Audit & Governance Committee

Date of Meeting: 30 July 2020

Report Title: Annual Information Governance Update 2019/20

Senior Officer: Gareth Pawlett – Chief Information Officer

1. Report Summary

1.1. This report provides an update on the Council's Information Assurance and Data Management (IADM) programme and outlines key aspects of the programme to assure the Committee that information is continued to be treated as a valued asset, with on-going measures to protect and manage it in line with compliance.

2. Recommendation/s

2.1. That the Committee note the progress made on the Information Assurance Programme during 2019/2020, and future vision to support on-going compliance.

3. Reasons for Recommendation

3.1. To provide the Audit and Governance Committee with an update on Information Assurance.

4. Other Options Considered

4.1. Not applicable.

5. Background

5.1. Information is a critical asset to many organisations, particularly so for local authorities where information is held in trust for its residents. Handling of Information and its assurance is essential to ensure that the organisation can meet its strategic objectives.

5.2. Information Assurance (IA) is a practice that addresses all risks to information and all manner of controls including technical, physical, procedural and personnel. IA is defined as the practice of managing information related risks.

5.3. The Council has an Information Assurance and Data Management (IADM) Programme in place to support centralised management of information, whether this be through technology, process or business change. Ultimately ensuring that the maturity and awareness of information being a strategic asset is increased across the organisation and underpinned by projects which support service delivery.

5.4. The Local Government Association information maturity assessment tool is a useful and realistic tool for self-assessing the maturity of the organisation across their peer group. Using this tool the Council has achieved a maturity rating of Intermediate.

There are five levels of maturity Nascent, Basic, Intermediate, Advanced and Expert and assessments are made over five disciplines:

- Data Governance
- Data Use
- Data Awareness and Culture
- Data Management
- Data Skills and Capability

The direction and delivery of IADM is focussing on these themes through several different channels with the aim that this will increase the organisations maturity levels.

The aim of programme is to increase the maturity and move the overall assessment to a level of Advanced. The programme has already made progress across all the disciplines through the work it has carried out and this has raised the Council to a higher level of maturity than a number of its peer groups.

Achieving greater maturity will ensure that the organisation is using information consistently, for the right purposes and to its full potential across service areas. This will increase confidence for officers and residents that information is used within controlled and managed frameworks and that the right vigour is applied to keep the standard of information as expected. It will also capitalise on the value of the organisations information assets as it will be in a state which will enhance and streamline service delivery.

Data Governance

5.5. The IADM programme is ensuring that appropriate governance, practices and processes are in place so that risks are managed and opportunities to share and use information are realised.

5.6. The programme has focussed on establishing core strategies and principles which have subsequently informed delivery over several months. A key part of the programme is the centralisation of information and a corporate, standard approach as to how that information is managed throughout its lifecycle, from creation to destruction.

5.7. IADM will continue to define and lead the requirements for information governance (see IADM Annual Update) across the organisation, and it is envisaged that this will ultimately form into an Enterprise Data Governance Board, which will be responsible for maintaining governance.

Data Use

5.8. A key deliverable of the programme is that all information entering the corporate estate will come through a managed route, this means the information will inherit the correct controls and measures once it enters the corporate environment.

5.9. The programme has successfully implemented a centralised Geographical Information System (GIS) which holds corporate geographic information which is consumed by line of business systems.

5.10. The programme will continue to align systems which aren't pointing to the corporate GIS including supporting the alignment of newly procured systems, this includes systems such used by the People Directorate which were previously using non-corporate mapping which didn't show county boundaries. This model enables the organisation to manage one set of GIS data, ensuring it is kept up to date, compliant and accurate.

5.11. IADM has taken the same approach with address data, bringing the corporate gazetteers up to Gold standard (as deemed by the national framework of GeoPlace) and pointing all systems, where possible, to the corporate gazetteer so we can be confident that systems are accessing accurate, good quality address data to support service delivery.

Data Awareness and Culture

5.12. The leadership and delivery of IADM will be a significant part of the success of compliant information management, however it will also largely be attributed to successful business change, adaptation in ways the organisation works and our behaviours.

5.13. IADM will continue to manage a business change plan with communications into leaders of the organisations, underpinned by working and steering groups which will own parts of the delivery. This will ensure IADM delivery is aligned to the real-world issues and solutions, it will also continue to raise the maturity through expert knowledge outside of the core programme and

Information Governance (IG) teams, and foster ownership of IG and information within business teams.

Data Management

5.14. The programme has and will continue to achieve this through a combination of information management disciplines such as Enterprise Content Management (ECM), Document and Records Management (DRM), Master Data Management (MDM) and Data Quality Management (DQ).

5.15. These disciplines will give the organisation a set of defined processes and tools to allow the business to effectively organise and store information, and so will support the vision of managed information throughout its lifecycle. This will include managing the entry of information into systems so content is controlled from the point of creation to deletion.

5.16. MDM will bring real benefit to the organisation, by matching data across several systems to create a common understanding of our residents and employees. This will support consistency and accuracy of data.

5.17. By leveraging core information management disciplines, the organisation will have the confidence that irrespective of where in the environment the information sits, it will have a standard set of controls around it, which meet compliance requirements. These may include retention dates, metadata embedded within the information which supports or limits sharing. It will also support the assignment of protective marking to limit or support practices and behaviours.

Data Skills and Capability

5.18. The programme also continues to work within the organisation to raise the understanding of information types, irrespective of format or physicality, and where these information types should be held and why. For example, the need to understand that emails holding case or business-related content should not be stored within the email system because they originate from that location or system, but that the information should be understood as a corporate record and held with the right case record or content system.

5.19. A number of mandatory e-learning modules have been produced under the umbrella of Protecting and Managing Information for all staff to complete. In addition, "One Minute Guides" for Adults, Children's and Places Bronze Cells has been produced on Information Management. These have provided clear guidance on how to continue to handle, store, share and protect information responsibly despite the challenges presented by Covid-19.

6. **Implications of the Recommendations**

6.1. **Legal Implications**

6.1.1. The Council must comply with the General Data Protection Regulations (GDPR), the Data Protection Act 2018, the Computer Misuse Act 1990, the Freedom of Information Act 2000 and other relevant legislation in particular that relating to retention of information.

6.1.2. At the heart of GDPR are the data protection principles, the IADM programme in particular addresses the following principles:

6.1.2.1.1. Data minimisation – organisations must ensure that personal data they process is adequate, relevant and limited to what is necessary;

6.1.2.1.2. Accurate – where necessary ensure that personal data is accurate and up to date; and

6.1.2.1.3. Storage limitation – personal data must not be kept for longer than required by an organisation, a policy setting standard retention periods is required and applied.

6.1.3. GDPR has brought in substantially higher levels of penalties for data controllers than the previous legislation, up to €1 million in respect of public authorities and public bodies and upto €20 million or 4% of annual worldwide turnover for other organisations. GDPR has also introduced fines for data processors. The Council needs to understand what data they control and what is procesed on their behalf and build data protection into it's day to day processes to ensure that it and organisations processing data on its behalf are compliant.

6.2. **Finance Implications**

6.2.1. There are no financial implications but as the report highlights, failure to appropriately manage data and information could leave the council open to financial penalties.

6.3. **Policy Implications**

6.3.1. The Council's internal policies on Data Protection, ICT Security and Information Assurance will reflect any changes identified as part of the GDPR, the Data Protection Bill and the Data Protection Act 2018.

6.4. **Equality Implications**

6.4.1. Equality impact assessments will be undertaken when required.

6.5. Human Resources Implications

6.5.1. Under the new GDPR data subjects can obtain from the data controller confirmation as to whether or not personal data concerning them is being processed, where and for what purpose. This requirement cannot be met if information is not managed in a compliant manner or used as a storage mechanism for information.

6.6. Risk Management Implications

6.6.1. Any changes to the risk profile of information and the Council will be detailed within the corporate risk register.

6.7. Rural Communities Implications

6.7.1. There are no direct implications for rural communities.

6.8. Implications for Children & Young People/Cared for Children

6.8.1. There are no direct implications for children and young people.

6.9. Public Health Implications

6.9.1. There are no direct implications for public health.

6.10. Climate Change Implications

6.10.1. There are no direct implications for climate change.

7. Ward Members Affected

7.1. Implications are borough wide

8. Consultation & Engagement

8.1. The Information Governance Update has been considered by the Audit and Governance Committee in July 2019.

9. Access to Information

9.1. There is no additional information.

10. Contact Information

10.1. Any questions relating to this report should be directed to the following officer:

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Information Assurance and Data Management
## 2019/20 Annual Update

As an organisation, we are processing higher volumes of information than ever before, this is due to there being so many channels to now create information and the push towards Digital working, which enables faster, more efficient working.

Throughout 19/20, IADM has focussed on investigating and understanding the masses of unmanaged information the organisation holds. The programme is developing a robust governance framework to manage legacy content issues, and ensure these issues are not replicated again in the future as we continue to generate content.

Behaviours are a key part of maintaining compliant Information Management. Remember;

1. Always keep information in line with retention schedules
2. Corporate information must always be kept in the correct location, whether this be a case management system, SharePoint site or a line of business system
3. Ensure only one copy of a document is held – do not keep duplicate or local copies of corporate information
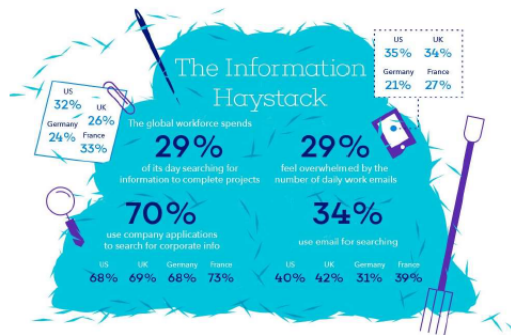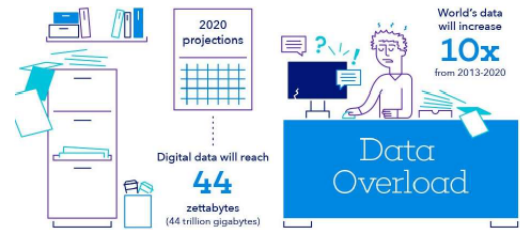

IADM introduced the **mailbox retention policy** which has and will continue to challenge the way colleagues process information. The policy pushed a real change in behaviours by educating users on types of information and where these should be rightly saved and why.

- **Business** emails; official records which include information created, received, and maintained as evidence of a process, case and / or procedure > this content should be moved to the right system or case file
- **Transitory** emails: only required in order to complete a routine action or to prepare a subsequent record > these emails should be routinely deleted

There is a Solution
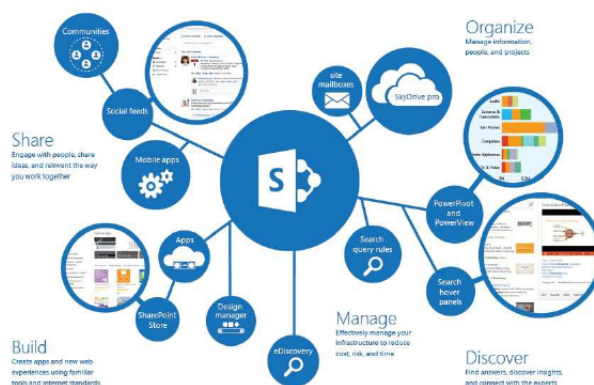
IADM is designing an Enterprise Content Management (ECM) solution with governance to outline a consistent way of managing information throughout its lifecycle.

ECM will;

1. Enforce ways of working in line with policy and **compliant** practice
2. **Classify** all content which enters the ECM environment, which will ultimately drive **retention** and other compliance controls
3. **Organise** unstructured content
4. Provide **consistent** tools, processes and policies for content across the organisation