ITEM NO. ....

CORPORATE INFORMATION GOVERNANCE POLICY – IMPLEMENTATION PROGRESS REPORT

SUMMARY REPORT

Purpose of the Report

1.   To update the Audit Committee on progress with the implementation of the Council's Corporate Information Governance Policy.

Summary

2.   This is the second six monthly progress report on the implementation of the Corporate Information Governance Policy approved by Cabinet in February 2008.

3.   The report concludes that progress has continued in all areas of information governance across the Council as a direct result of the Corporate Information Governance Policy.

Recommendation

4.   It is recommended that the Audit Committee note the continued progress in the area of corporate information governance.

Reasons

5.   The recommendation is supported to provide the Audit Committee with evidence to reflect on the Council's information governance arrangements.

Paul Wildsmith
Director of Corporate Services

Background Papers

  (i)   Corporate Information Governance Policy
 (ii)   Corporate Information Governance Group Work Programme
(iii)   Corporate Information Governance Policy Implementation Progress Report to Audit Committee in June 2008

Ciara Shimidzu: Extension 2931

S17 Crime and Disorder	This report has no implications for crime and disorder.
Health and Well Being	There is no specific health and well-being impact.
Sustainability	There is no specific sustainability impact.
Diversity	There is no specific diversity impact.
Wards Affected	All wards are affected equally.
Groups Affected	All groups are affected equally.
Budget and Policy Framework	This report does not recommend a change to the Council's budget or policy framework.
Key Decision	This is not a key decision.
Urgent Decision	For the purpose of the "call-in" procedure this does not represent an urgent matter.
One Darlington: Perfectly Placed	There is no specific relevance to the strategy beyond a reflection of the Council information governance arrangements and improving public access to information.

MAIN REPORT

Information and Analysis

Background

6. In February 2008 Cabinet approved a Corporate Information Governance Policy (min ref C175/Feb/2008) in order to formally establish a strategic framework addressing the requirements that the law, ethics and policy place upon information and records management. The Policy is designed to ensure the systematic adoption of information management principles to underpin the Council's operations and service delivery.

7. Implementation of the Policy is led and monitored by the cross-departmental Corporate Information Governance Group (CIGG), chaired by the Head of Corporate Assurance. This group has also been given a mandate to approve information governance related policies and has been tasked to produce 6 monthly progress reports to the Audit Committee. This is the second such report. All reviews of the Corporate Information Governance Policy will be overseen by the CIGG and any fundamental changes will be presented to Cabinet for approval**.**

8. The Policy comprises of six workstreams that correspond to the components of information governance and has initiated an ongoing, phased and collaborative approach to implementing information governance best practice throughout the Council using the following methods:-

    (a) The creation of a **strategic framework** of records and information management policies and protocols, standards and guidance for all employees and members, for example a Data Quality Strategy and revision of existing information governance policies to reflect changes to legislative requirements and international quality standards;
    (b) The development of information governance **Centres of Excellence** across the directorates where the above strategic framework is adopted, as appropriate;
    (c) Contributions to **Leading Edge Projects**;
    (d) The creation of **Staff and Member Training Modules** for the Workforce and Member Development Programmes to provide them with a core understanding of the importance of good records management and information rights legislation in their operational duties, for example, the role of the Data Protection Act in information sharing.
    (e) Using **business as usual enquiries** as another implementation mechanism for the principles and outputs of the policy. This is becoming an even more effective implementation tool as the Information Governance Team is receiving a growing number of requests for support and guidance in all areas of information governance.

Progress made on implementing the Policy

9. The positive progress made **since the last update report in June 2008** is outlined below through each of the implementation methods and **Appendix A** provides details of the key outputs across each of the Policy's six workstreams in the form of a matrix:

(a)   Strategic Framework

Tasks completed:
  (i)   Data Protection Policy Guidance – CCTV Management and Safe Haven corporate guidance circulated to all managers and data protection DO's and DON'Ts circulated to all staff via the Flyer.
 (ii)   Freedom of Information Policy Guidance – request handling procedures corporate guidance circulated to all managers and FOI DO's and DON'Ts circulated to all staff via the Flyer.
(iii)   Information and Data Security Briefing – based on the recently published LGA Local Government Data Handling Guidelines and circulated to all managers.
 (iv)   Creation of a Data Quality Policy – outlining the Council's procedures, standards and training for satisfying the Comprehensive Performance Assessment's Key Lines Of Enquiry on data quality, such as a data quality standards on metadata and data quality management procedures.
  (v)   Revision of the Council's Information Security Policy and Guidance – outlining the Council's governance, procedures, standards and training for the security of all information, such as secure access rights to databases containing sensitive personal information and "clear desk" policies. This policy will ensure compliance with national regulations covering secure data handling and management (Local Government Data Handling Guidelines) as well as complying with the ISO code of practice on information security management (ISO 27002). This policy will be taken to the Joint Consultative Committee for final approval early in 2009.

Tasks in progress
  (i)   Data Protection Policy Guidance – Code of Practice and Toolkit on Sharing Personal Data, based on the Information Commissioner's Offices' code of practice and referencing the regional, multi-agency information sharing protocol. The Toolkit will provide staff with sample information sharing and disclosure agreements and privacy statements.
 (ii)   Records and Information Management Policy Guidance on document and email management.
(iii)   Creation of an Environmental Information Regulations Policy and Guidance – outlining the Council's procedures and standards for complying with the Environmental Information Regulations 2004, such as processing requests for information.
 (iv)   Creation of a Re-use of Public Sector Information Policy and Guidance – outlining the Council's procedures for complying with the Re-use of Public Sector Information Regulations 2005. Due to the large amount of information that is available in the public domain, including information released through Freedom of Information requests, the Council has a statutory duty to manage that information's re-use or re-sale.

(b)   Centres of Excellence

  (i)   Children's Services - Human Resources Personal Files: a file plan (i.e. a structured plan for organising files of information) and retention schedule for all the documents stored in a Human Resources Personal File is still in development.

(ii) Council Tax/Housing Benefits Alignment – participated in a project meeting and awaiting further development.

(iii) Document Management Strategy (Legal Services) – Legal Services are participating in a health check on data management and security (see paragraph (e) below).

(iv) Planning Review – provided information governance input into the Review and been involved in some of the software demonstrations for the proposed Planning Portal and document management system.

(v) Adult's and Children's Social Services – Case File Management Review: targeting business critical areas in the management of client case files in social care, such as developing a Document Control proposal including implementing a revised file plan and retention schedule; developing and implementing a file plan and retention schedule for all electronic documents stored in CareStore (ESCR system – electronic social care records system).

(vi) All of the above are very involved pieces of work demanding staff time from the department. With the exception of CareStore, which has been delayed due to software and technical issues, these tasks are progressing.

(c) Leading Edge Projects

(i) Administration Review – Typing: developing and assisting in the implementation of a file plan and retention/destruction schedule for the Typing Team in Community Services which will be carried across the Council in line with the Administration Review to make information management, storage, sharing and retrieval more efficient.

(ii) Stockton-Darlington Partnership: providing information sharing support, guidance and tools to the partnership to ensure compliance with the Data Protection Act 1998.

(iii) Accommodation Review: input information governance requirements into the revised Project Plan and awaiting developments from the Project Manager.

(iv) Complaints Review: input information governance requirements into the Project Plan and specification for the Corporate Complaints system and awaiting developments from the Service Manager.

(v) Organisational Development Strategy (HR): agreed with the Head of HR to be involved with the HR Succession Strategy and awaiting developments from the appropriate Manager.

(d) Staff and member training modules

(i) Since the last update report the Corporate Information Governance Roadshow (i.e. the process by which the Information Governance Team raise staff awareness on information governance and the Corporate Information Governance Policy) has visited the PA Network and Transport Section Heads; published 3 editions of The DIGGR (Darlington Information Governance Relay); revamped the Corporate Information Governance intranet pages on i-Darlington; and circulated management briefings as appropriate on topics such as, data handling and data transfer.

(ii) Learning and Development Directory (staff training directory) – the new directory next year will include two new staff awareness sessions covering Information Rights and Records and Information Management.

(iii) The revised Corporate and new Management Induction Sessions will each include a session on Data Protection that will include Data Security and Quality Assurance.

(e) Business as usual

(i) Processing information requests under the Freedom of Information Act 2000, Data Protection Act 1998 and Environmental Information Regulations 2004 – a breakdown of the requests received between April and September 2008 is shown in the tables in **Appendix B**. The tables illustrate not only the high number of requests the Council receive, in line with regional trends, but also which directorate receives the most requests and the most common requestor.

(ii) Publication Scheme – the Council's Publication Scheme has been updated and developed so that it links directly to published content on the council website (see Cabinet meeting, 2 December 2008).

(iii) Personal Data Transfer Survey – undertaken to assess the security of transfers of personal data within the Council and with external partners. Each Service Area has received recommendations and agreed an action plan for improvement, where appropriate.

(iv) Information governance health check – the Corporate Information Governance Team in conjunction with Internal Audit and with the support of PricewaterhouseCoopers are developing an information governance risk assessment methodology that can be used across the Council. It has been tested on two service areas in Corporate Services to ensure that it is a practical tool.

(v) Records and information management and governance advice, support and guidance: Estates Management – developed a retention schedule; Dolphin Centre – ensuring compliance with the Data Protection Act 1998 and providing records management advice; Cultural Services – developed a retention schedule for the Arts Centre and Civic Theatre which will then be cascaded to the rest of division; National Fraud Initiative – ensuring that all the data sharing and transfer procedures comply with the Data Protection Act 1998; Business continuity plans – developing and providing information asset registers to accompany service area business continuity plans, focussing on Category 1* and 1 services first; CCTV – developed CCTV Management Guidance and organised a workshop for staff in March 2009; Tourist Information Centre – provided a retention schedule to assist in the office relocation; and Houndgate Offices – provided a retention schedule for Public Protection and Cemeteries and Crematorium as part of their preparation for the office relocation.

Conclusion

10. To summarise, progress has continued in all areas of information governance across the Council in the last 6 months as a direct result of the Corporate Information Governance Policy. The Corporate Information Governance Team is targeting service areas that require urgent assistance as well as delivering a strategic framework for the whole Council and developing approaches to managing information requests.

Outcome of Consultation

11. There has been no formal consultation in the preparation of this report.

Appendix A: Corporate Information Governance Policy Workstreams and Implementation Matrix – tasks completed and underway since the last report

	Information Governance Policy Workstreams					
Information Governance Policy Implementation methods	**Managing Information Governance**	**Records Management**	**Compliance**	**Information Security**	**Data Quality**	**Knowledge Management**
Strategic Framework	Reviewing the Corporate Information Governance Policy and planning Phase 2 (Dec/Jan 2008)	Create an Archives Policy (Jan 2009) ; circulate guidance on good records and information management (Jan 2009)	Create the Environmental Information Regulations and Re-use of Public Sector Information Policies (Jan 2009); revise and update the Council's Publication Scheme (Dec 2008); create a data sharing code of practice and toolkit (Dec 2008); circulate guidance on Freedom of Information and Data Protection (Jan 2008).	Review and revise the Council's Information Security Policy (Dec 2008); briefing paper on data security for managers (Dec 2008).	Create a corporate Data Quality Policy (Oct 2008); create Corporate Data Matching Code of Practice (Dec 2008). NB: some of the actions flowing from the Data Quality Strategy have been put on hold pending the outcome of the information governance health check (see section 5 (e)).	This workstream has been put on hold pending the next Senior Manager's Network meeting and the Knowledge Management presentation.
Centres of Excellence *		Children's Services H.R. Personal Files – extended into Corporate HR Retention Schedule (Winter 2008); Adult and Children's Services Case File Management Review	Children's Services H.R. Personal Files – extended into Corporate HR Retention Schedule (Winter 2008); Adult and Children's Services Case File Management Review (Winter 2008/9) and CareStore (Winter	Children's Services H.R. Personal Files – extended into Corporate HR Retention Schedule (Winter 2008); Adult and Children's Services Case File Management Review	Council Tax and Housing Benefit Alignment (Spring 2009)	

		(Winter 2008/9) and CareStore (Winter 2008/9); Document Management Strategy for Legal Services (overtaken by the Information Governance Health Check (Winter 2008/9)	2008/9); Document Management Strategy for Legal Services (overtaken by the Information Governance Health Check (Winter 2008/9)	(Winter 2008/9) and CareStore (Winter 2008/9); Document Management Strategy for Legal Services (overtaken by the Information Governance Health Check (Winter 2008/9)		
Leading Edge Projects *		Admin Review – Typing; Stockton-Darlington Partnership; Accommodation Review; Complaints Review	Admin Review – Typing; Stockton-Darlington Partnership; Accommodation Review; Complaints Review	Accommodation Review	Comprehensive Performance Assessment – Data Quality Strategy; Complaints Review	Organisational Development Strategy – Human Resources
Staff and Member Training Modules	Information Governance Policy Roadshow (ongoing); CETIS (ongoing as strategic framework is being established); Employees Information Pack (ongoing as strategic framework is being established); Staff awareness modules in Information Rights and Records Management (Winter/Spring 2008/9); Information Governance Liaison	Information Governance Policy Roadshow (ongoing); CETIS (ongoing as strategic framework is being established); Employees Information Pack (ongoing as strategic framework is being established); Staff awareness modules in Information Rights and Records Management (Winter/Spring 2008/9); Information Governance Liaison	Information Governance Policy Roadshow (ongoing); CETIS (ongoing as strategic framework is being established); Employees Information Pack (ongoing as strategic framework is being established); Staff awareness modules in Information Rights and Records Management (Winter/Spring 2008/9); Information Governance Liaison Officer Training (Winter 2008)	Information Governance Policy Roadshow (ongoing); CETIS (ongoing as strategic framework is being established); Employees Information Pack (ongoing as strategic framework is being established); Staff awareness modules in Information Rights and Records Management (Winter/Spring 2008/9); Information Governance Liaison	Information Governance Policy Roadshow (ongoing); CETIS (ongoing as strategic framework is being established); Employees Information Pack (ongoing as strategic framework is being established); Staff awareness modules in Information Rights and Records Management (Winter/Spring 2008/9); Information Governance Liaison Officer Training (Winter 2008)	Information Governance Policy Roadshow (ongoing); CETIS (ongoing as strategic framework is being established); Employees Information Pack (ongoing as strategic framework is being established); Staff awareness modules in Information Rights and Records Management (Winter/Spring 2008/9); Information Governance Liaison Officer Training (Winter 2008)

	Officer Training (Winter 2008)	Officer Training (Winter 2008)		Officer Training (Winter 2008)		
Business as usual		Estates Management – developed a retention schedule; Dolphin Centre – providing records management advice; Cultural Services – developed a retention schedule for the Arts Centre and Civic Theatre which will then be cascaded to the rest of division; Business continuity plans – developing and providing information asset registers to accompany service area business continuity plans, focussing on Category 1* and 1 services first; Tourist Information Centre – provided a retention schedule to assist in the office relocation; and Houndgate Offices – provided a retention schedule for Public Protection and Cemeteries and Crematorium as part of	Estates Management – developed a retention schedule; Dolphin Centre – ensuring compliance with the Data Protection Act 1998; Cultural Services – developed a retention schedule for the Arts Centre and Civic Theatre which will then be cascaded to the rest of division; National Fraud Initiative – ensuring that all the data sharing and transfer procedures comply with the Data Protection Act 1998; CCTV – developed CCTV Management Guidance and organised a workshop; Personal Data Transfer Survey – to assess the security of transfers of personal data within the Council and with external partners; Information governance health check –developing a risk assessment methodology	Dolphin Centre – ensuring compliance with the Data Protection Act 1998; National Fraud Initiative – ensuring that all the data sharing and transfer procedures comply with the Data Protection Act 1998; Business continuity plans – developing and providing information asset registers to accompany service area business continuity plans, focussing on Category 1* and 1 services first; CCTV – developed CCTV Management Guidance and organised a workshop; Personal Data Transfer Survey – to assess the security of transfers of personal data within the Council and with external partners; Information governance health	Personal Data Transfer Survey – to assess the security of transfers of personal data within the Council and with external partners; Information governance health check – developing a risk assessment methodology that can be used across the Council.	Estates Management – developed a retention schedule; Dolphin Centre – ensuring compliance with the Data Protection Act 1998 and providing records management advice; Cultural Services – developed a retention schedule for the Arts Centre and Civic Theatre which will then be cascaded to the rest of division; National Fraud Initiative – ensuring that all the data sharing and transfer procedures comply with the Data Protection Act 1998; Business continuity plans – developing and providing information asset registers to accompany service area business continuity plans, focussing on Category 1* and 1 services first; CCTV – developed CCTV Management Guidance

		their preparation for the office relocation. Personal Data Transfer Survey – to assess the security of transfers of personal data within the Council and with external partners; Information governance health check –developing a risk assessment methodology that can be used across the Council.	that can be used across the Council.	check –developing a risk assessment methodology that can be used across the Council.		and organised a workshop

*   Target deadline dates have not been provided as some of the Centres of Excellence and all of the Leading Edge Projects have specific project plans governing them that do not fall within the control of the Information Governance Team.

NB: The dates provided are target deadlines or completion dates.

Appendix B: Request for information performance indicators (as published in The DIGGR – Darlington Information Governance Group Relay)

Information Rights Requests – statistical update: April – September 2008

Request type:

Legislation	
FOIA	160
EIRs	43
DPA	13
Cross-legislation	6
Total:	222

Freedom of Information Requests – statistical analysis: April – September 2008

Department providing the information:

FOI Requests	
Corporate Services	69
Children's Services	57
Assistant Chief Ex.'s	23
Community Services	44

NB: the variance in the total is down to cross-departmental requests.

Exemption applied:

FOI requests	
No exemption	147
Partial exemption	11
Full exemption	8

Location of requestor:

FOI requests	
Local requestors	23
National requestors	142
Unknown	1

Type of requestor:

FOI requests	
Individual	22
Media	41
Pressure	46
Companies	43
Charity	5
Employee	0
Local authority	8
Unknown	1

Time taken to respond:

20 working days or less	162
More than 20 working days	4