Audit and Governance Committee

Date of Meeting:	28th July 2022
Report Title:	Audit and Governance Committee – Annual Information Governance Update 2021/22
Report of:	Jane Burns, Executive Director Corporate Services
Report Reference No:	AG/42/21-22
Ward(s) Affected:	Implications are borough wide

1. Purpose of Report

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 and leverage it where possible to support enhanced service delivery and optimise business benefit.

1.2. The protection and management of information directly supports the corporate plan by means of enabling the organisation to be transparent, promoting and enabling services, underpinning the digital emergence of technologies and overall supporting the organisations vision to support compliance and security of information whilst delivering innovative services for Residents.

2. Executive Summary

2.1 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 2021/2022.

2.2. The Council relies on accurate and timely information and data for service areas to make informed decisions and fulfil the aims of the organisation and needs of its residents in a cost-efficient and effective way.

2.3. This report outlines the progress made ensuring the Council matures its use of information and data through on-going compliance through key projects and initiatives which are underway to enable services to streamline information, enhance and unify business processes and delivery.

3. Recommendations

3.1. That the Committee note the progress made on the Information Assurance Programme during 2021/2022, and the future vision to support ongoing compliance.

4. Reasons for Recommendations

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

5. Other Options Considered

5.1. Not applicable.

6. Background

6.1. Information is a critical asset to many organisations, particularly so for local authorities where information is held in trust for its residents and the types of information processed are so diverse, varying in levels of sensitivity and risk. Handling of information and its assurance is essential to ensure that the organisation can meet its strategic objectives and ethical responsibilities.

6.2. 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.

6.3. The Council has an Information Assurance and Data Management (IADM) Programme in place to support the adoption, improvement, and alignment of IA, including the 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 and how it should be processed, is increased across the organisation and underpinned by projects which support service delivery.

6.4. The IADM programme is leading key projects which not only underpin the safeguarding of information but will also enhance the use of information which will enable the organisation to use information to its full potential where it is appropriate to do so.

6.5. The Programme has used the Gartner's Enterprise Information Management (EIM) Maturity assessment tool to monitor progress and to provide an assessment for future workloads to increase the organisations maturity. The programme uses this assessment tool at the end of every delivery year, so comparisons can be made, reprioritisation and focus can

take place where appropriate and the programme business case can be aligned accordingly.

The tool assesses maturity by using four categories; *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

	Balance	Level	Overall Score	Vision	Strategy	Metrics	Governance	Org/Roles	Lifecycle	Infrastructure
2016/17 EOY	Somewhat Unbalanced	Proactive	2.72	3.07	3.63	3.25	2.69	1.90	2.33	2.20
2017/18 EOY	Somewhat Unbalanced	Proactive	2.52	3.03	3.64	2.13	2.43	1.90	2.34	2.20
2018/19 EOY	Somewhat Balanced	Proactive	3.01	3.29	3.61	2.82	2.95	2.97	2.74	2.67
2019/20 EOY	Somewhat Balanced	Proactive	3.18	3.25	3.65	3.26	2.96	3.06	3.05	3.05
2020/21 EOY	Somewhat Balanced	Proactive	3.30	3.26	3.81	3.38	3.02	3.11	3.28	3.24
2021/22 EOY	Somewhat Balanced	Proactive	3.35	3.37	3.71	3.59	2.97	3.20	3.35	3.26

6.6. Over the last five 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, business engagement and commissioning.

6.7. At the end of the financial year 21/22, 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".

6.8. Overall, the maturity has improved over delivery periods, however the table does highlight scores where maturity has regressed. This is to be expected when significant deliveries are underway which challenge the organisations behaviours, ways of working and importantly, in IADMs case, the ownership of information and associated activities.

6.9. A number of key regulatory and internal changes have impacted on the scores and at times resulted in regression of the scores, i.e., a notable regression can be seen at the end of 17/18 due to the impending changes from the GDPR / Data Protection Act 2018. During the later years of regression, IADM has been tackling investigations into large areas of data with unknown content types and associated retention periods amongst other projects and so it is to be expected, as IM issues are understood that the scores will regress, but also as deliveries such as ECM and MDM are implemented the scores will increase and stabilise.

6.10. The end of year assessment for 21/22 shows a reduced score in the Strategy and Governance scores. The Strategy score has reduced as a consequence of the initial findings with Enterprise Content Management (ECM), this workstream is tasked with harmonising the way content is processed across several content management platforms, in doing this IADM has discovered several disparate ways in which content is being processed and managed. This was to be expected and ECM will embed consistent ways to manage information with consistent taxonomies across service areas, thereby ensuring reliable management of information in line with the Strategy and adoption of technology, business process and changes in behaviour. IADM has published a strategic view of how information must be managed consistently, and now the programme will focus on implementing this operationally.

6.11. The Governance has a reduced score due to increased activity and scope of Master Data Management (MDM), this workstream is tasked with harmonising key data fields which are used across the authority within several teams for varying reasons, often these fields are out of step and are

managed in different ways. MDM, as it is deployed and adopted, will enable more automation of Data Quality and formalised ownership of data where it is required. Adoption of MDM will lead the standardisation and harmonisation of the core data fields, resulting in a master record of fields which will be consistent across the authority irrespective of the business area or system. These standard data fields across multiple systems and service areas will ensure that management and governance across the organisation will improve data quality in a consistent manner.

6.12. The direction and delivery of IADM is focussing on these themes through several different channels with the aim to increase the organisations maturity levels, by doing this, the authority can be assured that information is being protected and utilised in ways which benefit both service delivery and compliance.

6.13. The aim of programme is to increase the maturity and move the overall assessment to a level of Highly Balanced which will ensure that information is used efficiently and consistently across the organisation. IADM is not striving for best practice for best practice's sake, the programme is focussing on pain points so improvements in maturity don't only lend themselves to strategic success but improve and optimise delivery.

6.14. Vision

6.14.1. The IADM Programme has published an Information Management Strategy (Appendix 1) which outlines this vision:

- We will be an information centric organisation
- Information will be at the heart of all we do and is recognised to be central to service delivery
- Information management is embedded and owned within services areas, it is seen to be a part of all roles and not just a centralised function
- Information is safe, secure, of good quality and accessible to users so they can deliver services efficiently and accurately

6.14.2. With the strategy in place, the programme is now working to provide a corporate information management framework underpinned by the required technology platforms to centralise information. This will comprise of several disciplines, from knowledge management, to master data management, to information governance. The programme will continue to be clear on the vision, but also will work with services and technology to implement this vision. The programme will ensure that business engagement is central to adoption, and will provide clear strategy, best

practice guidelines and core processes on how information should be used, processed and managed throughout its lifecycle.

6.15.   Strategy

6.15.1.   The Programme is delivering several workstreams which will impact the fundamental workings of the organisation when it comes to content, and so the programme has already published several strategies to support this including Master Data Management, Business Intelligence, and Information Management. The programme will also deliver strategies related to Enterprise Content Management and Location Management, all will support the Information Management strategy, adopting the core principles and themes.

6.15.2.   All IADM published strategies will commit to growing an environment which enables the organisation 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 workforce
- 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.

6.16.   Metrics

6.16.1.   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.

6.16.2.   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.

6.16.3.   IADM is also ambitious to enhance areas such as knowledge management and profiling to support enhanced use of information and technology. The

programme has recently published a one-page infographic outlining these ambitions for the future (Appendix 2).

6.16.4. With the implementation of significant projects such as ECM and other 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, which meet compliance requirements. These may include retention dates and metadata (such as content type or protective marking) 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.

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

6.17. Governance

6.17.1. 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 works in harmony with the Information Governance Group (IGG), supporting with business change projects where IGG note a corporate requirement.

6.17.2. 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 Management and Data Quality Management.

6.17.3. IADM continues to define and lead the requirements for information governance across the organisation. It utilises existing governance arrangements such as IGG 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.

6.18. Organisation and Roles

6.18.1. 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 the information should be understood as a corporate record and held with the right case record or content system. IADM has now been able to email retention policies to automate this practice, having given a long period of time for users to adopt this changed behaviour. IADM has and will continue to work with colleagues and services whilst also leveraging technology to automate and streamline IM where possible.

6.18.2. 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 to adopt correct processes and behaviours, which will enhance organisational maturity.

6.18.3. 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 (PAMI) for all staff to complete. In addition, several guides have been produced to provide clear guidance on how to continue to handle, store, share and protect information responsibly in the changing environment that we continue to work in.

6.18.4. Organisational training is essential to successful adoption of compliant behaviours and enhanced maturity for operational information management. IADM will continue to deliver annual mandatory training to support on-going knowledge building and compliance.

6.19. Lifecycle

6.19.1. 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.

6.19.2. Content Management and Records Management are 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.

6.19.3. In this way the organisation will understand the information it has, where it is held through the Information Asset Register (IAR) and be assured that it's being held for the correct period. Standardising the classification and retention of content through the ECM projects is central to this adherence to compliance.

6.20. Infrastructure

6.20.1. Therefore, throughout 20/21, the programme has been testing, configuring and implementing various tools, applications, and infrastructure to support key areas of the programme such as MDM, ECM, Digitisation and Information Assurance. The programme will leverage technologies such as SharePoint Online which allow the organisation to mature practices such as search, storing, automate and lifecycle management.

6.20.2. The programme has successfully implemented a centralised Geographical Information System (GIS) which holds corporate special data which is consumed by line of business systems and will continue to align systems to the corporate information platforms. The similar approach has been achieved with location data, with centralised gazetteers and utilisation of the Unique Property Reference Number (UPRN) and Unique Street Reference Number (USRN).

7. Consultation and Engagement

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.

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 and 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:	Appendix 1 Information Management Strategy
	Appendix 2 Information Management Infographic
Background Papers:	N/A