

Information Governance Support

Nottinghamshire County Council

in partnership with

Essex County Council



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INFORMATION GOVERNANCE STRATEGY

A strategy document providing a methodology for implementing solutions to improve and maintain Information Law compliance

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1. Executive Summary

1.1. This strategy sets out a framework which provides a comprehensive and corporate approach to all aspects of Information Governance. In doing so, it reflects the wider legal framework that is now imposed on public sector information through legislation such as the:

- Freedom of Information Act (2000) (FOI)
- Environmental Information Regulations (2004) (EIR)
- Data Protection Act (1998) (DPA) > General Data Protection Regulations (2016) (GDPR)
- Investigatory Powers Act (2016)
- Requirements for respect for private life and freedom of expression under the Human Rights Act (1998) (HRA).

1.2. There are also practical, business reasons for an Information Governance Strategy. Effective Information Governance will create efficiencies in accommodation, IT and better use of human resources by providing ready access to relevant information and the storage or destruction of irrelevant information. This will in turn lead to a better service provided to service users.

1.3. There is a need for an overarching approach to Policy development. Some policies are in place and, although there are some areas of good practice, a consistent means of creating, reviewing and maintaining policy is required.

1.4. This Strategy applies to all recorded information irrespective of content, format or source. The Strategy defines Information Governance as the means by which we processes information from its inception to its disposal and, secondly, the means by which it identifies the value of the information and maximises its exploitation.

1.5. The IG Strategy is driven by 4 principles:

- Compliance
- Consistency
- Supporting our priorities
- Value for money

1.6. The IG Strategy identifies a number of key work streams required to implement these principles:

- **A corporate Information Governance structure:** Defining Information Governance roles at all levels. This may be new and separate from the existing management structure or added to the responsibilities of existing structures.

- **A co-ordinated information policy framework:** Policies covering all necessary aspects of compliance as part of a framework and all consistent with the principles set out above.
- **A corporate records management framework:** Including corporate file classification, an information audit and the creation of Information Asset and Data Lifecycle Mapping registers.
- **A communications and training plan:** To instil the new Information Governance culture and processes supporting adoption of new ways of working
- **An assessment of resources/ finances:** Available for Information Governance implementation.
- **Integration with existing policies and procedures:** Ensuring consistent corporate messages to and expectations of employees.
- **Monitoring and performance management arrangements:** Governed by the corporate Information Governance structure

- 1.7. The IG Strategy recognises that it is impractical to expect to find a single solution for Information Governance. The diversity of the information held does not lend itself to a single solution. Instead, the Strategy's intention is to provide a consistent standard to be achieved, although the means by which it is achieved may vary.
- 1.8. Finally, the strategy sets out the work plan required to bring it to life and address the issues around roles and responsibilities and accountability that need to be resolved to ensure information is accessible, available to those that need it and managed in line with our legal obligations.

2. Introduction

- 2.1. Information is a valuable asset that requires effective management. This strategy (the IG Strategy) establishes the framework for the delivery of an Information Governance structure to introduce the required controls to maximise value from the asset.
- 2.2. A number of areas operate effective Information Governance or aspects of Information Governance. However, there is no clear and coordinated framework, therefore an Information Governance framework must be established that will apply to all information; electronic and physical. Other drivers are the need to ensure robust compliance with the increasing legal framework on public sector Information Governance, the need to be more efficient in the use of our information assets and the wider public sector Transparency Agenda which requires a very different approach to how we share information.
- 2.3. The benefits of the strategy will be:

- Efficiency through the more effective use of physical, electronic and human resources
 - Better service delivery through improved access to relevant information making requests easier to handle in a shorter time.
 - Environmental benefits by reducing reliance on paper files and physical storage.
 - A better working environment through the removal of irrelevant information and documentation from the office environment allowing staff easier access to the information required to perform their work.
 - Improved compliance with legal requirements boosting reputation.
- 2.4. Finally, the strategy does not seek to re-invent the wheel. It aims to bring together and learn from best practice, and build a corporate framework for information management.

3. Principles

- 3.1. Policy sets out the key principles of Information Governance (IG):
- **Compliance** – with legal requirements, IG standards and relevant policies.
 - **Consistency & Simplicity** – Any systems and procedures adopted must be simple to use, understand and implement.
 - **Supporting Priorities** – information is managed and used in a way that supports current priorities.
 - **Value for Money** – adopted systems and processes are economic, efficient and effective and seek to find ways to maximise income from information.
- 3.2. The IG Strategy must balance these principles and, in different situations, different priorities will require different emphasis. To implement these principles the IG Strategy will aim to:
- Standardise the processing of information throughout its lifecycle.
 - Minimise the number of locations and formats in which information is created and retained.
 - Introduce a simple, corporate file classification system.
 - Ensure that staff, members, partners and the public have easy access to information in accordance with their rights of access.
 - Ensure that information is retained only if it serves a purpose; i.e. compliance with legal requirements or support of priorities.

4. Scope

- 4.1. The IG Strategy provides a corporate framework for implementing IG Policy. The implementation and delivery of the IG Strategy, however, is the responsibility of all managers and employees. IG cannot be viewed as a purely IT or legal compliance issue. Aspects of implementation may be picked up by other projects, including information security and any planned major system changes.

5. Roles & Responsibilities

- 5.1. Every employee creates recorded information and so all are responsible for its effective management. Without the engagement and involvement of employees at all levels, this strategy will fail. This can be achieved through establishing clear responsibilities for information management, effective communications and performance management. The latter two processes are dealt with later in this Strategy
- 5.2. Responsibilities for Information Governance will fit within the existing the responsibilities of all managers but IG also requires a clear corporate management hierarchy to ensure that implementation of the strategy is given strategic direction, policies can receive corporate approval and performance is monitored. This hierarchy may be incorporated into existing management structures or be separately constituted. The responsibilities are essential to successful delivery:
- Senior Information Risk Owner (SIRO)
 - Information Governance Board (IGB)
 - Employees with specific information management responsibilities and accountabilities.
 - A specialist Information Governance function to maintain policies, monitor performance and ensure compliance (where resource allows – otherwise this responsibility is allocated to the other roles above)
- 5.3. The responsibilities for Information Governance will be:

Group/Person	Responsibilities
Information Governance Board	• Corporate responsibility and oversight
Department	• Responsibility for implementation in department of corporate IG policies • Responsibility for meeting performance indicators. • Representation on Information Management Board.

SIRO	• Lead for IG issues and communications. • Chair of Information Management Board • IG Policy lead
Information Governance Board	Forum for: • The oversight and approval of implementation of the IG Strategy by Directorates and corporately • The monitoring of IM performance and development of standards • Determines our response to legislative and other developments. • Includes SIRO. • Reporting to other stakeholder groups. • Review and approve IG policies • Co-ordination with related Projects/initiatives
Departmental IG employee roles	• Responsible for operational IG issues and first instance guidance on corporate policies. • Identifying and reporting IG issues/concerns. • Report to Information Management Board when required
Specialist Support staff	• <i>IT</i> for Technical solutions and storage of electronic documents and records • <i>Information Governance Lead/team</i> for policy development, records management, monitoring of performance and compliance validation • <i>Legal Resource</i> for legal support • <i>Internal/ External Audit</i> for validation of governance and compliance with legal and performance standards

5.4. Flexibility must be retained in the governance structure to allow departments to meet their responsibilities in ways that best fit their existing organisation and the types of information held. However, the Information Governance Board will monitor implementation.

Action Required

- Agreement of IG structure.
- Establishment of Information Management Board, or include responsibilities within an existing or redefined Board.
- Identification of Departmental level expertise and review of resources available to them to ensure compliance and effective performance.
- Establishment of the IG role/ function to fulfil the corporate responsibilities

- Establishment of an independent audit plan to validate compliance

6. Implementation

6.1. Implementation of the IG Strategy will require time and resources. For this reason, it is divided into a number of different work streams, which may constitute separate projects or be integrated into existing projects. The work streams are:

- A co-ordinated information policy framework.
- Corporate records management framework including:
 - corporate file classification,
 - an information audit and
 - the creation of a corporate Information Asset and Data Lifecycle Mapping register.
- A communications and training plan for IG
- An assessment of resources available for IG implementation.
- Integration with existing policies and procedures.
- Monitoring and performance management arrangements.

6.2. Full implementation of the IG strategy will take time and transitional arrangements will need to be agreed for some areas, particularly for records management. Full implementation of records management is not required for all information held. For example, closed files awaiting disposal can be assessed as not requiring full records management compliance, as this would not provide value for money or create a significant compliance risk, so long as they are stored securely, are readily accessible and a compliant disposal plan is put in place.

7. Policy Framework

7.1. A comprehensive, co-ordinated information policy framework is required. Each policy may need its own implementation plan. The IG Policy Framework will include the following policies:

Statutory Requests for Information	• Providing for public requests for access to information held under FOIA, DPA/GDPR and EIR. • It will also address the Transparency agenda
Data Protection	• Regulating and monitoring the processing of personal data
Financial Information Governance	• Primarily relating to PCI-DSS compliance for the handling of electronic payments, but must also cover CHIP and PIN and corporate systems.

Information Security Measures, Incident Management & Data Handling	• Security Incident management process • How data should be handled to best ensure its security • Providing corporate standards for the security of information held and meeting relevant standards such as: ○ Cyber Essentials or ○ ISO 27001
Records Management	• Regulation of the maintenance of all records throughout their lifecycle and meeting government standards and the Code of Practice under section 46, FOIA.
Surveillance	• Procedures for surveillance including the use of CCTV, drones and body-worn cameras and any proposed use of covert surveillance under the Investigatory Powers Act (2016).

7.2. A review of policy should also consider the quality of public access to these policies.

Action Required

- Review and amendment of current policy set.
- Creation of new policies as required

8. Records Management Framework

8.1. Introduction

8.1.1 The cornerstone of good IG is effective records management. Records management means the systems adopted to control and manage the creation, use, retention and disposal of information in a way that is administratively and legally compliant but also serves operational needs. Effective records management will ensure that information is available when and where it is needed, in an organised and efficient form and that unneeded information is filed, archived or disposed of as is appropriate. Conversely, poor records management results in the superfluous retention of redundant electronic and paper information, the loss of information and poor access to relevant information. Consequently, effective records management will deliver the IM Policy principles of:

Compliance	• FOI, EIR and DPA/GDPR responses will be more efficient and accurate, reducing complaints. • Duplicates and drafts can be destroyed safely • Information security will become simpler and more secure. • Risks of enforcement action reduced
Consistency and Simplicity	• A single corporate standard for the classification and storage of information will improve the retrieval, disposal and the re-use of information
Support Priorities	• Providing clear, accurate information and records for the determination of policies and strategies. • Greater transparency and accountability raising credibility. • Improving work environment for employees
Value for Money	Delivering efficiencies from: • reduced need for electronic and physical storage • More effective information retrieval allowing customer queries to be handled quickly and more satisfactorily. • Reduced time and costs on FOI/DPA requests

8.1.2. Implementation of a records management framework can be divided into distinct but interrelated parts.

8.2. Corporate Records Management Policy

8.2.1. An updated records management policy providing strategic guidance to all Departments. Records management will be based on the widely accepted **HORUS** principles which requires records to be:

Held securely and confidentially

Obtained fairly and efficiently

Recorded accurately and reliably

Used effectively and ethically

Shared appropriately and lawfully.

8.2.2. To meet these aims, we will adopt a system where there is a single, **corporate record** of recorded information. A corporate record is the primary and preferably sole record of each piece of information. The aim will be to move towards having one version of

information, in one formation and one location. Records management will reflect that aim.

8.2.3. A single, corporate record will reduce the amount of information held, make relevant information easier to locate and access and reduce risks from inaccurate information being held or unauthorised access being gained to information. It is recognised, however, that for practical, technical and legal reasons, this may not be possible for all records but it should be the standard aimed for by, for example, reducing the number of versions, copies and formats of information held.

Action Required

- Review existing guidance
- Update in accordance with IG Policy.
- Approval from IMB as required.
- Develop and deliver communications plan.

8.3. “Single Issue” Policies

8.3.1. Specific policies or guidance on practical, day-to-day IG issues are also needed to provide operational guidance to staff and managers based on HORUS principles. Such policies will address day-to-day records management issues including:

- Email use and deletion.
- The naming, retention and deletion of draft documents before and after publication of the final document.
- The storage of information (electronic and paper).
- Information Sharing
- Data Protection
- Surveillance
- IGB approval of policy as appropriate.
- All policies to be part of a consistent framework

8.3.2. The IGB will identify and agree single issue policies. There will also be the opportunity to respond to legal and other developments.

Action Required

- IGB identifies and agrees policies required
- Establish priorities and timetable and approval process
- Implement timetable.

8.4. Information Audit

8.4.1. To comply with the requirements in the GDPR to evidence compliance, and to identify the correct solutions for IG, it is important to accurately identify the information assets

available and how the associated processes are operated. An information audit is required of:

- **The classes of held information:** This can be built on any foundation work done to establish a Records Retention Schedule and Publication Scheme. Both require review and updating to be finalised products. This work stream will aim to fill gaps by means of a corporate-wide commitment to the Audit.
- **Best practice** solutions for Information Governance (and, if resources allow, in comparable organisations). This will include the collating of information on all existing information management systems in use.
- **Human resources:** identifying levels of awareness and training amongst staff but also identify individuals who have IG skills and knowledge who can contribute to the implementation of the IG Strategy.

Action Required

- Establish terms of reference for audit
- Carry out audit
- Collate and analyse results
- Incorporate results into other work streams, e.g. best practice into File Classification System, human resources into Information Governance Structure and information audit into Information Asset Register and update of Records Retention Schedule and Publication Scheme as an interim measure if required.

8.5.Information Asset & Data Lifecycle Mapping Register

8.5.1. Effective records management requires us to accurately know what information we hold at any point in time. Legislation also requires that we maintain a number of public registers of information. For instance, the Freedom of Information Act 2000 requires us to have a publication scheme of all publicly available information held. To ensure consistency and reduce duplication, a single Information Asset Register is required which will:

- Ensure combined compliance with legislative requirements (building on existing Publication Scheme)
- Identify means of access to information – including under the file classification scheme (see below).
- Identify classification under the Information Security Policy
- Identify charges for accessing information (including charges for commercial re-use under the Re-use of Public Sector Information Regulations 2005)
- Identify retention period and necessary action at disposal (e.g. destroy or pass to the local Archive facility).
- Detail the flows of personal data and establishing whether the processing complies with the requirements of the GDPR

- Where possible, be available for public access.

Action Required

- Review any current registers etc.
- Agree format and content of the Register
- Populate the Register with information from the current records retention schedule etc.
- Collate new information (using results from Information Audit).
- Establish system (including responsibilities) for maintaining the Register
- Establish and deliver communications plan.

8.6. Corporate File Classification System

8.6.1. Agree and fully adopt a single, corporate system of file classification for both electronic and physical files. At this stage, only files and not individual documents will be required to be classified. Individual document management within files will be in accordance with file management procedures adopted by services or directorates, so long as they meet IG Policy standards.

8.6.2. The file classification system must also:

- Have a single corporately agreed basis for classification.
- Be simple to use.
- Allow for the tracking and location of file information at any stage in its life cycle.
- Allow for information relating to a single issue to be identified and collated quickly and accurately.
- Be compatible with the Register, IG Policy Framework and legal requirements for accessing information.
- Ensure privacy and confidentiality are appropriately respected and maintained (including compatibility with the Information Security and Data Protection Policies).
- Be achieved within existing resources – e.g. building on existing software such as introducing a mandatory file naming protocol for Microsoft Office documents and a standardised, mandatory Office directory tree based around the organisational structure or a similar logical and simple structure
- Allow for exceptions, where this meets statutory requirements, is a tolerable/manageable risk and/or is the value for money solution. e.g. where we already operate a “stand alone” file classification system that works well and is compatible with the aims of the IG Strategy.

Action Required

- Agree corporate file classification system.
- Set timetable for implementation (see also transitional arrangements)
- Communications and training on scheme.
- Monitor performance

8.7. File Management Systems

8.7.1. To ensure that individual documents can be located within files, we will be required to adopt file management policies following corporate guidelines. Many services will have effective systems in place already.

8.7.2. Adopting a single file classification system may not be practical and could disrupt already effective systems. Guidance will be agreed by the Information Governance Board based on the following principles:

- Systems should make individual documents readily available on any file.
- Where appropriate should ensure adequate security, confidentiality and privacy.
- Be simple to adopt and maintain.

8.7.3. Services will be responsible for adopting file management systems in accordance with any guidance issued.

Action Required

- Agreed guidance on file management standards.
- System for monitoring of service-level implementation of standards.

8.8. Transitional Arrangements

8.8.1. Full implementation of an effective records management system will take time.

Although records management is essential in an effective organisation, it needs to be done alongside other normal and often competing work demands. Compliance can be achieved over time through the agreement and adoption of transitional provisions for records management.

8.8.2. Transitional provisions will identify a timetable for full compliance with all records management policies. A date will be set for full implementation for all information created after that date. Lower levels of compliance will be required for other types of information, such as current and closed files, see the table below as an example:

Type of Information	Level of compliance
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New information or files	• Full compliance after implementation date
Existing files (at implementation date)	• An effective system of records management in place (compatible with the standards in this strategy, although not the corporate regime). • Compliance only with provisions relating to: ○ The closure, storage and retention of information. ○ Entry on the Information Asset Register.
Closed files	• Compliance only with provisions relating to: ○ The closure, storage and retention of information ○ Entry on the Information Asset Register.

8.8.3. Departments may bring closed and current files up to full compliance on a voluntary basis.

Action Required

- Agreed timetable for full implementation of records management policy and standards.
- Agreed transitional arrangements, e.g. as in table above.
- Communication of transitional arrangements

9. Charging and Income

9.1. We are embracing the Transparency drive for public service information but must also be pragmatic about the cost of making information available. Information may generate income, which in turn contributes to the cost of providing information. Charging may be lawful under access legislation or through the use of statutory charging powers under legislation, including the Local Government Act (2003) and the Re-use of Public Sector Information Regulations (2005).

9.2. We should seek to recover costs or generate income wherever allowed to do so. Consequently, a corporate wide charging approach is required to ensure:

- compliance with legislation
- consistent and reasonable charges are imposed
- income from information is maximised, where appropriate.

Action Required

- Audit of current charging regimes and income generation
- Corporate Information Charging approach devised, approved and publicised.
- Incorporate charging into the Asset Register (and/or publication scheme).
- Implementation strategy for Re-use of Public Sector Information Regulations 2005 and charging under LGA 2003.
- Audit of any information of commercial value.
- RoPSI Regulations approach approved and implemented

10. Communications and Training

10.1. The IG Strategy involves a cultural shift in the management of information. This builds on the cultural change that has already taken place on public access to information with the Freedom of Information Act (2000).

10.2. There are clear benefits to effective IG but it will involve time and effort by all employees and, like any change process, may meet reluctance. Successful implementation will require effective communication to raise awareness of the reasons for change, the new standards and training of key employees to cascade the new policies and procedures. Where required, this may include consultation on any significant changes, although the Information Audit anticipates employee contribution by identifying good Information Governance practice. A communications and training policy is required to:

- Raise awareness of the strategy and the direction of change
- To engage and involve staff (although the Information Audit should identify and engage key staff with Information Governance skills).
- To train on new policies and procedures as they are implemented.
- To establish an ongoing training programme on Information Governance issues (e.g. including FOI/EIR and DPA/GDPR) to provide detailed training to key staff and services.
- To integrate Information Governance into the induction process and the appraisal process as new procedures are implemented.

Action Required

- Review of existing training and communications on IG
- A comprehensive, corporate IG training programme using a range of training methods
- A communications plan for the IG Strategy implementation

- Integration of IG into HR policy and the induction process.
- Improving information management tools and information on the Intranet.

11. Integration with Existing Policies

11.1. The IG Strategy will impact on other policies and practices. It is important that IG is incorporated into these policies and that all policies are consistent. IG must also take into account equalities issues, such as equal access to information, particularly in respect of public access.

Action Required

- Identify the impact of IG policies on other policies (and vice-versa).
- Identify solutions, whether through appropriate amendment or otherwise.
- To otherwise integrate IG into existing policies and any contractual employment documentation regarding managing or maintaining the confidentiality of data.

12. Finance

12.1. This strategy is based on the assumption that implementation will be achieved through existing budgets and savings arising from effective records management. Savings should be made from the more efficient use of human, electronic and physical resources, thereby improving service delivery whilst reducing costs. It may be an unrealistic assumption, however, that all costs will be covered from existing resources. Some proposals and the general level of work involved may require additional resources during the implementation stages to realise the full efficiency savings arising from effective Information Governance. For instance, if the audit of current staff skills reveals a lack information management skills, it will be necessary to investigate training. It is unrealistic to expect income from information requests to cover the costs of public access to information.

12.2. Assessment of the resources implications of the IG Strategy needs to be undertaken as, otherwise, the result may be a reduction or redefinition in the scope of the work undertaken or the allocation of additional or redirected resources.

Action Required

- Identify the efficiency savings
- Identify the resource implications of IG strategy implementation.
- Assess how to meet any shortfall.

13. Monitoring and Review

13.1. To measure the success of the IG Strategy, a formal monitoring and review structure needs to be devised and implemented. This will include IG Performance Indicators, appropriate review mechanisms and sanctions for non-compliance.

Action Required

- Agree performance indicators and sanctions for non-performance
- Establishing monitoring system – i.e. to the Information Governance Board
- Establish programme of review for the IG Strategy and policies.

14. Next Steps: Implementation

14.1. The actions identified in this strategy are collated into an Implementation Plan below. Consideration will need to be given to whether there are additional projects ongoing or planned that may have capacity to pick up aspects of implementation:

Roles and Responsibilities

- Agreement of Information Governance structure.
- Establishment of Information Governance Board
- Identification of department level IG staff.
- Establishment of IG function
- Definition of audit and compliance plan, to include KPIs

Information Governance Framework

Review of existing policies in line with IG Policy.

Review and amendment of:

- Access to Records Policy.
- Information Security Policy
- Information Sharing Policy
- Surveillance policy
- IGB approval of policy as appropriate.
- Records Management Policy

Corporate Records Management Policy

- Review existing policy
- Update in accordance with IG Policy.
- Approval from IGB as required.
- Develop and deliver communications plan.

“Single Issue” Records Management Policies

- IGB identifies and agrees the policies required
- Establish priorities and timetable and approval process
- Implement timetable.

Information Audit

- Establish terms of reference for audit
- Carry out audit
- Collate and analyse results
- Incorporate results into other work streams, e.g. best practice into File Classification System, human resources into Information Management Structure and information audit into Information Asset Register and update of Records Retention Schedule and Publication Scheme as an interim measure if required.

Information Asset & Data Lifecycle Mapping Register

- Review current registers etc.
- Agree format and content of the Register
- Populate the Register with information from the current records retention schedule etc.
- Collate new information (using results from Information Audit).
- Establish system (including responsibilities) for maintaining the Register
- Establish and deliver communications plan.

File Classification Scheme

- Agree corporate file classification system.
- Set timetable for implementation
- Communications and training on scheme.
- Monitor performance

Service Level File Management Action

- Agreed guidance on file management standards.
- System for monitoring of service-level implementation of standards.

Transitional Arrangements

- Agreed timetable for full implementation of IG policy and standards.
- Agreed transitional arrangements, e.g. as in table above.
- Communication of transitional arrangements

Charging and Income

- Audit of current charging regimes and income generation

- Corporate Information Charging approach devised, approved and publicised.
- Incorporate charging into the Register (and/or publication scheme).
- Implementation strategy for Re-use of Public Sector Information Regulations 2005.
- Audit of information of commercial value.
- RoPSI Regulations approach approved and implemented

Communication and Training

- Review of existing training and communications on IG
- A comprehensive, corporate IG training programme using a range of training methods
- A communications plan for the IG Strategy implementation
- Integration of Information Management into HR policy and the induction process. Improving information management tools and information on the Intranet.

Integration with Other Policies

- Identify the impact of IG policies on other policies (and vice-versa).
- Identify solutions, whether through appropriate amendment or otherwise.
- To otherwise integrate IG into existing policies

Finance

- Identify the efficiency savings
- Identify the resource implications of IG Strategy implementation.
- Assess how to meet any shortfall.

Monitoring and Review

- Agree performance indicators and sanctions for non-performance
- Establishing monitoring system – i.e. to the IGB
- Establish programme of review for the IG Strategy