

WHITE PAPER

# Federated Data Governance Model

Critical path for organization data maturity transformation journey

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Navigating the complex world of data can be quite a challenge for today's businesses. A flexible approach known as federated data governance is becoming a game-changer, helping companies deal with this complexity much more efficiently. Moving away from a one-size-fits-all system, this method allows each part of a business to handle data in a way that makes sense for them, while still keeping everything coordinated.

Putting this into action isn't a one-step process. It takes careful planning and a willingness to adjust as you go. Companies have to be smart about not spending too much on tools that don't offer enough in return, and they need to be ready to adapt to new rules and regulations that are always cropping up.

For a federated data governance plan to work well, it's essential to connect the dots between the different ways that a company works with data, bringing together the best of both specialized and centralized teams. This means getting the right people involved to guide these efforts and make sure they're working towards the same goals.

Because data is so important, any changes to how it's handled must be managed carefully. It's crucial to get everyone on board with these changes, from the get-go. This is especially true when working across borders, where different countries may have different ways of doing things.

## **Executive Summary**

ederated data governance design is crucial if organizations are to achieve data mesh implementation success. For many, knowing where to start and how to determine the level of federation presents difficulties. We have conducted multiple federated data governance design projects with clients, which have equipped us to guide others undertaking similar journeys.

#### The So What:

The increasing amount and complexity of data make it challenging to stay responsive and make informed decisions. Traditional data handling methods are struggling to keep up, especially when it comes to protecting data and sticking to the rules The shift towards a federated data governance model presents a strategic opportunity for organizations to enhance their data management capabilities, enabling them to strike a balance between centralized oversight and decentralized flexibility. This model is crucial for organizations to leverage data as a strategic asset, ensuring data quality, compliance, and accessibility across diverse business units.

The adoption of a federated data governance model can unlock significant value, empowering organizations to respond more swiftly to market changes, regulatory requirements, and technological advancements. It fosters a culture of data-driven decision-making, enhances operational efficiency, and mitigates risk by establishing clear data ownership and accountability frameworks.

#### Now What:

To capitalize on the benefits of federated data governance, organizations must embark on a comprehensive transformation journey, encompassing:

- **Strategic Alignment:** Ensuring the federated data governance framework aligns with the organization's broader strategic objectives, data architecture, and digital transformation goals.
- Operational Execution: Implementing robust mechanisms for data quality management, privacy, and security within the federated model, alongside the development of scalable infrastructure that supports agile data sharing and collaboration.
- **Cultural and Organizational Change:** Cultivating a data-centric culture that values governance as a foundational element of business success, fostering collaboration between IT and business units to drive ownership and accountability.
- **Regulatory Adaptation and Innovation:** Proactively adapting to regulatory changes and leveraging governance as a platform for innovation, ensuring that data practices comply with current regulations and anticipate future governance trends.
- **Data Platform creation & Integration:** Establishing a supportive data platform is crucial. This platform must be flexible enough to accommodate the distinct needs of different data domains while ensuring seamless integration, robust performance, and compliance across the organization.

By proactively addressing these areas, organizations can ensure that their federated data governance model not only meets the current demands of data management, but also positions them to leverage data as a key driver of innovation, competitive advantage, and regulatory compliance.

# Section 1: Federated data governance can be the crucial solution to navigate complexity of external and internal structure.

#### Data governance has long been seen as a centralized powerhouse

raditionally, organizations have leaned towards a centralized structure in data governance. They valued their ability to streamline decision-making and maintain a center of excellence for employees with desired data skills (e.g., data engineer). A 2021 Gartner report highlighted a finding that over 60% of large enterprises relied on centralized data governance models to mitigate risk and ensure regulation compliance.

While centralized data governance has been the traditional backbone for many organizations, aiming for uniformity in decision-making and compliance, it faces tangible challenges in today's data-driven environment:

- **Regulatory Compliance:** With laws like the GDPR in Europe, which imposes strict data handling requirements, and varying others across the globe, a one-policy-fits-all approach can lead to compliance blind spots and increased legal risks.
- **Integration Issues:** Centralized systems often struggle to seamlessly integrate with the variety of modern and legacy data systems found within an enterprise, leading to data silos and inefficiencies.
- **Scalability:** Centralized models can be rigid, making it difficult to scale operations quickly in response to new business needs or technological advancements.
- **Change management:** A move towards centralized governance can be met with resistance from employees used to decentralized autonomy, leading to implementation roadblocks.

The challenges highlight the need for an adaptable framework that can cater to the distinctive needs of various business units while still upholding overarching data standards and policies.

In particular, organizations at the lower end of the data maturity spectrum require a centralized data governance model to establish a strong foundation. According to BCG DAC-AMA (Data capability maturity assessment survey), the overall index for data management improved 15% over previous results. The biggest gains were seen in building foundational capabilities in data governance, resulting in improved data quality and more consistent decision-making.

Centralized data governance, when implemented properly, ensures an effective, structured approach to building a solid data foundation, which is essential for successful organization transformation. The governance structure often establishes accountability, which is essential to decision-making and compliance (e.g., GDPR, Basel III, or SOX).

#### Market shifts from centralized to Data Mesh and decentralized governance for sustained business context

Organizations with complex structures and multiple subsidiaries often face significant obstacles when it comes to data inaccuracy and compliance risks. Data governance maturity assessments also prove highly challenging for players in this category. The data risks, if not properly handled, have the potential to cause reputational harm and financial losses.

In large organizations, where business units have distinct value propositions and ways of working, these challenges are magnified. Different priorities and approaches to data management across departments, like asset management versus savings and insurance, necessitate a more nuanced governance model.

The concept of data mesh was articulated around 2019, gaining widespread popularity due to its suitability for handling complex and rapidly evolving business requirements. Data mesh offers a solution to these challenges by advocating for decentralized data domains. This approach places greater accountability and responsibility on domain owners, aligning data management more closely with business needs and operational contexts.

The transition to a decentralized domain-driven data governance model is supported by the need to tailor governance priorities to domain-specific business contexts. In principle, data mesh or de-centralized governance models can ensure data management practices create business value swiftly, and effectively manage business risk.

#### Data governance design should be approached as a spectrum, tailored to each organization's unique context

De-centralized data governance models are not right for all organizations, especially when different practices lead to different versions of truth and many other challenges. This often occurs in organizations with insufficient data maturity, where decentralized approaches exacerbate inconsistencies and inefficiencies in data handling.

With this in mind, there is no one size fits all method for achieving governance structure and the implementation of corresponding operational models. Each organization operates in a different context based on its market, industry and size, requiring different approaches when implementing federated data governance models.

Broadly speaking, elements like data standards, central regulation policies and compliance requirements can be centralized for consistency, meanwhile, other aspects like data curation and data processing tasks can benefit from domain driven governance structures. Size, data maturity, and types of practices are also factors that may influence the aspects of data governance that an organization chooses to centralize. In the context of multinational operations where local data standards are deeply embedded in legacy systems, a strict centralized governance model may not be the best fit. Instead, adopting a federated approach can offer the flexibility required to navigate the varied landscape effectively.

Centralized components, like overarching data standards and compliance requirements, ensure uniformity and facilitate reporting and analytics at a global level. Meanwhile, allowing local domains to curate and process data according to their regional standards respects the established systems and regulatory requirements.

An effective tailored approach to federated data governance that benefits the organization calls for careful, strategic design. Federation represents a spectrum of governance choices, meaning that the organization should consider the decentralized position of each practice based on its context. Meanwhile, the governance model should also reflect changes relating to senior stakeholders, accountability and implications for ways of working.

# Section 2: A detailed howto guide - The design and implementation of a federated data governance model is an iterative and nuanced process

#### Organizations often start their data journey by investing heavily in tooling with low ROI

oday, companies know data is key, no matter what field they're in. They invest significantly in technology solutions like online storage and tools to understand data, thinking that doing so will generate value directly. But often, few get the benefits they hoped for.

The belief that technology alone can unlock data's full potential may stem from the rapid advancements in data solutions and their new market proposition. Companies see data as technology enablement and a quick fix, influenced by insufficient understanding of the challenge. This perspective is further fuelled by the industry's emphasis on the capabilities of their data offerings, often highlighting ease of use and integration, suggesting that these tools alone can lead to significant improvements in efficiency and decision-making.

Organizations often fail to fully benefit from new technology because employees are not prepared to adopt new systems. For instance, a company might introduce a sophisticated data analysis tool, but if the team continues to rely on spreadsheets because, subjectively, they do not find the value new tooling created, the investment doesn't pay off. This gap between availability and its effective use highlights the need for comprehensive training and a cultural shift. Becoming a data-centric organization is essential, because failure to do so will mean that even the most advanced tools can't deliver their intended value. When organizations invest in new technology, success hinges on more than just the tools.

All new investments must be aligned with a robust data governance design and operating model. To achieve effective federated data governance design, organizations must also focus on key success factors relating to people and process.

#### Regulation is accelerating the need for change

To understand the importance of data governance, especially within financial institutions, it's crucial to address the regulatory scrutiny these entities face. These regulations are designed and implemented to maintain fairness and security within the financial system.

Financial institutions must respond swiftly and effectively to any regulatory changes, often within tight deadlines. For example, one of our clients in Europe received a set of requirements relating to external regulation that meant they had to submit a response by Q2 2023. The response had to include a detailed functional data governance model and a plan to conform to the proposed governance model. Our clients only had six weeks to deliver this comprehensive response with only drafts available.

By reacting proactively to these regulatory challenges, organizations can go beyond simply dodging penalties. The key is to create a flexible system that can quickly adapt to updated regulations and standards. By focusing on functional data governance design, financial institutions not only stay on the right side of the compliance, but also enhance their reputation with both regulators and the public. This helps both in terms of meeting requirements and in fostering a trustworthy and reliable financial services environment.

#### We have seen organizations fail their data governance design, requiring proactive steps to manage the challenges

For proper implementation of data governance design, the framework should focus on where key challenges apply in the existing governance structure. Typically, organizations would face the following challenges:

- Complex organization structures: Many organizations have structures where the power and control lie with subsidiaries and additional companies. Each separate entity would face different levels of external scrutiny (e.g., market, regulation), which reflect the way of working and basic requirements for business operations.
- Organization change management and senior leadership accountability: Data is
  central to the clients' business, meaning that changes of domain and governance design
  reflect on the accountability of senior leadership. For example, executive members would
  ultimately be accountable for their target data domain quality in the target state. Additionally, the organization operates in a scaled agile framework where duplication of accountability might happen and require key decisions to be made.
- Apply business context to data initiatives: In order to change the perception that data
  capability is a separate ivory tower, employees impacted by the change should be aware
  of what the new model of working will realistically mean. Understanding what counts as a
  data product, how data products should be re-used, and how data governance committees
  report to the other existing committees are key questions to consider.

In order to combat the common challenges mentioned above, the four key supporting drivers for successful federated data governance models include: data domain (and data product) design, central and data domain organization teams, key data roles and responsibilities, and governance bodies.

#### Data domains should be embedded in the organization with clear business value creation

Data domains serve as essential components for data management within large organizations, and are crucial for structuring and categorizing internal information. However, a significant portion of organizations embarking on data mesh and data domain transformations struggle to realize concrete benefits. This challenge underscores the complexity of effectively implementing these factors to facilitate meaningful data use and decision-making processes.

Organizations often encounter three main hurdles when implementing the concept of data domains. Firstly, data domains, as an organizational framework, tend to intersect with existing structures, such as business unit divisions or the Scaled Agile Framework. This overlap can lead to confusion if not managed properly, leading employees to perceive data domains as theoretical rather than practical tools for adding business value.

Secondly, domains should not be established without senior stakeholders' sponsorship. In the end, the executive board members are accountable for organization success. Data, as the reflection of organization performance and foundation of business value creation, should also be sponsored by the senior leadership. Without accountability and responsibility, data related initiatives are often just viewed as "nice to have."

Lastly, data domains are often created arbitrarily and without a strategic approach. This can lead to domains that aren't suitable for their intended purpose or are overly detailed, resembling data products rather than serving their intended organizational function.

In order to properly manage data domain design, we will walk through the following elements:

- Data domain design principles
- Key success factors for effective data domain design
- · Exemplary decision for data domain mapping
- Data domains in complex organizations

#### Data domain design should follow these principles to ensure effectiveness:

- Data Domains should be MECE (mutually exclusive and collectively exhaustive), meaning they should be distinctly different from one another and collectively encompass all possible data that can be collected.
- Each Data Domain requires an accountable Data Domain Owner, ensuring that fit-for-purpose data in the domain is readily available and distributed in line with relevant policies and standards (e.g., GDPR).
- Data Domains should be balanced in terms of size and complexity.
- Data Domain ownership and accountability should be kept close to the point of data origination as much as possible.
- Data that is changed together must be consolidated together within a single Data Domain.
- Data Domains function as providers and consumers of data to and from other Data Domains. They also facilitate at least one value chain or business process that delivers value to internal or external stakeholders.

#### Beyond the basic principles of data domain design, these key success factors are also foundational:

- Executive committee members should be assigned to one data domain or more.
- Executive committee members should have clear responsibilities and accountabilities, which must be defined and distinct from those of other members, the accountabilities and responsibilities should be formed into Key Performance Index (KPIs)
- Domains should be established to ensure the data they own is consistent and accurate, promoting re-usability of the data products they provide.
- Domains should ensure the ease of use and accessibility of their data. The cohesiveness of data within a Data Domain is a key factor in determining its storage location.

#### Since data domains differ from existing structures, and many organizations use different entities and platforms, the data domain characteristics and implications change accordingly

Key for decomposition	Centrally managed data domain with common data platforms	Centrally managed data domain with multiple data platforms
General characteristics and assumptions	<ul> <li>Domains are defined according to business area specificity.</li> <li>Data platforms are common across the organization and the legal entities.</li> <li>The Data Domain owner is situated in the organization and is accountable for a specific domain across the organization and the legal entities.</li> </ul>	<ul> <li>Data Domains are defined according to the core organization's business area specificity. However, legal entities may capture different or additional data.</li> <li>Data is captured through different data platforms used by the core organization and legal entities.</li> </ul>
Implications	<ul> <li>Data families within domains are the same within the core organization, and legal entities require no additional management on the legal entity side.</li> <li>Requires no additional management of data domains on the legal entity side.</li> <li>Regulation might require someone to be accountable for data within the legal entity. Therefore, someone must be accountable for the data domains.</li> </ul>	<ul> <li>There is direct accountability for managing data domains within the legal entities.</li> <li>Domain principles and guidelines are set centrally and followed by the Data Product Owner (DPO) within the legal entity.</li> </ul>

From our experience and lessons learned from industry best practices, in implementing data domains in financial institutions, the data domain set up can be illustrated as:

Finance and Risk Management	Operations	Products
<ul> <li>Finance Control</li> <li>Operational Risk</li> <li>Group Treasury</li> <li>Market Risk</li> <li>Credit Risk</li> <li>Compliance</li> </ul>	<ul> <li>Clearing &amp; Settlement</li> <li>Counting Services</li> <li>Operational Services</li> <li>Accounting Operations</li> <li>External Agency</li> </ul>	<ul> <li>Market Operations</li> <li>Loans and Deposits</li> <li>Cards</li> <li>Corporate Banking</li> <li>Market Trading</li> <li>Advisory Services</li> <li>Trade Banking</li> <li>Consumer Banking</li> </ul>
Customer	Channels	Resource Management
<ul> <li>Relationship Mgmt.</li> <li>Investment Services</li> <li>Sales</li> <li>Party Reference</li> <li>Customer Care</li> </ul>	<ul> <li>Information Provides</li> <li>Cross Channel</li> <li>Servicing</li> </ul>	Human Resources     Platform Operations     Buildings & Equipment • Unit Mgmt.
• Corporate Relations • Corporate Services • Business Direction	<ul> <li>Business Development</li> <li>IP and Knowledge <ul> <li>Product Mgmt.</li> <li>Channel Mgmt.</li> </ul> </li> <li>Solution Dev. <ul> <li>Marketing and Dev.</li> </ul> </li> </ul>	

Source: BCG Client example, BIAN

#### The central data team should empower data domain success, however, the degree of federation depends on organization maturity

One of the primary challenges in federated data governance design is determining the elements to centralize versus those to allocate to data domains. Ideally, data domains are tasked with driving data value, encompassing data quality and accessibility, while a central data organization focuses on establishing foundational principles and enforcing standards.

However, the strategy for distributing data capabilities and resources should be aligned with an organization's maturity level. For instance, organizations at a low maturity level, characterized by a limited number of data experts and an emerging data culture, might experience delayed value creation and inconsistent adoption of data principles. This is especially likely if data accountability is decentralized. In such cases, forming a robust central data governance Center of Excellence (CoE), and then gradually transferring expertise to domain-specific structures, may facilitate smoother implementation.

This approach becomes complex in highly regulated industries like financial services, where rigorous scrutiny on regulation and compliance necessitates a nuanced balance between central mandates and the accountability of data ownership. In this instance, organizations must carefully assess their unique market and industry contexts to determine the most effective distribution strategy for central and decentralized governance elements.

For example, in a recent client case involving a major European bank, BCG conducted the separation of data domains and Chief Data Officer (CDO) organization. Here is an illustration of the process:

- The Data Domain Organisation will drive data execution for a given data domain bank, key examples of the activities performed are:
- Gather Data Product requirements and deliver a Data Product that is compliant with all relevant rules, local laws, regulations (e.g., GDPR) and priority setting.
- Coordinate the sourcing of (golden) data to a self-service analytics platform.
- Define, review, and agree on data sharing.
- Manage the resolution of data issues (including Data quality resolution).
- Identify advanced analytics specific use cases, including Machine Learning and AI.
- The CDO's mandate is to actively lead Data Strategy, Data Governance, Data Portfolio Management, Data Issue Management, Data Domain Management, Change Management, and Data Management Enablement & Orchestration. Key examples of the activities performed are:
- Gathering Data Product requirements and delivering Data Products that are compliant with all relevant rules, local laws, regulations (e.g., GDPR) and priority setting.
- Manage Data Portfolio across all data domains, including all data initiatives and related priority setting
- Deliver Data Management capabilities (including methodology) and ensure adoption in data domains.
- Ensure data priorities are aligned with bank-wide priorities (including other alignment with other executives).
- Orchestrate Data Issue Resolution.

### Both the data domain team and central data organization depend on the right expertise to maximise value

Organizations often create a wide array of data roles with overlapping duties, leading to confusion and inefficiency. For instance, in some cases, data analysts, data engineers, and data custodians might all find themselves performing tasks typically associated with data visualization experts due to unclear job definitions.

This issue can stem from attempting to meet the unique needs of different business units, or by mimicking job titles prevalent in the industry, resulting in an excessive number of data roles. A scenario where over 30 distinct data positions exist within a single organization would be a prime example.

Furthermore, specific data roles, such as data stewards, which are essential for managing the business aspects of data, often do not receive the appropriate level of time and resource allocation. These roles are frequently considered an additional responsibility, rather than warranting a dedicated full-time position. This undermines their effectiveness when it comes to ensuring robust data management practices.

The necessity for specific data roles varies greatly with an organization's operational model and IT sourcing strategies. For example, organizations that outsource their data platform operations may find less need for extensive data custodian tasks. It's advisable for organizations to carefully review and match roles to their intended operational design. This should be achieved by creating detailed role descriptions to ensure alignment with their needs and objectives.

As a reference, BCG has recently implemented a federated data governance solution with the following roles:

Roles	High-level description	
CDO (Chief Data officer)	is accountable for the Data Strategy, Data Governance, Data Portfolio Management, Data Issue Management, Data Domain Management, Change Management, and Data Man- agement Enablement & Orchestration.	
DDO (Data Domain Owner)	is accountable for data (incl. execution activities of Data Management) in their data domain – ensuring fit-for-purpose data in the domain is readily available and distributed in line with relevant policies and standards.	
DPO (Data product owner)	is responsible for the delivery of a Data Product in a data domain and organizing a Data Product team, considering local rules and regulations, policies and standards.	
Data Steward	is responsible for the business aspects of Data Management – according to all relevant local rules and regulations, policies and standards. They should be knowledgeable on the data they manage.	
Data Analyst	is responsible for deep analysis and delivering visual data insights with recommendations to facilitate decision making — in line with all relevant local rules and regulations, policies and standards.	
Data Scientist	is responsible for advising and executing integral data- driven solutions – in line with all relevant rules and regula- tions (including policies).	
Data Custodian	is an IT engineer assigned to take the responsibility for technical data model design in the scope of a source. They support Data Stewards to resolve data Issues at source, set up DQ Monitoring, and define technical metadata.	
Data Engineer	is an IT engineer assigned to take the responsibility for the technical data exchange design. This encompasses the design of interfaces that enable the transfer of data in and out of a database (as opposed to designing the database itself).	

# To fully operationalize the effective federated data governance domain, governance bodies should set a clear agenda and integrate with other data governance domains

Data governance bodies play a critical role in aligning data initiatives across central and domain levels. Without a well-structured governance framework, there is a significant risk of misaligned priorities, leading to inefficiencies and potential conflicts between departments. This misalignment can result in duplicated efforts, wasted resources, and missed opportunities for data optimization. Furthermore, it can hinder an organization's ability to comply with data regulations, protect data privacy, and secure competitive advantages through data-driven insights, emphasizing the need for a coherent and comprehensive governance structure.

Without proper governance, the lack of coordination not only duplicates efforts, but also strains resources and delays actionable insights. This highlights the operational challenges associated with inadequate governance structures.

In order to address the issues, data governance should be properly set up and integrated with existing governance bodies to align on priorities and resource allocation.

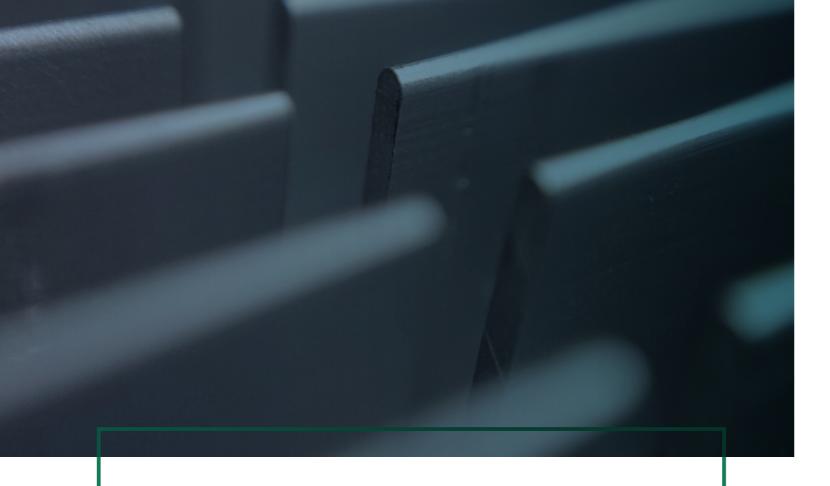
For example, in the recent project BCG conducted with a European bank. We solved the challenges of Data Domain Board (DDB) and the Group Data Committee (GDC)

The Data domain board is set up for each domain defined in the organization, chaired by the DPO with participation from all relevant DPOs on a monthly basis. The key focus of the DDB is on data execution in the data domain, as defined in the data domain roadmap.

Example topics include translating the CDO roadmap to the data domain, and identifying escalation points and notifying the GDC.

The Group Data committee is chaired by the CDO, with mandatory participation of data domain owners. The key focus of the GDC is on data execution in all data domains as defined in CDO roadmap. Relevant example topics include resolving priority conflicts in the CDO roadmap, monitoring the extension and managing dependencies with executive board committees.

The actual implementation of the data domain board might vary between different organizations, for example, if the CDO is not a part of executive board. In this instance, the direct reporting line (e.g., CIO/CTO/CFO) would chair the Group Data Committee as an alternative to ensure alignment with other executive board committees. The frequency required for different committees is also depends on organizational data maturity and external requirements.



Data is a precious thing and will last longer than the systems themselves.

Tim Berners-Lee, inventor of the World Wide Web

# Section 3: Data is a vital asset for organizations, so changes to the data governance model require change management and stakeholder engagement

ata organizations are often viewed as ivory towers, but stakeholders should be actively involved from the beginning

Undertaking data transformation without input from business stakeholders significantly hinders the project's success. These stakeholders are crucial for aligning the transformation with organizational goals, ensuring the project reflects real business needs.

Early involvement of stakeholders in the design phase is essential for establishing a data governance framework that truly supports strategic objectives. For instance, a project initiated without consulting sales and customer service teams might overlook key customer insights. The result of this will be solutions that don't address actual customer challenges or market opportunities, undermining the transformation's value.

In the recent client cases we have supported, BCG established a process for working with stakeholders, which involves the following considerations:

- Streamline questions, feedback and input from the representatives of the entire organization: BCG facilitates a streamlined process to assess, categorize and translate the business requirements into design user stories. As a result, the organization is able to proactively incorporate context-specific requirements in governance design, and mitigate risks for operations for different country units and regulation requirements.
- Facilitate decision boards on multiple levels from Sounding Groups to Executive Committees: The design team leveraged Sounding Groups and Executive Boards for effective decision making. The Sounding Group is made up of key data professionals who can determine whether the target model would work for the organization, while the executive committee gathers input from the Sounding Group and design teams to finalize critical business decisions (e.g., Change management plan, business case investment, segregation of data domains and its scope).

• Organize show-and-tell sessions to selected domains: Except for the representatives and selected leadership, the final target design impacts the entire organization. Therefore, proactively scheduling a session for the organization when design reaches a steady and stable state would accelerate the process of change management for federated data governance design.

Given the size of the client, the engagement will require structural program management capabilities to steer, guide and govern the input and streamlining of the design deliverables. This ensures a proper foundation of stakeholder engagement.

#### Data transformation should embrace change management at its core, while identifying change champions from the start

Incorporating change management into data transformation is crucial for success, particularly when it comes to identifying and supporting change champions from the outset. Organizations frequently embark on transformation projects that fail to yield significant improvements, leading to employee fatigue and scepticism towards new initiatives. These transformation projects often challenge existing operational norms and threaten established value propositions, potentially triggering resistance from those accustomed to the status quo.

To navigate these challenges, it's essential to engage change champions within the organization—individuals who can bridge the gap between the transformation vision and the workforce. These champions advocate for the change, highlighting its benefits and addressing concerns, thereby playing a crucial role in fostering a culture that is open to federated data governance design.

Beyond appointing change champions, successful change management strategies should include comprehensive communication plans, tailored training programs, and active stakeholder engagement. For example, a company might use workshops and feedback sessions to directly address employee concerns, offering clear examples of how the transformation will streamline workflows and enhance job satisfaction. By taking a holistic approach to change management, organizations can effectively support their data transformation goals, ensuring alignment with broader strategic objectives and facilitating a smoother transition for all involved.

In conclusion, federated data governance has emerged as a critical path for organizations looking to mature their data management in a world where traditional models fall short. By adopting a federated approach, businesses are empowered to strike a delicate balance between the need for centralized oversight and the flexibility of decentralized agility. This approach not only aligns with strategic objectives and operational execution but also embraces cultural shifts and innovation in a regulatory landscape that is constantly evolving.

The journey to federated data governance is multifaceted, involving a strategic alignment with organizational goals, the building of a supportive and adaptable infrastructure, and a transformation of corporate culture to value data across all levels. With the right blend of strategic vision and practical execution, organizations can leverage data to its fullest potential — driving innovation, maintaining competitive edge, and ensuring compliance. The shift towards this model is not merely a trend but a reflection of the evolving dynamics of data ecosystems, necessitating a governance structure that is robust, flexible, and forward-thinking.

#### Operations in different countries with multiple entities brings additional layers of complexity

Navigating data governance in multinational organizations introduces distinct challenges, particularly when entities operate across diverse legal jurisdictions. In these example cases, each nation has its own set of data protection laws and regulatory frameworks. These differences can create operational hurdles, from aligning data storage practices to ensuring cross-border data flows comply with varying privacy regulations.

Real-life struggles include reconciling the EU's General Data Protection Regulation (GDPR) with local nuances, which may dictate unique data handling requirements. If not properly and proactively handled, legal constraints can be key blockers of design and implementation.

To mitigate these complexities, organizations must employ a governance model that's both globally consistent and locally adaptable. This involves developing clear policies that provide a unified governance approach while allowing for adjustments based on local legal demands. Essential design considerations should be focused on creating flexible policies that can swiftly adapt to changes in legal landscapes, establishing robust mechanisms for monitoring compliance, and determining the most effective structure for data governance. Central oversight must be balanced with local autonomy.

Addressing these challenges requires a proactive strategy, incorporating regular reviews of legal changes in each country, investing in training for local data handlers on international and local data protection standards, and employing technology solutions that can be customized to meet different regulatory requirements. By taking a strategic, informed approach to international data governance, organizations can reduce the risk of non-compliance, enhance data security, and ensure successful operation across borders.

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16 FEDERATED DATA GOVERNANCE MODEL

