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<b>Report To:</b>	<b>Audit Committee</b>	<b>Date:</b>	<b>24 February 2015</b>
<b>Report By:</b>	<b>Corporate Director ICHCP</b>	<b>Report No:</b>	<b>CHCP21/2015</b>
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<b>Subject:</b>	<b>Information Governance and Management Update</b>		

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## 1.0 PURPOSE

- 1.1 The purpose of this report is to update Audit Committee on the current position with the Information Governance and Management Framework

## 2.0 SUMMARY

- 2.1 The Information Governance Steering Group (IGSG) was re-established at its meeting on 17 September 2013.

- 2.2 A considerable amount of scoping work was undertaken by the Information Governance Officer (IGO) in collaboration with the Council's Internal Audit and Legal Services, which provided the basis for a development workshop which was held on 29 October 2013 with the following objectives:

- Move forward the Information Governance and Management Framework.
- Test our readiness to submit our Records Management Plan under the Public Records (Scotland) Act 2011 (PR(S)A)
- Develop and implement a programme of staff awareness and training.
- Agree key actions and deadlines to take forward.  
Create opportunities for information management working groups to drive forward activities on behalf of the Information Governance Steering Group.

- 2.3 The IGSG key actions are to develop the Inverclyde Council (and Licensing Board) Records Management Plan under the Public Records (Scotland) Act 2011, and regaining momentum on implementing the Information Governance and Management Framework.

- 2.4 Organisational changes have already taken place to regain this momentum. These include:

- Information management working groups.
- Policy frameworks being reviewed and developed.
- Programme of training, awareness, education and communication.
- Development of an Information Asset Register to identify Information Asset Owners.
- Information Sharing reviews.
- Awareness of PR(S)A.
- Privacy Notice.
- Data Protection seminars.
- Training for mobile workers.
- Roll-out of CIVICA EDM

2.5 Information management working sub-groups are continuing to focus on specific issues of high importance to the Council, bringing together representation from across the organisation. These groups have been driving forward the agenda in their specific areas and coordinate activities on behalf of the IGSG.

2.6 New policies are being developed to provide clear statements of purpose, approaches to work and methods of application, taking into account relevant legislation. The following have been drafted:

- Records Management Policy
- Information Sharing Protocol

The main objectives of these policies are to lay down principles, identify responsibilities and ensure workable processes are in place to give guidance, aid understanding, encourage consistency and promote best practice amongst Inverclyde Council employees in order to deliver quality services within the Information Governance and Management Framework.

2.7 In relation to the audit action plan, of the 22 original actions only 2 significant actions remain. Progress is as follows:

<b>Action</b>	<b>Progress to date</b>
<p>Security Awareness will be promoted using materials such as brochures, posters or web based documents and through structured education/training programmes and computer based training. Training will be compulsory for all staff to create a security positive behaviour.</p>	<ul style="list-style-type: none"> <li>• Mandatory Information Governance e-learning developed for existing staff.</li> <li>• A new induction procedure for new starters is being developed where they will complete information security training before their start date.</li> <li>• The Training and Development team have been promoting the new training matrix at SMT meetings which includes mandatory information security training.</li> <li>• Information Security training has been delivered to mobile working staff.</li> <li>• A series of key communication messages to all staff are being sent on email and ICON to highlight information security awareness.</li> <li>• Legal Services have carried out Data Protection training and further training is planned for 2015.</li> </ul>
<p>Processes will be developed and implemented to strengthen the system of internal control over information governance and management. This will include;</p> <ul style="list-style-type: none"> <li>- Identifying owners for critical information and systems</li> <li>- Developing an options appraisal in relation to secure archiving facilities for appropriate hard copy records that must be retained in accordance with relevant legislation</li> </ul>	<ul style="list-style-type: none"> <li>• Services have populated a template detailing key information assets. This will then be reviewed to identify owners for each information asset/system.</li> <li>• An options appraisal will be developed outlining the preferred solution for secure archiving facilities for hard copy records and indicative costs by 31 March 2015. Benefits are already being delivered via the rollout of CIVICA Electronic Document Records Management System which is reducing the amount of hard copy records requiring to be archived.</li> </ul>

### **3.0 RECOMMENDATIONS**

- 3.1 It is recommended that Audit Committee note the progress and activities of the Information Governance Steering Group and its sub-groups.
- 3.2 Audit Committee is asked to note the progress being made on the outstanding Audit Committee actions.

**Brian Moore**  
**Corporate Director ICHCP**

## 4.0 BACKGROUND

4.1 The Information and Governance and Management Framework endorse a programme of activities which need to take place to ensure we have the appropriate controls in place to protect the information we hold and manage.

4.2 The IGSG identified the need for dedicated expertise to drive this work forward, and CMT authorised the recruitment of an Information Governance Officer (IGO). Since the IGO has come into post, this has allowed the capacity for robust scoping of the tasks that need to be undertaken, as well as considerable liaison with other local authorities that are either at similar or more advanced stages of the work programme.

4.3 This background work has been reviewed by the Information Governance Steering Group and has been used to evaluate our progress to date and identify milestones where some of these actions have taken place. However, further action is required to comply with the outstanding Audit Committee requirements, as well as supporting evidence for the Records Management Plan. A summary of the internal and external audit recommendations are:

- Security Awareness will be promoted using materials such as brochures, posters or web based documents and through structured education/training programmes and computer based training. Training will be compulsory for all staff to create a security positive behaviour.
- Processes will be developed and implemented to strengthen the system of internal control over information governance and management. This will include;
  - Identifying owners for critical information and systems
  - Developing an options appraisal for appropriate hard copy records that must be retained in accordance with relevant legislation

4.4 The IGSG Action Plan 2014/15 sets out the key actions required to help achieve reasonable assurance in information governance and also develop our Records Management Plan. Its key actions have already been identified below, and some of these are already being progressed.

- To prepare and submit a Records Management Plan under the Public Records (Scotland) Act 2011 to the Keeper of Records Scotland (the Keeper) by June 2015.
- Collate evidence to support the RMP, and devise a systematic method for on-going evidence capture.
- Identify Information Asset Owners (IAOs) and train them appropriately.
- Develop a Corporate Information Asset Register.
- Undertake an initial audit of existing policies, standards, guidelines and tools.
- Review our information sharing arrangements in accordance with the Information Commissioner's Data Sharing Code of Practice and the Data Protection Act 1998 – this is also likely to entail the need to review our existing Information Sharing Protocols (ISP) with a view to combining and updating to produce a single ISP across the Council and full Community Planning Partnership (Inverclyde Alliance).
- Delivery and monitoring take up of mandatory Information Governance training and awareness raising for staff across the Council and CHCP.
- Ensuring that EDRM work is harmonised with the requirements of our RMP.
- Develop a monitoring framework to oversee compliance with the RMP, Information Sharing Protocol, PSN Accreditation requirements and associated policies.

### 4.5 Public Records (Scotland) Act 2011 Inverclyde Council (and Licensing Board) Records Management Plan

The Public Records (Scotland) Act 2011 requires each local authority to prepare and implement a records management plan (RMP) which must set out proper arrangements for the management of

its records. A plan must clearly describe the way the authority cares for its records that it creates, whilst carrying out its business activities.

The Keeper of Records intends to invite Inverclyde Council and Inverclyde Licensing Board to submit their plan in February 2015, with an expected submission date no later than June 2015. It will then take a further 2 months for an interim report to the key contact and the Keeper's report to be published. The IGO is the Keeper's 'Key Contact' responsible for overseeing the Plan.

In assessing our state or readiness, changes have already taken place including;

- Assessing our current records management provision.
- Evidencing our progress to date.
- Associated RMP workstreams being carried out by the information management groups.
- Communication awareness raising.

#### 4.6 Information Management Working Groups

To facilitate the Steering Group's actions, and development of the RMP; the following Information Management Working sub-groups are now established.

- Records Management Working Group (including EDRM)
- Information Sharing Working Group
- Training Awareness and Communication Working Group
- Freedom of Information Working Group

The IGO has actively been arranging and coordinating meetings for all the groups to meet regularly and produces action plans for each which is fed back to the Steering Group.

#### 4.7 Records Management Working Group

In view of our current state of storage and requirements for the Records Management Plan, the group recognises the need to increase staff awareness to records management and develop a culture within the Council where services must adopt corporate approaches to records management. This will include good records house-keeping, archiving and destruction, filing and folder structures on network drives and designated staff responsible for day to day records management.

The group's priorities remain:-

- Secure archiving facilities for appropriate hard copy records that must be retained accordance with retention legislation  
The PR(S)A specifically requires a RMP to detail its archiving and transfer arrangements and ensure records of enduring value are deposited in an appropriate archive repository. In consideration of the reduction of physical storage space, cost saving commitments and modernisation, the Council is moving towards electronic storage of documents. Justification for not using electronic storage must be considered but there will still remain a hard core of documents that will need long-term storage accommodation under retention legislation.

An options appraisal will be carried out to identify indicative costs and a provision for long term storage in existing Council owned premises for our semi-current and permanent records. It is envisaged that paper archives will reduce over time in line with retention schedules, so an action plan be put in place to actively managed our existing records and reduce the current volume of our existing paper records.

- Identifying owners of critical information systems  
An information asset register (IAR) is being developed in conjunction with the information

classification scheme. The IAR is an important mechanism for understanding and managing our information assets and the risks to them, as well as identifying owners of the information asset. Services have already started populating their registers with information assets as well as vital documentation and critical computer systems. IARs require continuous maintenance and updating before they can be considered “finished”. The IGO is leading this piece of work and will see that there are processes in place for Information Asset Owners to update and ensure there are controls over our information assets .

- Records Management Policy

A new Inverclyde Council Records Management Policy has been drafted. Records management policies demonstrate commitment to effective management of records. It will:-

- Demonstrate to employees that managing records is important to the Council
- Provides a statement of intentions that underpins a records management programme.
- Serves as a mandate for activities for designated records management contacts.
- Provides a framework for supporting documents such as the retention and destruction policy.

- Records Management Manual

A manual for staff is being drafted which will provide more detailed guidance on how to implement best practice with regard to records management.

- Information Classification Policy

The policy is being updated to reflect the Government’s new protective marking classifications. An implementation plan will be drafted.

- Policy for the Retention and Disposal of Documents and Records Paper and Electronic and Business Classification Scheme

The existing retention schedule was last updated May 2012 and requires reviewing. Our approach is to look at a Retention Scheme model developed by the Scottish Council on Archives which has been designed specifically with Local Authorities in mind and is useful considering retention schedules and a business classification scheme. The model schedule has been issued to the RMWG in the first instance and will be central to the review.

#### 4.8 Information Sharing Working Group

The group has been reviewing our existing information sharing arrangements and have carried out mapping pilots across services. The pilots have been found to be very useful in helping to identify our current risks with information sharing, identifying gaps, how we share personal and sensitive information and what security controls we should have in place. It has highlighted that there are a lack of formal agreements in place, there is a need to always record what we share, strengthening data protection controls using classification and producing more awareness, information leaflets.

The development of an Information Sharing Protocol remains priority. It is proposed to further consult with some of our partners including the Police, River Clyde Homes, Fire Service, NHS GGC and the Scottish Prison Service at a workshop in March/April 2015.

To strengthen our evidence to comply with the Data Protection element, a public facing privacy statement has been produced and is on our website. The privacy notice tells people what we are going to do with their information, as well as their right to access information from the Council.

#### 4.9 Training, Awareness and Communication Working Group

Mandatory information governance training has been developed for all existing staff. The following 3 modules have been developed as e-learning on brightwave.

1. Information Governance – An introduction
2. Information Security
3. Records Management

All staff who have access to a pc will be required to complete the training and include them in personal development plans. Monitoring of the uptake of the training will be carried out corporately. Line managers with staff who do not have access to a pc will be required to provide them with basic information security awareness with a corresponding leaflet. All training and awareness must be completed during 2015/16. New induction procedures and a welcome pack are being developed for new starters.

Training and Development staff have been attending SMT meetings to promote training including the mandatory training via the new training matrix.

The Training Hub at Princes Street provides modern attractive facilities to ensure further training can be carried out to suit needs.

Key messages on information security are being sent to all staff on email and ICON. These are focused on topics to keep awareness alive and to remind everyone that the threats to our information security are real.

Data Protection seminars have been facilitated by Legal Services and more are planned for 2015.

#### 4.10 Freedom of Information Working Group

The group provides a forum for designated representatives to share good practice and any improvements required. This includes completeness of FOI records and the need to monitor responses to ensure they are responded to on time. The Council receives a significant number of requests, and whilst the majority of these are responded to on time, it does put pressure on the system and the limited resources we have. The group's key action will be refresher training for existing reps, awareness training for all staff and submitting performance reports including what has gone well for us.

## 5.0 PROPOSALS

- 5.1 It is recommended that Audit Committee note the progress and activities of the Information Governance Steering Group and its sub-groups.
- 5.3 Audit Committee is asked to note the progress being made on the outstanding Audit Committee actions summarised in this report.

## 6.0 IMPLICATIONS

### Finance

- 6.1 None identified as yet, however there may be a need to purchase external training and awareness. Any cost will be identified in a separate report

### Legal

- 6.2 The recommendations made in this progress report will be consistent with the Council's processes in line with legislative requirements, including the Data Protection Act 1998

### Human Resources

6.3 The Information Governance and Management Framework will place responsibilities on staff following review of the Code of Conduct in compliance with information governance, data protection and IT security responsibilities.

### **Equalities**

6.4 None at this time, although recognition will be given to the wider and associate equalities agenda.

### **Repopulation**

6.5 There are no direct repopulation implications arising from this report

## **7.0 CONSULTATIONS**

7.1 Consultation took place with the Information Governance Steering Group.

## **8.0 LIST OF BACKGROUND PAPERS**

8.1 Information Governance and Management Report to Policy & Resources Committee – February 2014