



Information Governance Strategy 2007

Introduction

- 1 This document describes how information should be managed so as to support the overall good governance of the Council. It complements other initiatives, especially the move to Hungate, which is the single most urgent driver for the strategy, and EASY.
- 2 Many of the other elements of this strategy are already in place and there is much good practice across the authority. Clearly, it is important that the Council's information resources are well managed and efficient, but equally they must also be seen to be efficient and well managed by others.

Purpose & scope

- 3 Information is an organisational resource in just the same way as money, property, and the skills and experience of our staff, and should be managed accordingly. Effective management includes a clear articulation of the policy framework, proper review processes, operational control, identified roles and responsibilities and performance management routines and procedures – to provide the proper infrastructure for supporting service delivery and enabling the Council to fulfil all its objectives.
- 4 The move to Hungate represents both a challenge and an opportunity - there is limited time in which to devise the new ways of working, prepare new forms of organisation, and implement data flow and records storage that will support the organisation in its new home – but a successful programme will also achieve the other aims of the strategy. Successful relocation to Hungate is the biggest single element of this strategy.
- 5 EASY relocates and rationalises customer data to improve all the services it covers (among its other aims). It is important that the new database is properly controlled and that all other filing structures are flexible enough to permit the re-engineering of processes, which alters document flow.
- 6 Partnership working is seen by government as crucial to service delivery. Effective partnerships need business and management information from each partner, and therefore systems that ensure information is “good” - accurate, timely, secure etc. The recent loss of personal data by HM Revenues & Customs is likely to lead to much higher expectations of data security, by both regulators and citizens.
- 7 The City Archive has been the subject of review by the Director of LCCS. The management of that service is outside the scope of this strategy but

there will be recommendations about the way the service should relate to the rest of the organisation, and this will be a factor in any future review.

Vision & objectives

- 8 This document foresees a council which:
- Maintains a relationship with each citizen that guarantees the protection of personal privacy
 - is publicly accountable for the decisions it makes and the services it provides
 - promotes participation in democracy and public life
 - understands its historic role within the city
 - manages information (instead of just storing it) through the use of technology and new ways of working, to serve citizens efficiently.
- 9 All of these derive from the corporate objectives of strong leadership and efficient management, which are in turn supported by the following aims and objectives:
- ensure compliance with all legislation, guidance, and codes of practice;
 - improve the value for money inherent in the information resource
 - generate reliable and authentic records that enable the council to assert its rights
 - support, enhance and protect the reputation of the Council;

Standards, legislation and policy framework

- 10 Annex A lists the most significant external standards. The Records Management Code of Practice is the single most important one affecting this strategy. Bridging the gap between present practice and the standard will be a huge challenge, but the reward will be control over all our paper and electronic documents, contributing directly to the vision and objectives above.
- 11 The code derives from the Freedom of Information Act. This, and the Data Protection Act, are the most significant statutory obligations. The Code has statutory force. Both Acts now have a significant body of case law, guidance, statutory instruments and other codes.
- 12 In response to these, the council has already devised a framework of policies and procedures for managing information, fulfilling citizens' rights

and completing its obligations. All are to be reviewed, but the Data Protection Policy is in urgent need of improvement.

Risk Management

- 13 Failure to manage information well introduces serious risks. Poor information means sub-optimal decisions, with consequent financial or political implications. Staff morale will suffer if information systems do not support officers efficiently in their work.
- 14 Financial risks arise directly from:
- erroneous disclosure leading to a claim for damages (by an individual or an organisation), or
 - records not being available to enforce legal rights.
- 15 The EASY CRM already collects customer data into one place where it can be managed well - and visibly so to the customer. This helps reduce reputational (and political) risk, which arises if information is unavailable in the right place at the right time, or if incomplete or biased information is wrongly disclosed.
- 16 In addition the objective of promoting participation in public life may be compromised if information is wrongly withheld after a faulty public interest test.
- 17 The Audit Commission has identified information security as a corporate risk and reported¹ on officers' lack of awareness of policies and procedures. Relevant items from the resulting action plan, intended to reduce the risk, are incorporated into this strategy

The Strategy

- 18 Annex B includes a review of various features of information governance, by the Information Governance Working Group, which underpins the assessments in this section.

Part 1 – current position

- 19 Records management has a low profile and little resource is devoted to it. There is no culture (at least not a consistent one) of devoting time to writing up working papers, weeding files and folders, and closing the file at the end of every job. Business and customer records are often well

¹ *Your Business @ risk – survey feedback*; Audit Commission, September 2007

- managed in large specialist databases, but management records are not, because they are so much less predictable. Filing systems, including shared network areas, are not planned or regularly reviewed and weeded. As a result, there are large volumes of paper files; electronic records are duplicated as every reader saves his or her own copy; drafts and early iterations, and reference material copied from websites (and of only temporary value) fill file-servers and are not deleted; email folders that have exceeded their permissible size are reduced by mass deletion rather than intelligent selection; libraries of scanned documents simply grow into, and fill, ever larger servers.
- 20 The 2001 Data Protection policy is not a good one. Procedures tell people what to do; policies tell them how to make their own decisions correctly. The Act is based on abstract outcomes, so we need a policy that sets SMART outcomes and then explains what is mandatory and what is permissible in achieving them, and what factors should be taken into account when deciding. The Audit Commission report indicates that awareness of this policy, and others in the field of information security, is low.
- 21 Partnership working requires the efficient transmission of both business and management data between partners. The rules, or arrangements, for this – and especially those for ensuring DP compliance – are often called “protocols”. Some of those in use are, like the DP policy, simply statements of intent rather than working documents that guide officers. In other cases they don’t exist at all, and we rely on common sense to get the job done. Data sharing for debt collection operates erratically. Some services see other council departments as separate organisations, and some are less willing to disclose data internally than to their external partners.
- 22 There is no CYC policy on what the historic Archive should collect from within the council, and therefore no mechanism for a service department to send a record, nor for the Archives to ask if it does not appear. This has already led to gaps in what one would expect to be a complete sequence beginning long ago – the annual statement of financial accounts missing, for instance. There is also a problem with modern media, which may be physically unstable² or vulnerable to obsolescence³. These are likely to compromise the value of the historic record in future, independently of the physical location or organisational management of the service. These last

2 eg laser printing on acid-rich paper

3 eg electronic data needing to be decoded by special software - the “Betamax video” problem. The National Archive has already discovered that emails dating from the 1980s cannot be opened because the software no longer exists.

are being reviewed elsewhere, but the value of the information archived is properly an aspect of this strategy.

- 23 The policy framework, other than the DP Policy, is sound. Policies on Fol and records management should be reviewed. Departmental records management policies have not been updated for the current directorates and do not have complete R/D schedules. But procedures for providing information operate reasonably well. The EASY project has already begun to reduce duplication of customer data, by introducing the Customer Relationship Management system (CRM), and improved the publication of information on the website. The Publication Scheme fulfils the council's legal duty⁴ but is of little practical use to staff or customers.
- 24 Annex A includes an analysis of how the council has improved in the past four years. The analysis shows what more could be done; the strategy below describes how it can be achieved, and why it is desirable to do so.

Part 2 - where do we want to be in the future

Features of a well-organised environment would include:

- 25 Clear desks. Sound records management means a place for everything and everything in its place. Information is not stored in piles on the corners of desks, but labelled and indexed in files and folders, and easily accessible when required. This is a psychological as well as a physical aspiration, and contributes positively to time management⁵ and morale as well as to business efficiency.
- 26 Information flows. We know what we've got and where it is, and it either moves automatically to the next correct place, or it can easily be retrieved by whoever needs it next. If it's deleted, we know (vital in responding accurately to Fol enquiries). Availability to users includes internal and external users and the public and this is enhanced by clear signposting, through the Publication Scheme, and simple access and charging.
- 27 Corporate standards for filing and indexing systems. One interesting feature of EASY is the adoption of the Local Government Services List as a basis for classifying work; this should become a corporate standard. Below that there must be scope to accommodate service-specific legislative and perhaps even historic variations.

⁴ Under Section 19 of the Freedom of Information Act 2000

⁵ Do one job at a time; when it's as near complete as possible, put it away and get the next job out. Completion includes writing up, weeding, and preparation of the closed file.

- 28 It will be important to review the operation of the CRM database to ensure that, as its value as a resource for sharing grows, the policy keeps pace with changes of use and compliance is maintained.
- 29 Privacy statements for every service. Customers can easily confirm that we are processing their data correctly because services understand, and can explain, how the data protection principles apply to every transaction.
- 30 Efficient information sharing with partners including neighbouring authorities. Transmission could be by any suitable medium, including granting access to CYC databases. Sharing for debt collection and enforcement of other legal rights will be well understood by both officers and citizens, and governed by documented procedures. The Information Commissioner's code on data sharing is a key source, and his accreditation for our agreements should be gained.
- 31 Archived records are accessible to officers and public, and build a complete historic record. Modern or semi-live records may or may not be stored with historic records, but are still easily accessible.
- 32 Make proper use of ID cards without losing trust of citizens.
- 33 All the aspects of information management above, such as protecting personal privacy, are integrated into the council's culture and ethos. Staff induction and training ensure that all are aware of the reasons why security arrangements, or other procedures, are as they are. Meeting the promises in the Charter is second nature. Privacy and accountability are skills of "unconscious competence".

Part 3 – How do we get there?

- 34 The overall strategy is to improve the council's performance by strengthening the policy framework; audit; and information and training. The framework will include rules, or protocols, on filing, indexing and cataloguing documents. Other elements of this strategy are policies on data protection and sharing data.
- 35 Officers involved in partnerships will also need guidance, especially on preparing or entering data sharing protocols and improving existing ones. The North Yorkshire 3-tier protocol should be reviewed (by the relevant partners) in the light of the Information Commissioner's Framework guidance. An improved Data Protection Policy should assist the development of specific guidance, but non-personal information and its disclosure under Fol also needs managing.
- 36 Hungate presents an opportunity to "clear out the basement". The three main elements of that task are as follows.

- 37 Service-by service review of how to make records management work. Identify what there is; devise retention & deletion schedules; a template action plan is required. Pilot services will be needed to test the process.
- 38 Decide whether to throw away, store off-site, or scan – business case needed for each element of service. Management records will be more problematic than business records.
- 39 Each business case must take account of other changes at Hungate. The project encourages new ways of working, and relocation of services relative to each other. A decision may need several iterations, or permutations of choices.
- 40 Apart from Hungate, other tasks include service privacy statements being reviewed within routine internal audit of information management compliance. Some elements of each statement will be generated by the records management work above.
- 41 The Publication Scheme must be reviewed by the end of 2008. It could become a useful attribute of the provision of information, and perhaps be incorporated into the operation of the website.
- 42 A communications strategy and training programme must be aimed at all levels of staff so that appropriate levels of instruction, training and explanation (and invitation to challenge) are provided.

Medium term action plan

- 43 The cost, in time and money, of achieving these outcomes is not yet known. For each service there must be research to estimate how much information is held, how much can be disposed of, prepare a business case for storage or scanning of what's kept, and then carry out the work. The DMS project will want an early indication of the total costs, so pilot studies in suitable services must begin immediately. Several services have already volunteered.
- 44 Such a service-by-service programme will require commitment from CMT downwards to ensure managers allot time and resources to do the work. It will also require dedicated programme management. Only if CMT's commitment is applied by a programme manager with the relevant knowledge and skills will this aspect succeed. The move to Hungate already involves significant culture change, to which this element adds both further challenge and time-consuming work. Both require clear and decisive leadership supported by a detailed programme, managed according to effective principles.

45 Milestones:

Milestone	timeline
Indicative action plan	Feb 2008
Adoption of revised data protection policy	Mar 2008
Adoption of policy on data sharing	June 2008
Revised publication scheme	Oct 2008
Completion of service privacy statements	Dec 2008
Completion of business case for storage or scanning by every service	Dec 2008
Completion of each service records management project	Dec 2009

- 46 The elements of the programme are projects based on improving information governance in each service. Circumstances - eg legislative and regulatory requirements, culture and history – mean that although policy can and should be developed corporately, implementation is likely to vary enormously. Therefore a policy-and-audit approach is required. Further, the scope for choice within services will alter as other projects suggest different parameters – especially the “new ways of working” stimulated by the move to Hungate.

Information Governance Strategy and relationship with other projects

- 47 The principal elements of the strategy are listed in the table below and their overlaps with other projects identified. The table also serves as a check-list of the projects making up the overall information governance Programme.
- 48 The strategy outlined below would be applicable, necessary and deliverable in any local authority. But at York there are already other programmes in progress with which synergy can be gained – or lost. Each could be completed separately. But there are overlapping areas where work will contribute to more than one project, reducing the overall total.

	Info Mngt	Hungate	EASY	IT devt plan
Communication strategy	✓	✓	✓	✓
Records Management:				
Complete file indexes & R/D schedules ⁶	✓		✓	
Reducing paper storage	✓	✓		
scanning	✓	✓		✓
Document management	✓		✓	✓
New ways of working	✓	✓	✓	
New ways of printing		✓		✓
Information Governance policy framework				
Induction, teaching, training, explanation	✓	✓	✓	✓
Partnerships & data sharing	✓		✓	
DP Policy	✓		✓	
Data Sharing Policy	✓		✓	
Improving the archive	✓			
Review of Publication Scheme	✓		✓	

49 The move to Hungate is one such project. The main overlap here is the reduction in on-site storage of paper records. DMS is another, with the

⁶ including generic records – finance, HR, performance management

same objective. If efficiency can be improved by introducing DMS, so much the better, but of course more work is required to configure it well. EASY is a third. EASY consciously seeks to improve efficiency by improving customer contact and thus stimulating a review of work flow from front to back office – and perhaps the boundary between the two. The Hungate project is looking for new ways of working, including hot-desking, home-working and moving services nearer to their customers – a deliberate echo of the re-engineering inherent in EASY and implicit in DMS.

Annex A

Background: legislation & regulation

the **Data Protection Act** 1998 (“DPA”) and Information Commissioner (and other) guidance under it, on

- Employment records (the “Employment Practices Code”)
- Information sharing with partners
- Guidance for elected councillors
- Warning of potentially violent customers
- Data matching
- Rights of access by data subjects
- CCTV
- Photographs in schools
- Notification and annual registration

The **Freedom of Information Act** 2000 (“Fol”) and its two codes of practice:

- fulfilment of duties (the “Section 45” code)
- records management (the “Section 46” code). Of all the items in this list, records management is the biggest single area for improvement and has the greatest contribution to make to other council initiatives. It has further implications for the Archives service and the management and retention of electronic records.

guidance on exemptions as issued by both the Information Commissioner and the Department for Constitutional Affairs.

The **Environmental Information Regulations** 2004 (“EIR”) and guidance from DEFRA

The **Regulation of Investigatory Powers Act** 2000 (“RIPA”), which regulates surveillance and other crime prevention methods

The **Re-Use of Public Sector Information Regulations** (“ROPSI”)

Annex B

Where we were, where we are, where we want to be

	where we were in 2004 is shaded grey			Where we are in 2007 is typed in bold			Where we want to be in 2010 has a bold outline
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	1 failing	2 poor	3 inadequate	4 satisfactory	5 above average	6 good	7 excellent
Policy framework	absence	Some polices exist but do not guide officers	Only some policies guide decisions	All policies interpret external requirements & guide decisions	Policies are well understood & embedded	Some elements have been recently reviewed	Every element embedded & regularly reviewed
DP policy	absence	policy exists but officers not aware	policy exists but does not guide decisions	interprets external requirements & guides decisions	well understood & embedded	As 5 & recently reviewed	As 6 & regularly reviewed
FoI policy	absence	policy exists but officers not aware	policy exists but does not guide decisions	interprets external requirements & guides decisions	well understood & embedded	As 5 & recently reviewed	As 6 & regularly reviewed
Corporate RM policy	absence	policy exists but officers not aware	policy exists but does not guide decisions	interprets external requirements & guides decisions	well understood & embedded	As 5 & recently reviewed	As 6 & regularly reviewed
departmental RM policies	absence	policy exists but not updated for new directorates; R/D schedules	policy updated but no R/D schedules or other procedures	Policy & procedure complete but not carried out	Policy & procedure well understood and embedded	As 5 & recently reviewed	As 6 & regularly reviewed

Annex A

		and other procedures incomplete					
Business records in practice	Records incomplete and not easily retrievable; may be out of date or duplicated	Records structured but duplicated and inconsistent or incomplete	Records complete but not weeded or closed. Mixed media records not cross-referenced	Live records complete and in good order inc. meta-data	As 4 but records weeded, & closed records separated	As 5 but R/D schedule in practice	As 6 but historic records (inc list of deletions) secure
management records in practice	Records not easily retrievable or related to management functions; may be out of date or duplicated	Records partially structured but dependent on officers' own knowledge; shared access inconsistent	Records structured but dependent on officers' own knowledge; not weeded or closed. Access inconsistent	Folder structure and officer access to them match management functions; closed records removed	As 4 plus version control in practice	As 5 plus wider access through CouncilNet in practice	As 6 plus historic records secure
RM skills knowledge & competence	RM skill limited to specialist services⁷ and not shared or applied to management of those services	RM recognised as a corporate requirement	HR implications of S 46 code linked to HR practice	RM included in all relevant JDs & training plans	Posts filled in accordance with 4	As 5 plus service managers have working knowledge of RM	S46 compliance regularly reviewed and found as 5

⁷ ie libraries & archives