



# وثيقة تحليل الفجوات للسياسات والضوابط والقواعد الاسترشادية الخاصة بإدارة البيانات وحوكمتها وحماية البيانات الشخصية





## جدول المحتويات

اعتماد الوثيقة.....	4
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## الإصدارات

النسخة	التاريخ	وصف الإصدار
1.1V	13/11/2024	اصدار مكتب إدارة البيانات

## اعتماد الوثيقة

الإسم	المنصب الوظيفي	تاريخ الاعتماد	التوقيع
حصة بن ملافخ	المدير العام لمكتب البيانات	-----	-----

## تحدي

### DG.2.1

To support implementation of the Entity's Data Management and Personal Data Protection Strategy, the Entity shall conduct a Data Management and Personal Data Protection Policy and Guidelines gap analysis, including, at minimum, the following:

1. An analysis of the National Data Management and Personal Data Protection Program's Policies, Standards, and Guidelines
2. Identification and analysis of all data related standards and policies currently published by the Entity or the Regulator of the sector to which the Entity belongs to
3. An analysis of the internal Entity-specific requirements for Data Management and Personal Data Protection Policies and Guidelines
4. A Data Management and Personal Data Protection Policies and Guidelines development plan that clearly indicates the timeline for implementation.

#### **Explanation:**

1&2—Careful analysis was undertaken to gauge the policies mandated by the National Data Management Office (NDMO). By consulting NDMO Regulations v1.5 issued in 2021 and National Data Governance Interim Regulations V1 issued in 2020.

3&4 — Since all identified policies are applicable on SCFHS (Saudi Commission for Health Specialties), a Gap Analysis was performed to see, what policies are available and are they latest or missing specific requirements.

Existing and missing policies were identified and also a need to update the existing policies with timelines for policy drafts, internal deliberations and approval and implementation.

Plan with Timeline was presented to management for approval in August 2024. Screenshot of email as below;



RE: General Department of Institutional Excellence - DMO Polices request

SH Sharouk H. Baker <s.baker@scfhs.org.sa>  
To: Ali, Zeeshan (Ascend)  
Cc: Hessah K. Bin Mulafikh; Soliman, Ahmed (Ascend); Alamoudi, Abdullah (Ascend); AlHathloul Nouf (Ascend)

From: Ali, Zeeshan (Ascend) <zeeshan.ali@ascend.com.sa>  
Sent: Wednesday, August 7, 2024 6:58 PM  
To: Sharouk H. Baker <s.baker@scfhs.org.sa>  
Cc: Hessah K. Bin mulafikh <h.binmulafikh@scfhs.org.sa>; Soliman, Ahmed (Ascend) <Ahmed.Soliman@ascend.com.sa>; Alamoudi, Abdullah (Ascend) <Abdullah.Alamoudi@ascend.com.sa>; AlHathloul Nouf (Ascend) <Nouf.AlHathloul@ascend.com.sa>  
Subject: RE: General Department of Institutional Excellence - DMO Polices request

Dear Sharouk,  
Please find below the timeline for policies. I am available for further discussion if needed.

Sr.	Policy Name	First Draft Timeline	Final Version Timeline
1	Data Management and Personal Data Protection Policy and Guidelines	18 <sup>th</sup> August 2024	18 <sup>th</sup> Sep 2024
2	Data Classification Policy	25 <sup>th</sup> August 2024	25 <sup>th</sup> Sep 2024
3	Document and Content Management Policy	08 <sup>th</sup> Sep 2024	08 <sup>th</sup> October 2024
4	Data Sharing Policy	08 <sup>th</sup> Sep 2024	08 <sup>th</sup> October 2024
5	Freedom of Information Policy	08 <sup>th</sup> Sep 2024	08 <sup>th</sup> October 2024
6	Open Data Policy	15 <sup>th</sup> Sep 2024	15 <sup>th</sup> October 2024
7	Data Architecture and Modelling Policy	22 <sup>nd</sup> Sep 2024	22 <sup>nd</sup> October 2024
8	Storage and Retention Policy	29 <sup>th</sup> Sep 2024	29 <sup>th</sup> October 2024
9	Data Governance Framework	30 <sup>th</sup> Sep 2024	31 <sup>st</sup> October 2024

Regards,  
Zeeshan

### Existing Policies identified:

1. Freedom of Information Policy
2. Data Classification Policy
3. **Data Management and Personal Data Protection Policy and Guidelines**
4. Data Sharing Policy
5. **Document and Content Management Policy**

### Missing Policies:

1. Open Data Policy
2. **Storage and Retention Policy**
3. **Data Architecture and Modeling Policy**

In Addition to that, we decided to have a “Data Governance Framework” to set rules for anything else that has not been covered in policy as per NDMO Guidelines and DAMA DMBok guidelines

### Implementation Timelines:

All mandated policies by NDMO will be implemented and effective by **25<sup>th</sup> December 2024**.

### Reference Evidence:

1. SCFHS-NDMO Gap Analysis MasterSheet
2. Policy Plan Template 0 (version 1)
3. Policy Plan timeline Email screenshot
4. Policy Draft for “Freedom of Information Policy”
5. Policy Draft for “Data Classification Policy”
6. Policy Draft for “**Data Management and Personal Data Protection Policy and Guidelines**”
7. Policy Draft for “Data Sharing Policy”
8. Policy Draft for “**Document and Content Management Policy**”
9. Policy Draft for “Open Data Policy”
10. Policy Draft for “**Storage and Retention Policy**”
11. Policy Draft for “**Data Architecture and Modeling Policy**”