
Report To:	Policy & Resources Committee	Date:	24 March 2015
Report By:	Corporate Director ICHCP	Report No:	CHCP/28 /2015
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Subject:	INFORMATION GOVERNANCE AND MANAGEMENT UPDATE		

1.0 PURPOSE

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

2.0 SUMMARY

2.1 Since we last reported to Committee the following elements of the Information Governance and Management Framework have been progressed:

- Moving forward the Information Governance and Management Framework.
- Testing our readiness to submit our Records Management Plan under the Public Records (Scotland) Act 2011 (PR(S)A)
- Developing and implementing a programme of staff awareness and training.
- Information management sub-groups driving 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 continuing 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 sub-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 the PR(S)A
- Privacy Notice
- Data Protection seminars
- Training for mobile workers
- Roll-out of CIVICA EDM

2.5 We are now preparing to submit our Records Management Plan by 30 June 2015. A key aspect of the timetable for submission will be to maintain this momentum.

2.6 Information management sub-groups have been focusing 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.

2.7 The following policies have been developed to provide clear statements of purpose, approaches to work and methods of application, taking into account relevant legislation:

- 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.

3.0 RECOMMENDATIONS

- 3.1 That the Committee note progress and momentum regained on the Information Governance and Management Framework.
- 3.2 That the Committee note that Inverclyde Council and Inverclyde Licensing Board will submit its Records Management Plan by 30 June 2015
- 3.3 That the Committee agree that a progress report is submitted to the Policy & Resources Committee later in the year.

Brian Moore
Corporate Director ICHCP

4.0 BACKGROUND

4.1 The Information and Governance and Management Framework endorses 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 came into post in July 2013, it 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 actions have taken place. These include:

- Information governance and management responsibilities specified in job description, or in terms of conditions of employment including a confidentiality clause.
- Security awareness is being promoted using awareness raising materials such as brochures, posters, web based documents, training programmes and computer based training.
- External third parties who need access to the Council's information and systems are required to sign confidentiality agreements.

4.4 There is still some further action is required to comply with outstanding Audit Committee requirements, as well as supporting evidence for the Records Management Plan. These are:

- Development and implementation an information asset register in conjunction with the information classification scheme.
- Processes to be developed and implemented to strengthen control over information governance and management. This should include:
 - Identifying owners for critical information and systems.
 - Ensure that information asset owners are aware of their duties and responsibilities.
 - A preferred solution for archiving facilities for records that must be retained in accordance with relevant legislation.

4.5 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 30 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
- 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.

4.6 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 Scotland invited Inverclyde Council and Inverclyde Licensing Board to submit their plan no later than 30 June 2015. On receipt of our RMP an assessment process will begin after which a report will be submitted indicating whether the plan is agreed with or returned. The IGO is the Keeper's 'Key Contact' designated as having responsibility for submission of 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.
- Identifying a preferred solution storage of our records.

4.7 Information Management Working Groups

To facilitate the Steering Group's actions, and development of the RMP; information management 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.

4.8 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 is being 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. Greenock Municipal Buildings basement (GMB) remains the preferred option and an assessment is being undertaken to identify what area can be utilised. The Council also has a number of secure storage facilities that can be made suitable for our more permanent and archived records. It is envisaged that paper archives will reduce over time in line with retention schedules, so a work plan will 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 developed. 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 developed 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. The changes will be detailed in a separate report to Committee in May 2015 together with an implementation plan.

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

The existing retention schedule was last updated May 2012 and is undergoing a review. Service contacts are being requested to review the existing retention periods. A report on the changes and its implementation will be reported to Committee in May 2015.

- Electronic Document Records Management System (EDRMS)

CIVICA EDMS, an electronic records system has been rolled out in CHCP establishments: Children & Families & Criminal Justice staff Princes Street, Hector McNeil House and Home care staff at Wellpark, ICIL, Hillend and Greenock Health Centre.

Benefits are already being delivered via the rollout of CIVICA EDMS including:

- Reduction in the amount of hard copy records requiring to be archived and availability of space for large volumes of paper file storage
- Modern and efficient services.
- Compliance with data security policies.

- Reduced use of paper and other printing resources contributing to “green” ambitions as well as cost saving commitments.

The council are still exploring EDM as a long-term solution for its record storage and the HR function will next be piloted.

4.9 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.

The development of an Information Sharing Protocol remains priority. We will be consulting with partners including the Police, River Clyde Homes, Fire Service, NHSGGC and the Scottish Prison Service to engage their views on the Protocol with a view to them signing up to it.

An invitation will be drafted for our partners to attend a workshop on 15 April 2015 which will set out the aims and objectives of the workshop as well as feedback from the information sharing review. The workshop will also include Council colleagues who have been involved in drafting the Protocol.

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.

4.10 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.

4.11 Freedom of Information Working Group

The group provides a forum for designated representatives to share good practice and any improvements required. The group's key action will be refresher training for existing reps, awareness training for all staff and a submitting a performance report on FOI requests received for the period 1 January 2014 – 31 December 2014.

4.12 PSN Accreditation

The Council was awarded its PSN Compliance for 2014-15, effective from 28th November 2014.

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 ensure the Councils processes are in line with legislative requirements, including the Data Protection Act 1998, and the Public Records (Scotland) Act 2011.

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

- 9.1 Information Governance and Management Report to Policy & Resources Committee 4 February 2014