ITEM NO.   ....5.............

CORPORATE INFORMATION GOVERNANCE POLICY
IMPLEMENTATION PROGRESS REPORT

Purpose of Report

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

Background

2.   The term information governance covers a number of components:-

   (a)   managing information governance – creating a governance framework to oversee all aspects of information governance and management
   (b)   records management (including document management and archives) – the systematic management of all documents that are a record of a transaction or activity and the information or data they contain.
   (c)   compliance – adherence to legislation and mandatory standards that dictate how information is created, processed, managed, accessed, retained, archived and destroyed.
   (d)   information security – ensuring that information is stored in secure environments and only accessed by appropriate and approved individuals.
   (e)   data quality – ensuring that data is accurate, valid, reliable, precise, timely, relevant and complete.
   (f)   knowledge management – developing a working environment that ensures knowledge is created, shared, learned, enhanced and organised to retain the expertise and experience of staff and members for the benefit of the Council and its citizens.

3.   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 the following information management principles to underpin the Council's operations and service delivery:

Corporate asset	Information is a corporate **asset** and therefore requires a corporate approach to its management, as with any other asset.
Secure and confidential	Information must be managed in a **secure** fashion, preventing unauthorised access and ensuring confidentiality.
Accessible and open	Information must be readily **accessible** and **open** to those who need it for operational or business reasons and systematically shared within the organisation and with partners.
Accurate and up-to-date	Information must be **accurate** and **up-to-date**
Held once	Information must be captured **once**, as close to the source as possible, and shared/reused many times
Compliance	Information must be managed in **compliance** with legislation and operation requirements.
Managed	Information must be **managed** in line with the Records Management Society's retention, archiving and disposal schedule.
Relevant	Information must be **relevant** to help improve the efficiency of the services offered by the Council.

4. The Policy comprises 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.

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

Progress made on implementing the Policy

6.   The positive progress made to date is outlined below through each of the implementation methods and **Appendix A** to this report details key outputs across each of the Policy's six workstreams:

   (a)   Strategic framework
   - Data Quality Strategy (approved by Cabinet in June 2008, following discussions in Resources Scrutiny) – the Data Quality Strategy ensures the Council has good arrangements in place to produce reliable data in line with CPA requirements on data quality.
   - Revision of the Freedom of Information Policy (Jun 2008) – outlining the Council's procedures and standards for complying with the Freedom of Information Act 2000, such as processing requests for information. The former policy was approved in 2004 and updated in the light of experience and guidance from the Information Commissioner's Office.
   - Revision of the Data Protection Policy (Jun 2008) – outlining the Council's procedures and standards for complying with the Data Protection Act 1998, such as processing subject access requests and data sharing. Again, the former policy was approved in 2004 and has been updated in the light of experience and guidance from the Information Commissioner's Office, pending approval by the JCC.
   - Creation of an Environmental Information Regulations Policy (Jun 2008) – outlining the Council's procedures and standards for complying with the Environmental Information Regulations 2004, such as processing requests for information. This was necessary as the Council is receiving a growing number of requests processed under this legislation.
   - Creation of a Re-use of Public Sector Information Policy (Jun 2008) – 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.
   - Revision of the Records Management Policy (Jun 2008) – outlining the Council's procedures and standards for records management best practice and complying with the Freedom of Information Act 2000 Records Management Code of Practice, such as a corporate retention, archiving and destruction schedule. The former policy was approved in 2004 and updated in the light of experience and guidance from the Information Commissioner's Office.
   - Creation of an Archives Policy (Jun 2008) – outlining the Council procedures and standards for managing physical and digital archives.

   (b)   Centres of Excellence
   - Children's Services - Human Resources Personal Files: completed 1st stage (non-schools files): agreed and assisted in the implementation of 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.
   - 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 (Jun 2008) 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) (Jun 2008).

(c) Leading Edge Projects
- Administration Review – Typing: developed and assisted 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.
- Stockton-Darlington Partnership: provided pre-partnership data sharing guidance for staff in Transactional Human Resources; contributed to the Project Plan for Transactional Human Resources entering the partnership.
- Accommodation Review: input information governance requirements into the Project Plan, which now include a records and document management checklist for all office moves and will ensure compliance with information rights legislation.
- Complaints Review: input information governance requirements into the Project Plan and specification for the Corporate Complaints system.
- Comprehensive Performance Assessment – Corporate Data Quality Strategy: completed (see Strategic Framework outputs above). This will deliver data quality standards and staff training.

(d) Staff and member training modules
- 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 Human Resources Management Team, ICT Liaison Group, Corporate Risk Management Group, Adult Social Services DMT, and Community Services DMT; published a promotional article in the Flyer; and created an information governance newsletter, The DIGGR (Darlington Information Governance Relay).
- Member's Development Programme: Information Governance module created and delivered in September 2007 which will be reviewed and repeated in September 2008.

(e) Business as usual
- Processing information requests under the Freedom of Information Act 2000, Data Protection Act 1998 and Environmental Information Regulations 2004 – a breakdown of the requests we received between January and March 2008 are illustrated in the tables in **Appendix B**. The tables illustrate not only the high number of requests the Council receives (in line with regional trends) but also which directorate receives the most requests (Corporate Services) and the most common requestor (individual members of the public).
- Personal Data Transfer Survey (June 2008) – to assess the security of transfers of personal data within the Council and with external partners. Each directorate will receive a report with recommendations for improvement, as appropriate.
- Bespoke staff training on the information rights legislation and the Council's procedures for processing information requests for the Environmental Health and Estates Management Teams.
- Records management advice, support and guidance: CCTV – provision of ongoing advice with requests for CCTV data, to ensure that the Data Protection Act is complied with and input into the CCTV Code of Practice; Adult Protection – provided information governance input to staff training; Corporate Procurement – ensuring all standardised records are compliant with national information rights

legislation and Council policies; Web Team – providing records management input into their administrative and content management processes; Customer Services – ensuring that any data sharing and authentication procedures are compliant with national information rights legislation; and Legal Services – providing support to the daily work and annual inspection under RIPA (Regulation of Investigatory Powers Act 2000).

Conclusion

7.   To summarise, significant progress has been made in **all** areas of information governance across the Council in the last 12 months as a direct result of the Corporate Information Governance Policy. The Information Governance Team is targeting those services and business areas that require urgent assistance with their information as well as delivering a strategic framework for the whole Council and developing approaches to managing information requests.

Recommendation

8.   It is recommended that the report be noted.

Paul Wildsmith
Director of Corporate Services

Background papers
  (i)   Corporate Information Governance Policy
  (ii) Corporate Information Governance Group Work Programme

Ciara Shimidzu: Extension 2931
TAB

Corporate Information Governance Policy Workstreams and Implementation Matrix

	Information Governance Policy Workstreams					
Information Governance Policy Implementation methods	**Managing Information Governance**	**Records Management**	**Compliance**	**Information Security**	**Data Quality**	**Knowledge Management**
Strategic Framework	Complete Corporate Information Governance Policy (Jan 2008); create the Corporate Information Governance Group (Jan 2008)	Revise the Records Management Policy (Jun 2008); create an Archives Policy (Jun 2008) ; email staff tips for records management good practice (Sep 2008)	Revise the Freedom of Information and Data Protection Policies (Jun 2008); create the Environmental Information Regulations and Re-use of Public Sector Information Policies (June 2008); revise and update the Council's Publication Scheme (Jun 2008); create a data sharing code of practice (Sep 2008); create a data sharing staff toolkit (Nov 2008); email staff tips for maintaining compliance (Sep 2008)	Review and revise the Council's Information Security Policy (Nov 2008); email staff tips for keeping information secure (Dec 2008)	Create a Corporate Data Quality Strategy (Mar 2008); create a corporate Data Quality Policy (Aug 2008); create Data Quality standards and rules (Jul 2008); create Corporate Data Quality Code of Practice (Oct 2008); start Data Quality training programme (Aug 2008); start Data Quality roadshow (Jan 2009); email Data Quality tips to staff (Jan 2009); add Data Quality modules to Partnership Toolkit (Jan 2009)	Management workshop on knowledge management in Darlington Borough Council (May 2008); Knowledge Management presentation to SMN (Sep 2008); revise Knowledge Management Policy (Oct 2008)
Centres of Excellence *		Children's Services H.R. Personal Files (Spring 2008 – 1st stage); Adult and Children's Services Case File Management Review – Doc Control	Consultation Database (Winter 2007); Children's Services H.R. Personal Files (Spring 2008 – 1st stage); Adult and Children's Services	Consultation Database (Winter 2007); Children's Services H.R. Personal Files (Spring 2008 – 1st stage); Adult and Children's Services	Consultation Database (Winter 2007); Council Tax and Housing Benefit Alignment (Spring 2009)	Consultation Database (Winter 2007)

Information Governance Policy Implementation methods	Information Governance Policy Workstreams					
	Managing Information Governance	Records Management	Compliance	Information Security	Data Quality	Knowledge Management
		and CareStore (Spring 2008); Document Management Strategy (Winter 2008)	Case File Management Review – Doc Control and CareStore (Spring 2008); Document Management Strategy (Winter 2008)	Case File Management Review – Doc Control and CareStore (Spring 2008)		
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 (Spring) 2008); CETIS (Summer 2008); Employees Information Pack (Summer 2008); Staff awareness modules in Information Rights and Records Management (Autumn 2008); Member's Development Programme (Winter	Information Governance Policy Roadshow (Spring) 2008); CETIS (Summer 2008); Employees Information Pack (Summer 2008); Staff awareness modules in Information Rights and Records Management (Autumn 2008); Member's Development Programme (Winter	Information Governance Policy Roadshow (Spring) 2008); CETIS (Summer 2008); Employees Information Pack (Summer 2008); Staff awareness modules in Information Rights and Records Management (Autumn 2008); Member's Development Programme (Winter 2007); Information Governance module for	Information Governance Policy Roadshow (Spring) 2008); CETIS (Summer 2008); Employees Information Pack (Summer 2008); Staff awareness modules in Information Rights and Records Management (Autumn 2008); Member's Development Programme (Winter	Information Governance Policy Roadshow (Spring) 2008); CETIS (Summer 2008); Employees Information Pack (Summer 2008); Staff awareness modules in Information Rights and Records Management (Autumn 2008); Member's Development Programme (Winter 2007); Information Governance module for	Information Governance Policy Roadshow (Spring) 2008); CETIS (Summer 2008); Employees Information Pack (Summer 2008); Staff awareness modules in Information Rights and Records Management (Autumn 2008); Member's Development Programme (Winter 2007); Information Governance module for

Information Governance Policy Implementation methods	Information Governance Policy Workstreams					
	Managing Information Governance	Records Management	Compliance	Information Security	Data Quality	Knowledge Management
	2007); Information Governance module for Management Development Programme (Winter 2009); Information Governance Liaison Officer Training (Summer 2008)	2007); Information Governance module for Management Development Programme (Winter 2009); Information Governance Liaison Officer Training (Summer 2008)	Management Development Programme (Winter 2009); Information Governance Liaison Officer Training (Summer 2008)	2007); Information Governance module for Management Development Programme (Winter 2009); Information Governance Liaison Officer Training (Summer 2008)	Management Development Programme (Winter 2009); Information Governance Liaison Officer Training (Summer 2008)	Management Development Programme (Winter 2009); Information Governance Liaison Officer Training (Summer 2008)
Business as usual		Environmental Health – revised internal procedures for processing information requests and managing records; Town Hall basement clearance – provided guidance on the retention and destruction of documents; Corporate Risk Management and Insurance – created information governance sections to the Partnership	Environmental Health – revised internal procedures for processing information requests and managing records; Town Hall basement clearance – provided guidance on the retention and destruction of documents; Corporate Risk Management and Insurance – created information governance sections to the Partnership Toolkit; CCTV –	CCTV – provide ongoing advice with requests for CCTV data, ensure that the Data Protection Act is complied with and input into the CCTV Code of Practice;	E-learning platform (schools) – ensuring that schools systems are compliant with national information rights legislation and Council policies (in partnership with Children's Services); Web Team – providing records management input into their administrative and content management processes;	E-learning platform (schools) – ensuring that schools systems are compliant with national information rights legislation and Council policies (in partnership with Children's Services);

Information Governance Policy Implementation methods	Information Governance Policy Workstreams					
	Managing Information Governance	Records Management	Compliance	Information Security	Data Quality	Knowledge Management
		Toolkit; Housing Admin – provided a retention and destruction schedule for their records and documents; ICT - Public Folders (Outlook) – reviewing current practice of using Public Folders and drafting a policy ensuring a more joined up and efficient management of email records; E-learning platform (schools) – ensuring that schools systems are compliant with national information rights legislation and Council policies (in partnership with Children's Services);	provide ongoing advice with requests for CCTV data, ensure that the Data Protection Act is complied with and input into the CCTV Code of Practice; Housing Admin – provided a retention and destruction schedule for their records and documents; Adult Protection – provided information governance input to staff training; E-learning platform (schools) – ensuring that schools systems are compliant with national information rights legislation and Council policies (in partnership with			

Information Governance Policy Workstreams						
Information Governance Policy Implementation methods	**Managing Information Governance**	**Records Management**	**Compliance**	**Information Security**	**Data Quality**	**Knowledge Management**
		Business Development – providing support for their records management and assisting with the fair processing notices; Corporate Procurement – ensuring all standardised records are compliant with national information rights legislation and Council policies; Web Team – providing records management input into their administrative and content management processes;	Children's Services); Business Development – providing support for their records management and assisting with the fair processing notices; Corporate Procurement – ensuring all standardised records are compliant with national information rights legislation and Council policies; Web Team – providing records management input into their administrative and content management processes; Customer Services – ensuring that any data sharing and authentication procedures are			

	Information Governance Policy Workstreams					
Information Governance Policy Implementation methods	**Managing Information Governance**	**Records Management**	**Compliance**	**Information Security**	**Data Quality**	**Knowledge Management**
			compliant with national information rights legislation; Legal Services – providing support to the daily work and annual inspection under RIPA (Regulation of Investigatory Powers Act 2000)			

*   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.

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

Information Rights Requests – statistical update: January – March 2008

Relevant Legislation	
FOIA	94
EIRs	25
DPA	6
Cross-legislation	3
Total:	128

Freedom of Information Requests – statistical analysis: January – March 2008

Department providing the information:	
Corporate Services	50
Children's Services	33
Assistant Chief Ex.'s	18
Community Services	13

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

Exemption applied:	
No exemption	88
Partial exemption	6
Full exemption	3

Location of requestor:	
Local requestors	29
National requestors	67
Unknown	1

Type of requestor:	
Individual	30
Media	23
Pressure	16
Companies	23
Charity	1
Employee	0
Local authority	2
Unknown	2

Time taken to respond:	
20 working days or less	93
More than 20 working days	4