AUDIT COMMITTEE
26 June 2009

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 third 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 with evidence provided to the Audit Committee to reflect on the Council's information governance arrangements.

Paul Wildsmith
Director of Corporate Services

Background Papers

(a)   Corporate Information Governance Policy
(b)   Corporate Information Governance Group Work Programme
(c)   Corporate Information Governance Policy Implementation Progress Reports to Audit Committee in June and December 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.
Efficiency	There is no specific efficiency impact.

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 third 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. Progress to date is illustrated by the diagram in **Appendix A**;

    (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. The number of requests for support and guidance in all areas of information governance continues to grow.

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

(a) Strategic framework

    (i) Tasks completed:

        a) Data Protection Policy Guidance – Information Sharing Code of Practice and Toolkit and DOs and DON'Ts for CCTV and Safe Havens which have been published onto the Council's intranet, iDarlington and then promoted at all training sessions, team presentations and awareness raising exercises, in the DIGGR (bi-monthly newsletter to managers) and via the Flyer.

        b) Records and Information Management Policy Guidance – Data Handling Guidelines for all managers: are you doing enough to protect our data? based on the Local Government Association Local Government Data Handling Guidelines published in November 2009; Corporate Scanning Guidance; and DOs and DON'Ts for Email Management, Data Handling and Scanning. These have all been published onto the Council's intranet, iDarlington and then promoted at all training sessions, team presentations and awareness raising exercises, in the DIGGR and via the Flyer.

        c) Data Quality Policy Outputs – data quality assurance checklist used as part of the Information Governance Audit Tool (see below) and the creation of MADG (Multi-Agency Data Group) which is a dedicated group made up of representatives from the Darlington Partnership to ensure that data processed and shared within the partnership meets best practice.

        d) Revision of the Council's Data and Information Security Policy and Guidance – new security protocols and controls have been introduced as part of the Council's involvement with the Government Connects programme and best practice.

    (ii) Tasks in progress:

        a) Records and Information Management Policy Guidance –the service level agreement with Durham County Record Office is under review and once finalised, an Archives Policy will be circulated to managers with appropriate guidance.

        b) Information Governance Audit Tool– an audit tool is to be applied across selected data sets within departments by Audit Services as part of the 2009/10 Audit Plan following pilots in Legal Services and Local Taxation.

        c) Revision of the Council's Data and 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, including a security incident reporting procedure. This

policy will address compliance with national regulations covering secure data handling and management (Local Government Data Handling Guidelines) as well as compliance with the ISO code of practice on information security management (ISO 27002).

(b) Centres of Excellence – those established centres where work is still ongoing are supported by the Corporate Information Governance Team as requested, for example Council Tax and Housing Benefits.

(c) Leading Edge Projects – those projects that are still underway are supported by the Corporate Information Governance Team as requested, for example the Accommodation Review.

(d) Staff and member training modules

(i) Since the last update report the Corporate Information Governance Team has raised awareness via: 2 more editions of the DIGGR (Darlington Information Governance Relay) – a newsletter for managers; creation of a policy and guidance repository on the Corporate Information Governance intranet pages on i-Darlington promoted by an article in the Flyer (monthly and weekly bulletin); bespoke presentations to team meetings; and management briefings on specific topics such as, data handling and data security.

(ii) Workforce Development Directory (Council training directory of all internal courses for staff) – two new staff awareness sessions are now included and cover:

a) Information Rights (including data protection); and

b) Data, Records and Information Management.

(iii) Inclusion of all information governance related policies onto the online staff training system, CALMS;

(iv) Inclusion of all information governance related policies in the Employees Induction Information Pack.

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

(vi) IGLO (Information Governance Liaison Officer) refresher training session was held in February 2009 and will be followed up as changes occur in information rights legislation and best practice.

(vii) CCTV and Data Protection: a seminar was held to discuss the data protection risks of managing CCTV systems, in partnership with the Insurance and Risk Management Team, in March 2009.

(viii) Bespoke training sessions delivered on request on relevant information governance issue for teams, eg Lifeline Wardens, Housing Benefits and the Access and Contact Team in Adult Services.

(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 October 2008 and March 2009 is illustrated in the tables in **Appendix C**. The tables illustrate not only the record high number of requests the Council has received, in line with regional trends, but also which directorate receives the most requests and the most common requestor type.

(ii) Records and information management and governance advice, support and guidance has increasingly focused on data protection and data security, for example provided the fair processing notices for the Employees Health Questionnaire and ensuring that ContactPoint (the children's database) complies with the Council's policies on data protection and data quality.

(iii) Environmental Information Regulations Guidance – agreed appropriate standards for those sections processing environmental information in light of new regulations.

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:

Please see the spreadsheet attached. The framework uses a traffic light system to denote progress:

- Green = completed
- Amber = in progress
- Red = not started

Appendix B: 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 (Summer 2009)	Create an Archives Policy and Guidance (Summer 2009)	Creation and circulation of guidance on FOI and DPA (Jan – Mar 2009)	Review and revise the Council's Information Security Policy (Summer 2009); briefing paper on data security for managers (Jan 2009).	Data Quality Policy (Mar 2009); Data Quality Assurance Checklist (Feb 2009); Information Governance Audit Tool (Summer 2009).	This workstream has been put on hold pending the next Senior Manager's Network meeting and the Knowledge Management presentation.
Centres of Excellence *	Ongoing involvement, as appropriate	Ongoing involvement, as appropriate	Ongoing involvement, as appropriate	Ongoing involvement, as appropriate	Ongoing involvement, as appropriate	Ongoing involvement, as appropriate
Leading Edge Projects *	Ongoing involvement, as appropriate	Ongoing involvement, as appropriate	Ongoing involvement, as appropriate	Ongoing involvement, as appropriate	Ongoing involvement, as appropriate	Ongoing involvement, as appropriate
Staff and Member Training Modules	Information Governance Policy Roadshow (ongoing); CALMS (ongoing as strategic framework is being established); Employees Induction Information Pack (ongoing as strategic framework is being established); Staff awareness modules in Information Rights	Information Governance Policy Roadshow (ongoing); CALMS (ongoing as strategic framework is being established); Employees Induction Information Pack (ongoing as strategic framework is being established); Staff awareness modules in Information Rights	Information Governance Policy Roadshow (ongoing); CALMS (ongoing as strategic framework is being established); Employees Induction Information Pack (ongoing as strategic framework is being established); Staff awareness modules in Information Rights and Data, Records and	Information Governance Policy Roadshow (ongoing); CALMS (ongoing as strategic framework is being established); Employees Induction Information Pack (ongoing as strategic framework is being established); Staff awareness modules in Information Rights	Information Governance Policy Roadshow (ongoing); CALMS (ongoing as strategic framework is being established); Employees Induction Information Pack (ongoing as strategic framework is being established); Staff awareness modules in Information Rights and Data, Records and	Information Governance Policy Roadshow (ongoing); CALMS (ongoing as strategic framework is being established); Employees Induction Information Pack (ongoing as strategic framework is being established); Staff awareness modules in Information Rights and Data, Records and

	and Data, Records and Information Management (Apr – May 2009); Information Governance Liaison Officer Training (Feb 2009).	and Data, Records and Information Management (Apr – May 2009); Information Governance Liaison Officer Training (Feb 2009); CCTV and DP seminar (Mar 2009); bespoke sessions on data handling and data protection (Jan – Jun 2009)	Information Management (Apr – May 2009); Information Governance Liaison Officer Training (Feb 2009).	and Data, Records and Information Management (Apr – May 2009); Information Governance Liaison Officer Training (Feb 2009); bespoke sessions on data handling and data protection (Jan – Jun 2009); Government Connects new security controls (Apr – Jun 2009).	Information Management (Apr – May 2009); Information Governance Liaison Officer Training (Feb 2009).	Information Management (Apr – May 2009); Information Governance Liaison Officer Training (Feb 2009).
Business as usual	Bespoke training sessions (ongoing)	File plan and retention schedule for CareStore in Adult Services	Employees Health Questionnaire (Jan 2009), ContactPoint (Jan – Jun 2009), individual information sharing arrangements (ongoing), Fair Processing Notices (ongoing) and bespoke training sessions (ongoing), and a file plan and retention schedule for CareStore in Adult Services.	Bespoke training sessions (ongoing)	Bespoke training sessions (ongoing)	N/A

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

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

Information Rights Requests – statistical update: October 2008 – March 2009

Request type:

Legislation	
FOIA	204
EIRs	49
DPA	15
Cross-legislation	1
Total:	269

Freedom of Information Requests – statistical analysis: October 2008 – March 2009

Department providing the information:

FOI Requests	
Corporate Services	100
Children's Services	55
Assistant Chief Ex.'s	28
Community Services	64

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

Exemption applied:

FOI requests	
No exemption	178
Partial exemption	21
Full exemption	6

Location of requestor:

FOI requests	
Local requestors	42
National requestors	162
Unknown	1

Type of requestor:

FOI requests	
Individual	44
Media	59
Pressure	32
Companies	59
Charity	5
Employee	0
Local authority	3
Unknown	3

Time taken to respond:

20 working days or less	196
More than 20 working days	9