



DRAFT INFORMATION GOVERNANCE POLICY

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Date: March 2010

Approval: Executive

Audience: Council Officers

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Introduction

1. Information is a resource, like money, equipment, or staff skills, and like them needs to be managed and protected. It must be kept secure, especially when it is of personal, commercial, or political sensitivity. Information storage costs money and must be efficient. And there is a series of legal and other obligations on the council, as a public authority, with which it must comply.
2. The Information Governance Strategy describes how this policy will be put into effect through applying information assurance and information risk management.

Statement of Management Intent

3. The governance arrangements set out in this policy are intended to ensure business efficiency, effective service delivery, and compliance with the individual and social obligations the council has in respect of all the information it holds.

Policy Aims

Continuous improvement

4. It is the policy of the council to use risk management and quality assurance as management tools to achieving good governance. The policy aims for continuous improvement in the following:
 - operational management and strategic planning
 - performance management
 - service delivery
 - customer care
 - efficient administration
5. It is proposed that Information Governance for the Council is separated into four key themes:
 - Compliance with legislation
 - Data security
 - Data quality
 - Records management

The Information Assurance and Maturity Model as published by the Cabinet and CESG will be adapted for the council and will be used to assess the council's level of Information Governance maturity in securing the above themes.

Compliance

6. Compliance with the legal and other obligations in this area is to be seen not as a bureaucratic burden, but an opportunity to improve the council's relationships with citizens, clients and communities.
7. Compliance will be guided by providing more detailed policies and procedures covering special aspects of Information Governance. Where appropriate they will include corporate standards and may include their own implementation strategies. The principal policies will be:
 - Data protection
 - Freedom of Information
 - Data quality
 - Data security
 - Records management
8. These are likely to give rise to a further tier of policy in their turn.

Policy Management

9. Service managers are responsible for devising systems and practices for the delivery of their service that also comply with this and other information governance policies.
10. An understanding of this policy and its related policies is a basic competence for all managers. To support this, the Information Governance Officer will provide training and education, and ensure that the Intranet carries up-to-date versions of all relevant policy and advice.
11. The internal audit service (Veritau) will review compliance with information governance policies at both service level and corporate level in order to provide assurance on the objectives above. It will also review the achievement of the Information Governance Strategy associated with this policy.
12. Consultation on policy choices and the implementation of related strategies will be through the Corporate Information Governance Group (CIGG) representing internal stakeholders and chaired by the council's Senior Information Risk Owner (SIRO)¹.
13. This policy will be reviewed by the Information Governance Officer on an annual basis. Any proposed changes to the Policy will be considered by the council's SIRO. Any variations to the Policy will require the approval of the council's Corporate Management Team and the Audit and Governance Committee.

¹ See IG Strategy: probably the Director of Resources

14. As the council's internal audit, counter fraud and information governance service, Veritau Limited has responsibility for reviewing adherence to this policy and associated procedures.

Policy Awareness

15. Managers must familiarise themselves with this policy and all relevant Information Governance policies and procedures associated with their service area. They must also ensure that their staff are aware of the policy and appropriately trained in the relevant procedures.
16. All employees have an important part to play in the Information Governance policy. The council's disciplinary procedures may be applicable, subject to HR policy. This policy requires all employees to:
- take reasonable care of the information they access;
 - familiarise themselves and comply with information governance procedures;
 - act in accordance with any training they have received, or any verbal instructions issued to them;
 - report any information security incident, either to their manager or via an applicable security incident reporting procedure .