
Report To: Policy and Resources Committee **Date:** 7 February, 2012

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Inverclyde CHCP **Report No:** CHCP/13/2012

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Subject: INFORMATION GOVERNANCE AND MANAGEMENT

1.0 PURPOSE

- 1.1 Following the review of information governance and management a number of working groups were established. The work carried out has resulted in the compilation of a Framework which is recommended to be implemented as policy for the Council.

2.0 SUMMARY

- 2.1 As a Council, we require to ensure that we have the appropriate controls in place to protect the information we hold and manage. The first step required was to conduct a review to assess the level of awareness regarding Information Governance and management across the Council, and to understand current practice in this area.

- 2.2 Group sessions were facilitated for each Directorate, targeting those officers Heads of Service believed would positively contribute to the discussions. A pre-workshop questionnaire was completed by the majority of attendees which identified the key information sets that are accessed, stored and transferred by the organisation which were then discussed within the group breakout sessions.

- 2.3 The format of the workshop involved:

- a presentation which introduced the concept of information governance and management, highlighting examples of poor practice at a national and local level and what organisations are now doing to improve their processes
- a self-assessment questionnaire designed to understand how each individual perceives the Council's position to be against leading best practice
- Group breakout sessions to discuss key information sets used by services and rank them in terms of importance and sensitivity
- Short DVD on data protection act highlighting what could happen on any normal day and raising awareness of data protection issues that could occur

- 2.4 The scope of this review was intended to be strategic. Its aim was to provide an overview of what is a complex and wide-ranging subject matter and to provide a clear agenda for improvement. As such a number of working groups were established to explore the various themes which impact on the development of an information governance process. The Framework attached is the result of this work.

Appendix
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3.0 RECOMMENDATIONS

- 3.1 It is recommended that the Committee consider the attached Information Governance and Management Framework for approval as the overarching policy framework for this area of our responsibility.

It is also recommended that the Committee acknowledge that further reports will be presented which will provide the policy and guidance structure to underpin the framework.

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4.0 BACKGROUND

- 4.1 Good information governance and management is becoming an increasingly important area for all organisations. As a Council, we hold an ever-increasing volume of sensitive information, including information on our customers, employees and suppliers/stakeholders.
- 4.2 A spate of examples of information loss/theft in public sector organisations has highlighted the need to ensure that we are doing everything we can to avoid making the same mistakes. The consequences of such mistakes are not only resource intensive and damaging to reputation, but more importantly, can have serious detrimental effects on individuals affected - physically, financially and/or emotionally.
- 4.3 Acknowledging that this is an issue of good practice and quality assurance it is also important to note that breaches of the governance requirements could lead to financial penalty in addition to reputational cost.

5.0 CONSULTATION

- 5.1 The initial development of this piece of work involved a representative grouping of staff across service areas and also involved Heads of Service. Subsequently task groups were formed which expanded the range and level of consultation which has led to the compilation of this policy document.

6.0 IMPLICATIONS

- 6.1 Legal – The recommendations made in this report will bring the Council's processes in line with legislative requirements.

Finance – The Framework Policy in itself will have no direct financial implications. However it must be noted that further work aligned to the development of the strategy will require investment. It would be intended that this will be highlighted in future developmental reports.

Human Resources and Development – The policy will place responsibilities on staff and will require HR to consider how best we incorporate our expectation of staff in contracts and within the Employee Code of Conduct.

Equalities – The issue of equalities will be important within the framework in respect of how we best ensure that the management, handling and storing of information can be secured in such a manner as to meet our duty for access and sharing of information.



**INFORMATION GOVERNANCE
FRAMEWORK**

JANUARY, 2012

VERSION 3

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1.0 INTRODUCTION AND PURPOSE

- 1.1 Information Governance relates to the processes through which Inverclyde Council handles and manages all organisational information across Council services and with partner agencies. We also have a duty to ensure that though staff and partners are encouraged to share information that this is carried out within a secure environment. This is designed to protect against the risk of an information security breach concerning the sensitive information handled – in particular, personal and sensitive information of customers, partners, suppliers and employees.
- 1.2 Good information governance and management is a vital area of importance for all organisations as we move towards an increasingly mobile workforce and higher level of sensitive information held by us. Examples of information loss / theft has highlighted our need to ensure that we are doing all that we can to avoid the loss or theft of sensitive information. The consequences of such incidents are not only resource intensive to resolve, damaging to reputation, but more importantly can have serious and detrimental effect on individuals, physically, emotionally or financially.
- 1.3 Due to the sensitivity of information held, public sector organisations need to adopt formalised approaches to information governance. The Framework outlined in this document will facilitate the processes through which Inverclyde Council will bring together the requirements, standards and best practice which will apply to our management and handling of information.
- 1.4 The Framework is developed around five fundamental aims:
- To support the provision of high quality service through promoting the effective and appropriate use of information
 - To encourage staff to work responsibly, closely together, preventing duplication of effort and enabling more efficient use of resources
 - To develop support arrangements which provide staff with appropriate tools and guidance to enable them to discharge their responsibilities to consistently high standards
 - To enable organisations to understand their own performance and manage improvement in a systematic and effective manner
 - To develop a matrix of policies and guidance which will ensure that information is managed and handled effectively, legally, securely and efficiently
- 1.5 The purpose of this Framework therefore is to clearly define Inverclyde Council's approach to information governance and to support officers and elected members in handling information. The Framework outlines the responsibilities of managers and staff in respect of information governance when collecting, storing, communicating and transferring computer and manual personal identifiable information.

2.0 INFORMATION GOVERNANCE AND MANAGEMENT FRAMEWORK

2.1 Policy Statement

Inverclyde Council is committed to the secure use of information and information technology systems which are fundamental to the successful operation of Council business.

The Policy will be progressed through the Information Governance Management Framework overseen by the Corporate Management Team with a Corporate Director having a lead responsibility.

Through the Framework, the Policy will apply to all information received, created, held, shared, disseminated, disclosed, maintained, reviewed, retained or disposed of, by elected members and staff employed by the Council in the course of carrying out their duties. This covers all forms of information including electronic, digital and hard copy.

2.2 Aim

It is intended that the Framework will deliver the Policy consistently and effectively across the organisation at all levels. This will contribute to the achievement of Inverclyde Council's corporate goals. The approach will use best practice tools and techniques to manage information thus ensuring that information is:

- held securely and confidentially
- obtained fairly and lawfully
- recorded accurately and reliably
- used effectively and ethically
- shared appropriately, legally and safely
- transported securely and safely

2.3 Objectives

To facilitate the effective delivery of the Framework the following objectives have been developed:

- To manage information corporately ensuring cost-effective, timely and high quality information which will enable effective delivery of services to meet Council strategies and objectives
- To ensure that the infrastructure and processes within the Council can provide accurate and appropriate information to the 'right people' at the 'right time' for the 'right purpose' by:
 - Ensuring future information technology developments adhere to all relevant standards and improving current operational systems to comply with national standards
 - Improving business continuity arrangements
 - Improving information sharing and collaboration between partner agencies
- To promote a strong information governance and management culture across all elected members and staff
- Ensure that all staff and elected members are aware of their individual responsibility for managing information appropriately

2.4 Output

The Council aims to demonstrate the achievement of these objectives by:

- Ensuring robust systems of internal control in respect of information governance are in place and easily identifiable
- Incorporating information governance risk factors into all service reviews, project management and tender evaluation processes
- Regularly reviewing and monitoring of information governance arrangements will be clearly stated and enacted
- Ensuring that legislative responsibilities relating to information governance are met
- Ensure that the Framework will accommodate necessary change in respect of new information governance legislation, guidance and procedural requirements

2.5 Scope

This Framework focuses on all aspects of information within the Council, across all Directorates and services. Where appropriate strategic partnerships and specific projects will also be covered following engagement with partners. It will also be reflected in contractual arrangements for agencies that access the information systems of the Council, for example any consultants engaged.

3.0 RESPONSIBILITIES

3.1 When processing, storing communicating or sending information it is the responsibility of all individuals working in, and for, the Council to ensure that this is carried out in line with this Framework and the associated policies, procedures and guidelines.

3.2 Corporate Responsibilities

Through the development of this Framework and the implementation of associated policies, procedures and guidance there is a clear corporate responsibility on the Council to protect the information assets of the Council and its customers from unauthorised or accidental disclosure, modification, denial of access, misuse, loss or destruction. This will be enacted through the implementation of logical, physical and personal controls.

Further, there is a responsibility to use and share information, by legitimate users only, in accordance with legal and regulatory compliance and best practice. In particular, all Elected Members, employees, information systems and where applicable contractors and suppliers shall comply with the following:

- UK Government Security Requirements
- Official Secrets Act
- Public Records Act
- Data Protection Act
- The Computer Misuse Act
- The Copyright, Designs and Patent Acts
- Any relevant new laws or directions from UK or EU legislative bodies
- Any specific security requirements stipulated by the Council or by our customers

3.3 Elected Members

As elected representatives it is the duty of Members of the Council to operate within the approved policy framework and to take care to manage, handle, share and store Council information in a manner conducive with the information governance framework. This would be in accordance with the Councillors' Code of Conduct

Elected Members will also have a scrutiny role through the Committee processes and structures.

3.4 Chief Executive and Corporate Directors

The Chief Executive is the senior accountable officer for the enforcement of this Framework and associated policies and procedures. This responsibility will be progressed through the Corporate Management Team with delegated authority to each Corporate Director. An identified Corporate Director will take a lead role and assume responsibility for the implementation of the Framework and drive forward operational delivery of Information Governance arrangements.

3.5 Heads of Service

Heads of Service are responsible for ensuring the promulgation and implementation of the Framework within their areas of management and control. They shall ensure regular review and evaluation of the information security controls

and processes in their area of responsibility in order to provide and maintain the confidentiality, integrity and availability of all information assets.

3.6 Line Managers

All line managers have a responsibility to ensure that staff are familiar with the Information Governance Framework and supporting guidance. They should ensure that where officers have information risk management responsibilities this is reflected in their work objectives. There is also a responsibility to act on risks identified by staff which cannot be managed at employee level. Line managers should also ensure that incidents, where information security is breached for any reason, are appropriately recorded and highlighted through the appropriate management system.

3.7 Individual Responsibilities

As stated the key to effective information security is a positive and pro-active attitude by every individual. All Elected Members, employees, contractors and suppliers have a responsibility to ensure that information is protected against interference, misuse, theft or loss. They are also responsible for reporting to their line managers any security incidents that arise. Such responsible behaviour should ensure that information security procedures and controls are implemented effectively.

3.8 Steering Group Responsibilities

- (i) To monitor the implementation of the Information and Governance Improvement Plan. Key activities would include:
 - The promotion and awareness raising of the Policy
 - The development of a relevant communications strategy in respect of policies and procedures
 - Involvement in the development of appropriate training programmes
 - To provide assistance in the development of any processes aimed towards strengthening the system
 - Development of necessary standards and guidance which promote and co-ordinate information security across the Council
- (ii) Monitor and assess processes to ensure that the Council is compliant with relevant legislation, regulation and procedures.
- (iii) To maintain a scrutiny role in reviewing any issues where information security in terms of loss, theft or unapproved disclosure has occurred.
- (iv) Ensure that the Framework is amended in light of new legislation, policies and learning from practice.

4.0 COMMUNICATION

- 4.1 In order that the Framework is accessible to staff a communication plan has been developed which will enable access to both the Framework and the associated policies and procedures through the Intranet. Hard copies of the paperwork will also be available across services and where appropriate to partners.
- 4.2 The maintenance and updating of the Framework will be the responsibility of the Steering Group and again will be accessible both on the Intranet and through hard copy where necessary and appropriate.

5.0 ASSOCIATED POLICIES, PROCEDURES AND GUIDANCE

5.1 This Framework is underpinned by a number of policies, procedures and guidance notes which include:-

- Code of Practice for Elected Members
- Employee Code of Practice
- Acceptable use of Internet and Email Policy
- Policy for the Retention and Disposal of Documents and Records, both Paper and Electronic
- Guidelines for Protectively Marking Information

6.0 BACKGROUND AND CONTEXT

- 6.1 The integration of information governance and management within the culture of the Council can only be achieved through the full commitment and understanding of all stakeholders. They have a significant role to play in the development of a robust control environment within the Council in connection with policy setting, decision making, accountability, implementation of objectives, setting internal controls or in the provision of a safe working environment.
- 6.2 The Policy in respect of information governance is approved by the Council with responsibility for the implementation and delivery of the objectives lying with the Chief Executive and Corporate Management Team.
- 6.3 Operationally, an implementation and scrutiny process will be directed through the Information Governance and Management Steering Group. This Group will be chaired by a Corporate Director who will have lead responsibility, with a membership of staff representatives from each of the Directorates and other specialist staff as required. Specific sub groups can be formed to progress any particular tasks or security roles.
- 6.4 As part of the process of developing our approach to Information Governance a review of systems across the Council was initiated and covered the areas set out in Diagram 1 below:

Diagram 1



- 6.5 Taking account of the review and in order that we achieve the highest possible standards in the management and handling of information it is imperative that we secure the right balance between **people, process, organisation and technology**, in understanding the risk factors for the Council. Taking account of the review and the balance indicated, the Framework is as outlined within Diagram 2 below:

Diagram 2

