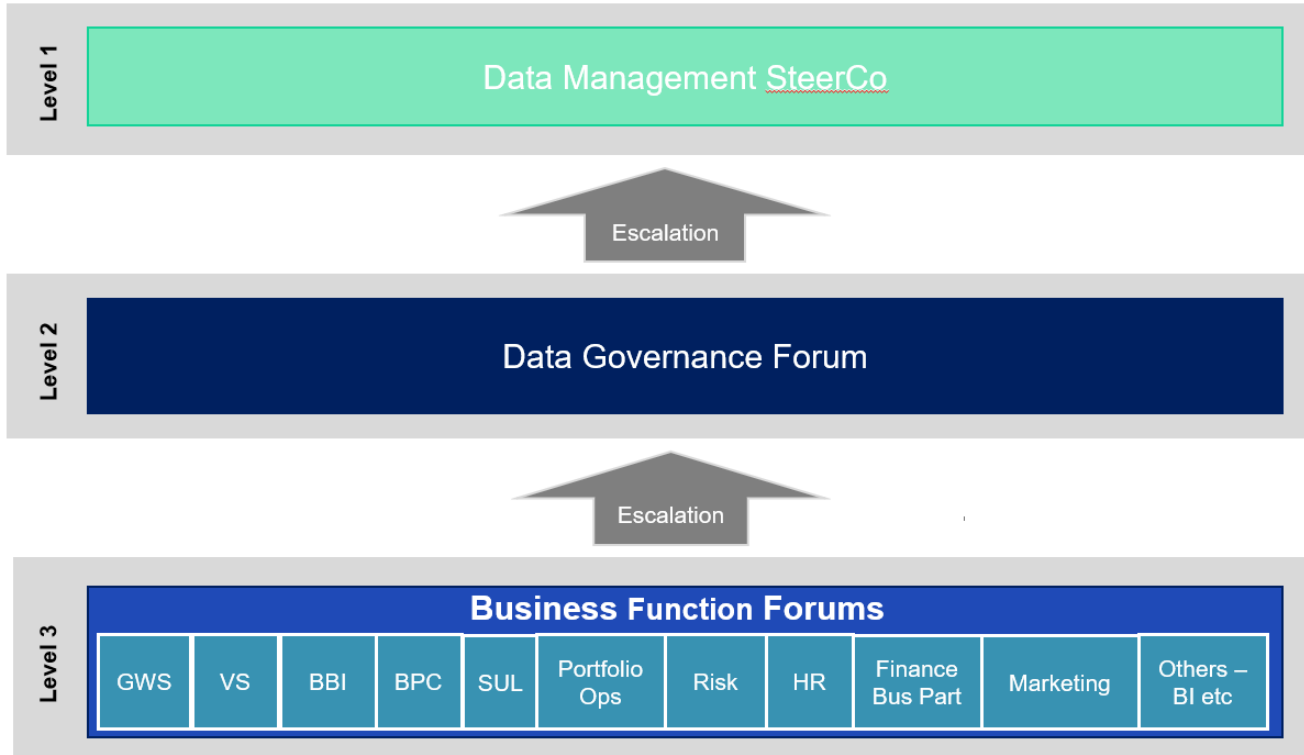
Note: The Bank’s Data Protection Policy and Information Security policies relate to issues of data protection and security, therefore are not covered in the Policy.

3. Key Requirements

3.1 Data Governance Model and Structure

There are three levels of forums / working groups that need to be established to enable decision making:

GOVERNANCE AND OVERSIGHT BODIES



3.1.1 Data Management SteerCo

The Data Management SteerCo provides priorities, sponsorship, resources and strategic oversight to drive the implementation of BBB's data strategy and adoption of the Data Management Policy.

Frequency	Chair	Attendees	Agenda
Monthly	Chief Operating Officer (DM Policy Owner)	<ul style="list-style-type: none"> ExCo Members MD, Data Management Office IT Delivery Leads Risk Leads DMO Leads as required Data Owners as required 	<ul style="list-style-type: none"> Progress against the strategic plans and project milestones Tracking against key metrics and control indicators. Significant risks, control failures, issues and dependencies Financial tracking and resource demands

3.1.2 Data Governance Forum:

The Data Governance Forum has representation from the business areas, functions and Data Management Office (DMO), and escalates appropriate concerns to the Data Management SteerCo as needed. The forum monitors the operational implementation of the Data Management Policy, provides approvals for supporting standards and provides prioritisation and decision making around data governance initiatives and escalated data issues.

Frequency	Chair	Attendees	Agenda
Monthly	Head of the DMO (or the Data Governance Director in their absence)	<ul style="list-style-type: none"> • Data Stewards • Data Owners to attend as required • Data Management Office members as required • Participants and delegates to support focus topics. 	<ul style="list-style-type: none"> • Status updates by business function leads • RAID & escalation • Review Data Management activities across the business functions & agree priorities. • Approvals, prioritisation, and decision making around data governance initiatives • Tracking against key metrics on adoption and compliance with the Policy and Standards • Tracking dashboard results of data quality and issue management service levels.

3.1.3 Business Function Forums:

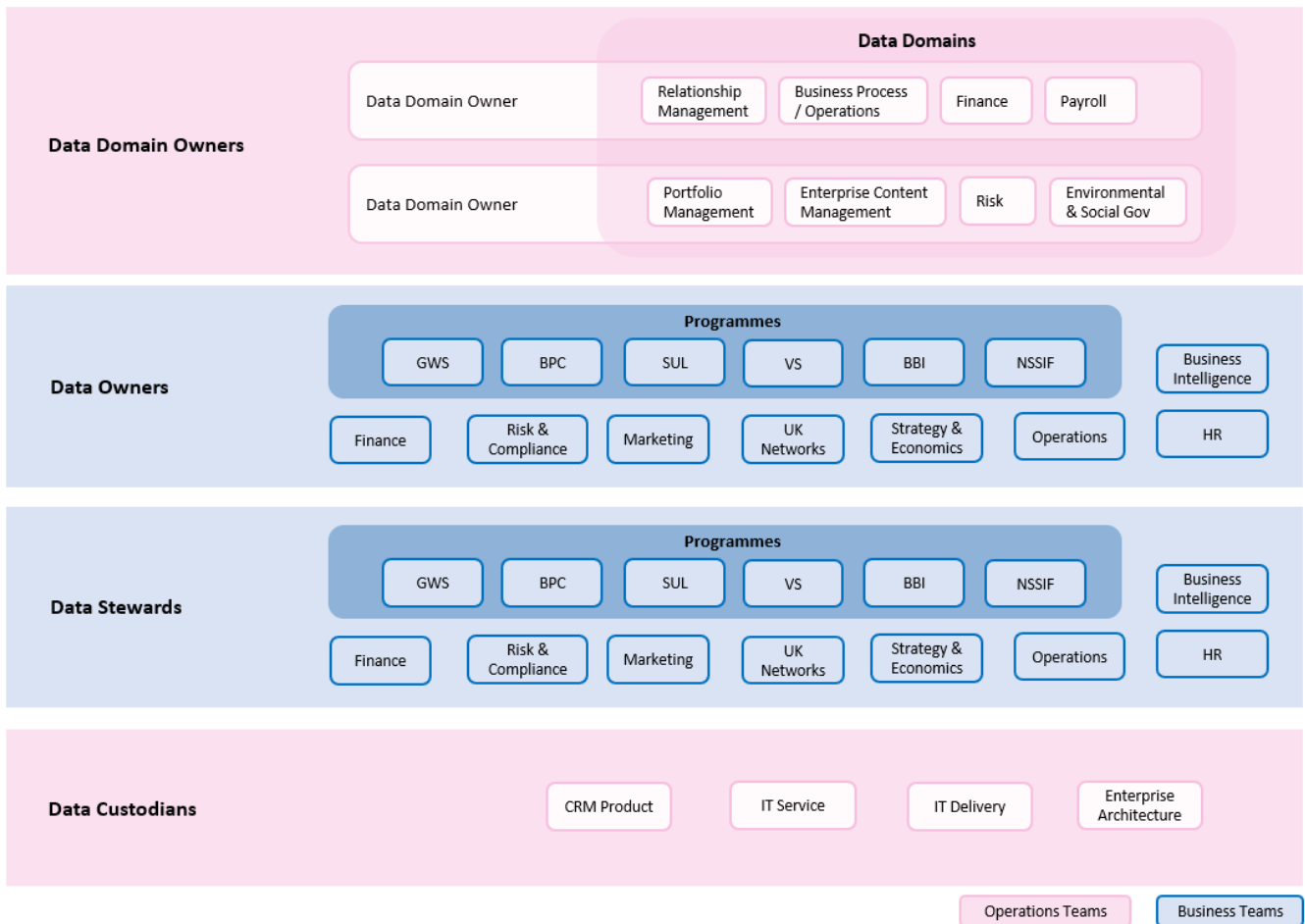
Each business area and function must incorporate data as a standing topic at an appropriate forum attended by the Data Owner. They must ensure that there is appropriate oversight, monitoring and escalation around Data Management Policy compliance, progress of data governance initiatives issues.

Attendees	Agenda
<ul style="list-style-type: none"> • Data Owner • Data Stewards specific to the business function • Data Management Office team members as required. 	<ul style="list-style-type: none"> • Status updates and priorities • Risks, Issues and Dependencies Actions • Data Quality Metrics & Issue Management • Review of milestones and deliverables • Tracking against key metrics on adoption and compliance with the Policy and Standards

4. Roles and Responsibilities

To **have clear accountability for data** and deliver it reliably, the following data governance roles and responsibilities are defined. While ultimate responsibility as per the Policy may lie with one area/person, there is a need for **cooperation and coordination between the areas/persons** to ensure the data governance standard requirements are met.

The figure below provides illustrative roles construct, i.e., how the DMO and data governance roles will be organised and assigned across the bank.



4.1 Data Management Office

Role and Accountability/ Responsibility

The Data Management Office is empowered by the Data Management SteerCo to define data management strategies and drive data governance priorities with the goal of establishing a robust data management capability to govern BBB data, and enabling BBB to meet their objectives through a simplified data architecture and delivering valuable business insight.

Managing Director, Data Management Office is:

- **Accountable** for defining the Data Management Policy.
- **Responsible** for providing the tools and services to enable product teams and central functions with their data management responsibilities.
- **Responsible** for providing guidance and support with the identification of appropriate governance role holders.
- **Accountable** for chairing and facilitation of the Data Governance Forum.

Data Governance Director is:

- **Accountable** for defining the data governance strategies and drive priorities.
- **Responsible** for providing guidance on the implementation of the Policy requirements including standards, guidelines and execution methodologies as appropriate.
- **Responsible** for monitoring compliance with the Data Management Policy and Standards.

Data Quality Senior Manager is:

- **Responsible** for the production of Data Quality KPI metrics and reporting.
- **Responsible** for monitoring compliance with the Data Management Policy and Standards within their capability.

Data Management Design and Modelling Director is:

- **Responsible** for monitoring compliance with the Data Management Policy and Standards within their capability.

4.2 Data Domain Owner

Role and Accountability/ Responsibility

Data Domain Owners are Data Management Professionals assigned by the Data Management Office to oversee one or more data domains. They are responsible for modelling, setting standards and approving definitions for data aligned to their data domain(s). They are involved in the change management process, challenging inputs in the Data Assessment Questionnaire, and attending and providing approval at relevant architecture and technology forums.

Governance:

- **Responsible** for working with Data Owners on defining strategy for their data domain(s).
- **Responsible** for approving the definition of a business term / data element.
- **Responsible** for approving the mapping of data domains to data source(s) and approving the designation of System of Ingestion / Record // Insight /
- **Responsible** for providing oversight over registration and management of metadata in the metadata repositories, including approving updates where required.
- **Responsible** for reviewing responses to the Data Assessment Questionnaire and providing approval for new change initiatives.
- **Responsible** for participating in the Architecture Review Board and Technology Delivery Working Group and providing approval where required.

Data Quality Management:

- **Responsible** for supporting the Data Steward in capturing requirements for definition of data profiling checks, additional data quality rules and controls associated with a specific data domain.

- **Accountable** for providing oversight and guidance on threshold allocation for each data quality rule.
- **Accountable** for providing oversight and guidance on threshold allocation for each data quality control.
- **Responsible** for performing periodic reviews of all data quality rules and, where applicable, challenging the data quality rules for efficiency and alignment with intended outcomes for business function processes.
- **Responsible** for conducting regular review of control effectiveness with Data Steward and Data Quality Analyst.

Data Architecture:

- **Responsible** for approving the mapping of data domains to data source(s) and approving the designation of System of Ingestion / Record / Engagement / Insight / Control.
- **Responsible** for reviewing Data Assessments produced during change activities.
- **Responsible** for participating in the Architecture Review Board, Technology Request Forum, Technology Delivery Working Group and Change Advisory Board to ensure proposed changes are appropriately evaluated against the data architecture principles.

Metadata:

- **Responsible** for reviewing and challenging of the designation of critical for data elements.
- **Responsible** for coordinating with Data Owners and Data Stewards to fully register and manage metadata in the metadata repositories.
- **Responsible** for reviewing and approving metadata, and if approved, updating metadata in the repositories, as required.
- **Accountable** for identifying the change(s) in metadata and collaborating with the Data Owners for reviewing, approving and updating the metadata repositories.
- **Accountable** for working owners of systems / stakeholders for verifying data concepts and identifying golden sources.

Conceptual Data Model:

- **Responsible** for development of data models and mapping data models to application(s).
- **Responsible** for updating data models.
- **Responsible** for approving data models.

4.3 Data Owner

Role and Accountability/ Responsibility

Data Owners are business area or function leaders. They attend the Data Governance Forum to support discussions and supported by Data Stewards as required.

Governance:

- **Accountable** for compliance with the Data Management Policy within their business area.
- **Accountable** for authorising access to data produced within their business area, whilst ultimate authority for decisions on access to data within BBB sits with the Data Governance Forum.
- **Responsible** for the assignment of Data Stewards within their business area and providing them with proper resources and support.
- **Responsible** for incorporating data as a standing topic at the Business Function Forum.
- **Responsible** for ensuring appropriate representation for their business area at the Data Governance Forum and escalation of data related issues as required.

Data Quality Management:

- **Responsible** for escalating data issues to the Data Governance Forum.

Metadata:

- **Accountable** for identifying and notifying the DMO of business process changes.
- **Accountable** for verifying that trusted sources are identified in the business processes and designated in the metadata.
- **Responsible** for approving the changes to data lineage and communicating these changes to the applicable member(s) of the DMO.
- **Accountable** for identifying the change(s) in metadata and collaborating with the Data Domain Owners for reviewing, approving and updating the metadata repositories.

4.4 Data Steward

Role and Accountability/ Responsibility

Data Stewards are data-literate individuals identified by the Data Owner as the person who understands the data (e.g. data flows, critical data items) within a business area / function.

Governance:

- **Responsible** for attending the Data Governance Forum to represent their business area / function.
- **Responsible** for ensuring control and monitoring of data quality and reporting back to the Data Owner on all activities including, compliance, issues, changes, fixes and third-party changes.
- **Responsible** for investigating data issues and driving additionally investigation through to resolution and escalating to Data Owners as required.
- **Responsible** for monitoring compliance with the Data Management Policy and Standards.
- **Responsible** for identifying and cataloguing critical data.

Data Quality Management:

- **Responsible** for working with the Data Domain Owner on capturing requirements for definition of additional data quality rules and controls associated with a specific Data Domain.

- **Accountable** for reviewing data profiling results regularly and ad-hoc reviews when one or more trigger events are encountered:
 - o Trend analysis of data quality indicates a shift in the underlying data.
 - o Changes in business function processes resulting in a change in data architecture.
 - o A new data source is introduced.
- **Responsible** for working with Data Quality Analyst on capturing data quality rules based on 'fit for purpose' requirements pertinent for the business function process.
- **Responsible** for supporting the Data Domain Owner for reviewing data quality rules and control effectiveness.
- **Responsible** working with the Data Quality Analyst on capturing control requirements.
- **Responsible** for being the Action Owner for current action against issue captured by the DQIM (this will usually be you or the Data Custodian, determined by the issue status).

Data Architecture:

- **Responsible** for identifying and proposing the designation of System of Ingestion / Record / Engagement / Insight / Control within their business area.
- **Responsible** for supporting the completion of data assessments for changes related to their business area (in conjunction with change management and Data Architects assigned to change initiatives where relevant).
- **Responsible** for identifying and cataloguing critical data contained within designated data sources owned by their business area.

Metadata:

- **Accountable** for capturing and maintaining the metadata from the business process.
- **Accountable** for identifying and proposing data elements from the business processes that must be designated as critical.
- **Accountable** for reviewing any discrepancies identified by the DMO and collaborating with Data Custodians to follow mitigation strategies to remediate the impacted data sources.
- **Responsible** for verifying that controls are in place to comply with the trusted source methodology.
- **Accountable** for documenting the system lineage related to a business process they steward.
- **Accountable** for identifying the change(s) in metadata and notifying the Data Domain Owners and Data Owners for reviewing, approving and updating the metadata repositories.
- **Accountable** for determining if the proposed change(s) will have any adverse consequences and checking that rules are adhered to (such as mandatory fields being populated, any other rules and restrictions are adhered to, etc.).
- **Responsible** for facilitating the coordination with technology in creating and implementing the data lineage toolset within BBB's environment, managing technical metadata in alignment and coordinating data lineage tasks and testing activities.

- **Responsible** for reviewing the changes to data lineage and communicating these changes to the Data Owner.

Conceptual Data Model:

- Supports Data Management Design & Modelling Director and Data Domain Owner with development of data models.

4.5 Data Custodian

Role and Accountability/ Responsibility

Governance:

- **Responsible** for data access provisioning in line with the governance and access requirements.
- **Responsible** for supporting data quality issue root cause analysis and issue remediation.
- **Responsible** for implementing data controls in line with the Data Management Policy and Standards requirements, e.g., detective data quality rules and preventative data quality controls such as input validation.
- **Responsible** for maintaining appropriate system documentation in line with the Data Management Policy and Standards requirements, e.g., data dictionary.

Data Quality Management:

- **Responsible** for implementing data quality rules and controls.
- **Responsible** for proposing the final solution design for the data issue and involved in implementing the execution and delivery of the solution.

Data Architecture:

- **Responsible** for implementing data controls for designated data sources in line with the standards requirements, e.g., detective data quality rules and preventative data quality controls such as input validation.
- **Responsible** for maintaining appropriate system documentation for designated data sources in line with the standards requirements, e.g., data dictionary.

Metadata:

- **Responsible** for working with technology in deploying the data lineage tools for scanning data, establishing connections and capturing lineage using data lineage toolset while documenting technical lineage.
- **Responsible** for coordinating with technology in creating and implementing the data lineage toolset within BBB's environment, managing technical metadata in alignment and coordinating data lineage tasks and testing activities.
- **Responsible** for reviewing the changes to data lineage and communicating these changes to the applicable member(s) of the DMO.

- **Responsible** for verifying that controls are in place to comply with the trusted source methodology.
- **Responsible** for coordinating with technology in creating and implementing the data lineage toolset within BBB's environment, managing technical metadata in alignment and coordinating data lineage tasks and testing activities.
- **Responsible** for coordinating with technology in creating and implementing the data lineage toolset within BBB's environment, managing technical metadata in alignment and coordinating data lineage tasks and testing activities.
- **Accountable** for reviewing any discrepancies identified by the DMO and follow mitigation strategies to remediate the impacted data sources.

5. Further Reading

Further reading: Data Management Policy.

6. Policy Controls

Controls in place regarding this policy are as follows:

Control Reference	Control Title	Description	Frequency
DM-001	Data Governance Roles	All business areas must assign a Data Owner and Data Steward. All systems must have an assigned Data Custodian. Each data domain must have an assigned Data Domain Owner.	Continuous
DM-002	Critical Data Elements (CDE) Identified and Under Governance	Critical Data Elements (CDEs) are data elements used for making business decisions that have an impact on the bank's financial performance, results, or bottom line. This control requires that CDEs must be defined and grouped within the business objects hierarchy with associated metadata, data sources, lineage and governance roles recorded and maintained.	Continuous
DM-003	Preventative Data Quality	Preventative data quality controls (e.g. input validations) must be implemented for critical data elements.	Continuous
DM-004	Detective Data Quality	Detective data quality controls (data quality measurement) must be implemented for critical data elements.	Monthly
DM-005	Issue Management	A data quality issue management process is in place.	Monthly
DM-006	Systems of record	System of Record is where the data is screened, managed, updated, deleted or mastered, validated and where exceptions are remediated. This control requires that each CDE has a designated system of record (which cannot be an end-user repository) with appropriate controls, where the data is managed, updated, deleted or mastered, validated and where exceptions are remediated.	Continuous

DM-007	Data Assessment as part of Change Initiatives	Data Assessments must be performed as part of the evaluation and design of changes and solutions to ensure data architecture principles are followed.	Continuous
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7. Definition of Terms

Term	Definition
BBB or the bank	The British Business Bank plc (“BBB” or “the bank”) and its subsidiaries.
Colleagues	Permanent Employees, Fixed Term Contract, Apprentices, Interns, Secondees-out, Secondees-In, Board Members, Non-Executive Directors, Contractors, Temps and Professional Services.
Critical Data Element (CDE)	“CDE” is a common term which refers to a Data Element that has been deemed critical. Where there is an enhanced governance standard, such as that driven by a regulatory program, an appropriate identifier needs to be applied to the CDE(s) reporting and compliance purposes. The definition of any such enhanced requirements, e.g., consumer data testing and front-to-back (FTB) lineage, will be driven and owned by the sponsoring Division or Corporate Function.
Data Availability	Means that authorised users can access the BBB’s Data when they need it for authorised purposes.
Data Integrity	Means that BBB’s data is accurate and suitable for the purpose for which it is processed.

Version control

Version Date	Author	Description	Approved by	Date approved	Date published
11/06/2021		First Draft			
22/10/2021	██████	Version 1.0 Final Approved by BBB Board on 22 October 2021	BBB Board	22/10/2021	11/11/2021
22/02/2023	██████	Version 2.0 DRAFT for PRG Annual Policy Review			

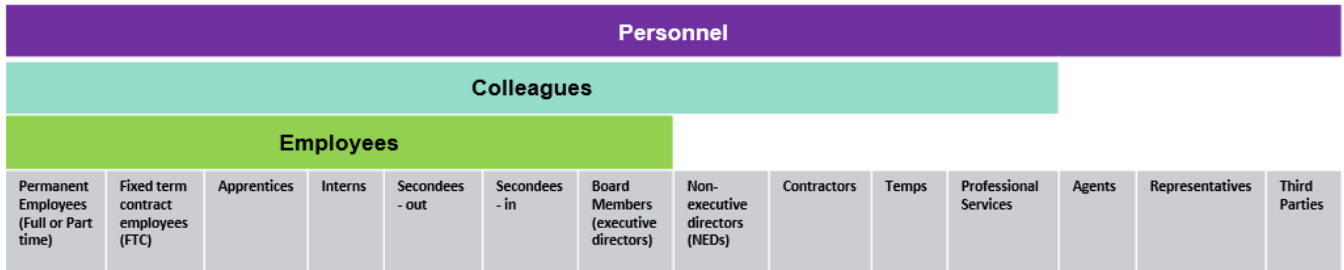
Appendix 1 - Policy Scope Categories

Accurate policy scoping is important to ensure that those who might be affected by a policy are identified and considered.

The proposed approach is to capture all potential individuals and entities that could fall within scope of a BBB policy into 3 distinct categories:

- Personnel
- Colleagues
- Employees

Policy owners will be responsible for identifying which category is applicable to their policy.



The Policy Governance Framework will capture the detailed list of which individuals fall within each category for reference. (Slide 3).

Policy Scope wording:

This policy applies to all BBB entities, operations and **Personnel**.

This policy applies to all BBB entities, operations and **Colleagues**.

This policy applies to all BBB entities, operations and **Employees**.