

Audit & Governance Committee

Date of Meeting: 30 September 2021

Report Title: Annual Information Governance Update 2020/21

Report of: Jane Burns - Executive Director Corporate Services

Ward(s) Affected: Implications are borough wide

1. Executive 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 continues to be treated and managed as a valued asset, with on-going measures to protect it in line with compliance.
- 1.2. This report provides the Audit and Governance Committee with an update on Information Assurance and to advise on progress made with the Information Assurance Programme during 2020/2021.
- 1.3. This report outlines the future vision to support on-going compliance in addition to key initiatives underway which will leverage information to streamline, enhance and unify business processes and delivery.

2. Recommendation/s

- 2.1. That the Committee note the progress made on the Information Assurance Programme during 2020/2021, 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 IADM programme is also leading key projects which will not only underpin the safeguarding of information but will also enhance the use of information which will ultimately enable the organisation to use information to its full potential where it is appropriate to do so.

6. Briefing Information

- 6.1. Gartner's Enterprise Information Management (EIM) Maturity assessment tool is a useful and realistic method for self-assessing the organisations position, progress, areas of focus and overall levels of maturity.
- 6.2. The tools assesses using four levels of maturity; *Highly Unbalanced*, *Somewhat Unbalanced*, *Somewhat Balanced* and *Highly Balanced* and assessments are made over seven themes:
 - **Vision** – clear definition of business goals with the vision and initiatives in place to deliver against them it
 - **Strategy** - the level of clarity, outline and communication pertaining to the organisations attitude and approach to information and how this generates benefit
 - **Metrics** - demonstration of value beyond ICT teams, level of EIM alignment and support of enterprise performance improvements
 - **Governance** - frameworks and accountability for the processing of information
 - **Organisation and Roles** - an established organisation and structure which is accountable for EIM, a cross section of expertise focused on attaining enterprise goals

- **Lifecycle** - the proper flow and management of information from creation to deletion
- **Infrastructure** - components, information architecture and application needs

6.3. Over the last four years, IADM has self-assessed with the following outcomes, all scores are out of 5, and the assessment is made by aligning back to delivery and commissioning.

	17/18	18/19	19/20	20/21
Vision	3.03	3.29	3.25	3.26
Strategy	3.64	3.61	3.65	3.81
Metrics	2.13	2.82	3.26	3.38
Governance	2.43	2.95	2.96	3.02
Org/Roles	1.90	2.97	3.06	3.11
Lifecycle	2.34	2.74	3.05	3.28
Infrastructure	2.20	2.67	3.05	3.24
Overall	2.52	3.01	3.18	3.30

At the end of the financial year 20/21, using this tool the Council has achieved a maturity rating of “Somewhat Balanced”. The description for “Somewhat Balanced” is:

“These organizations typically have become more proactive in addressing certain areas of information management and have started to put the “enterprise” in enterprise information management”.

- 6.4. All of the seven themes have progressively improved over the four years, although there has been a slight regression in the Vision score which is attributed to changes in legislation (GDPR) and working practices (COVID pandemic) which have rightly altered and refocussed the strategic direction.
- 6.5. The direction and delivery of IADM is focussing on these themes through several different channels with the aim to increase the organisations maturity levels.
- 6.6. The aim of programme is to increase the maturity and move the overall assessment to a level of Highly Balanced. The programme has already made progress across all the themes 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.

6.7. 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 rigour 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.

6.8. **Vision**

6.8.1. The commissioning of a multi-year capital programme which is focussed on the development and transition of information focussed deliveries is and continues to be a fundamental part of the organisations vision.

6.8.2. IADM continues to champion, lead and deliver against six key principles which align to the organisation's vision for Information Management and Governance:

- To provide clear leadership and guidance on how the organisation should manage, control and retain information
- Create, grow and foster a culture that values information
- Enable and assure compliance
- Create and embed corporate information standards and frameworks
- Champion the accuracy, availability and integrity of information
- Use information to create intelligence

6.8.3. All projects and activities under the programme align to these principles and so by delivering against these the organisations maturity in these areas will continue to grow.

6.8.4. 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.

6.9. **Strategy**

6.9.1. The Programme continues to deliver fundamental strategies, processes and technologies to enable business areas to handle information compliantly and within the correct controls of information governance.

6.9.2. The Information Strategy is under development and has been peer reviewed by the officer Information Governance Group prior to agreement and publication. The strategy commits to growing an environment to:

- Work flexibly, where and when it best suits the workforce, their customers and service users
- Ensure reliable, timely and accessible information that drives informed decision making, service commissioning and business transformation
- Enable a flexible, scalable and secure logical information platform that enables the correct levels of assurance and governance whilst enabling the task force
- Centralise information that is consistent, accurate, usable and accessible across all services
- Standardise information across the organisation without obstructive silos pertaining to data, process, technology.

6.9.3. It is the objective of the programme to enable the organisation to achieve and operate against a data management strategy in a mature and compliant way which will attain tangible benefits as well as meeting the organisations duty of care to residents and service users.

6.9.4. Each phase of the programme has and will grow the organisation's compliance and maturity in the way personal, sensitive information is handled. Initial work has focussed on essential projects, compliance, training, change projects and definition of complex areas such as Master Data Management (MDM), Enterprise Content Management (ECM) / services and information governance which still require important development.

6.10. **Metrics**

6.10.1. In order to truly deliver valued use of information, it will be fundamental that value is demonstrated beyond ICT teams and applications. IADM has focussed on enhancing business knowledge and ownership of information and this continues to mature practices in the business areas and operationally.

6.10.2. Key projects under the programme will enhance information management and processing of information for the services. MDM will harmonise and synchronise data across several systems to create a common understanding of our residents and employees.

- 6.10.3. With the implementation of significant projects such as ECM and other 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.
- 6.10.4. 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 various parts of 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 teams, and foster ownership of IG and information within business teams.

6.11. Governance

- 6.11.1. 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. IADM also works closely to and dovetails with the Information Governance Group (IGG), supporting with business change projects where IGG note a corporate requirement.
- 6.11.2. The programme has and will continue to achieve appropriate levels of governance through a combination of information management disciplines such as Enterprise Content Management , Document and Records Management, Master Data Managementand Data Quality Management .
- 6.11.3. IADM will continue to define and lead the requirements for information governance across the organisation. It utilises existing governance arrangements such as the Information Governance Group which supports the Senior Information Risk Owner (SIRO) who takes overall ownership of the organisation's information risk management policy, and the Data Protection Officer who is responsible for ensuring the organisation's data protection compliance.

6.12. Organisation and Roles

- 6.12.1. The programme is working 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.
- 6.12.2. IADM has been and will continue to place focus and importance on the “Data Steward” role which operationally works with and processes information within the business. The organisation has a well-rounded group of subject matter experts to support IM, but it will also be the Data Steward roles at the business level which will enhance organisational maturity and behaviours.
- 6.12.3. As part of a comprehensive multiyear training approach, 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.

6.13. Lifecycle

- 6.13.1. Information Management 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.
- 6.13.2. Content Management is a central part of realising a standardised, simplified, and rationalised way in which content is held, used, stored and destroyed across the organisation thereby ensuring its compliance across its lifecycle.
- 6.13.3. In this way the organisation will understand the information it has, where it is held and be assured that it’s being held for the correct period of time. Standardising the classification and retention of content

is central to this compliance and will cover both legacy content and content management for the future.

6.14. Infrastructure

- 6.14.1. Over the last year, the programme has ensured the core components which are needed to enhance maturity and deliver value against areas of IM have been procured and implemented.
- 6.14.2. This now means that the programme has the tools, applications and infrastructure in place to implement core projects such as MDM and ECM. It will be leveraging of technologies such as SharePoint online which allow the organisation to mature practices pertaining to search, storing, automate and lifecycle management.
- 6.14.3. The programme has successfully implemented a centralised Geographical Information System (GIS) which holds corporate geographic information which is consumed by line of business systems and will continue to align systems to the corporate information platforms where this is not the case.

7. Implications of the Recommendations

7.1. Legal

- 7.1.1. 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.
- 7.1.2. At the heart of GDPR are the data protection principles, the IADM programme in particular addresses the following principles:
 - 7.1.2.1. Data minimisation – organisations must ensure that personal data they process is adequate, relevant and limited to what is necessary;
 - 7.1.2.2. Accurate – where necessary ensure that personal data is accurate and up to date; and
 - 7.1.2.3. 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.
- 7.1.3. GDPR has brought in substantially higher levels of penalties for data controllers than the previous legislation, up to € 20 million (£17m) or 4% of annual worldwide turnover although it is capped at €20 million for public authorities. GDPR has also introduced fines for data

processors. The Council needs to understand what data they control and what is processed on their behalf and build data protection into its day to day processes to ensure that it and organisations processing data on its behalf are compliant.

7.2. Finance

7.2.1. 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.

7.3. Policy

7.3.1. 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.

7.4. Equality

7.4.1. Equality impact assessments will be considered when required.

7.5. Human Resources

7.5.1. Under the new GDPR data subjects have a number of rights in relation to their personal data, including 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.

7.6. Risk Management

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

7.7. Rural Communities

7.7.1. There are no direct implications for rural communities.

7.8. Children & Young People/Cared for Children

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

7.9. Public Health

7.9.1. There are no direct implications for public health.

7.10. Climate Change

7.10.1. There are no direct implications for climate change.

Access to Information	
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Appendices:	N/A
Background Papers:	N/A