



# Midlothian Council Information Management Strategy

2013

<b>Version</b>	<b>Date</b>	<b>Changes</b>	<b>Amended by</b>
draft	01 Aug 12	First draft of document created	NM
2 <sup>nd</sup> draft	03/01/2013	Second draft	NM, RF & MI
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## 1. Executive Summary

The key to successful information management is to recognise the true value to the organisation of its information assets and take ownership of those assets. It is often said that money and staff are the two key assets of any organisation. To this mix we must also add information. Information is the life blood of the organisation. Without an accurate picture of the internal or external operating environments managers cannot effectively allocate money or staff to improve service delivery.

Information management is not about technology, it's about management! This strategy will look to move information management out of the environment of the technologist and into that of management. To subject information assets to rigorous checking by information Asset owners (IAO's) and to ensure information assets are fit for purpose by applying information management techniques to extract maximum value for Midlothian Council management, staff and service users.

## 2. Purpose of this Document

This document outlines the issues surrounding the effective sharing of high quality data. The strategy will raise a series of objectives and solutions for information management. The document will then provide a road map which considers the legal and business environments the Council will be operating in and the consideration that will impact on the business.

## 3. Introduction

An Information Management strategy is an organisation's plan that recognises the current situation vis à vis data protection, records management and information sharing. It provides a road map to ensure maximum value is extracted from our information assets; whilst maintaining sound governance.

Midlothian Council has a responsibility to provide excellent services to the public and value for money to the taxpayer. If Information is the life blood of an organisation then the effective management of that information across the Council is paramount.

There is an ongoing impetus for information to be managed effectively and efficiently for everyone. Current management of electronic records has traditionally been based on a divisional structure. This structure severely limits corporate knowledge by restricting visibility of many important information resources. The Council's Business Classification Scheme, created in line with the authority's obligations under the Public Records (Scotland) Act 2011, cuts across divisional structures to link information to the Council's functions and activities. This will provide the means to release the full value of our data in all formats.

### 3.1 Our Vision

*To manage our customers information from collection to disposal as effectively and efficiently as possible whilst maintaining and respecting our customers privacy.*

### 3.2 Scope of our Information Management Strategy

This strategy document sets out the 6 key areas that will have maximum impact on the Council's ability to manage its information and comply with increased legislative requirements.

Information Management Strategy scope will include:

1. Training and Awareness
2. Compliance and risk management
3. Records Management
4. Data management & Information Sharing
5. Performance reporting

The Information Management Group (IMG), through its annual action plans is the preferred vehicle for the delivery of this strategy. The IMG will of course require the full cooperation of senior management in allowing IMG members the time and resources to carry out this function.

### 3.3 Alignment with our Council Strategy

The Information Management Strategy aligns with our Corporate Strategy through the following objectives:

- Putting our customers first
- Ensure equality of opportunity as a service provider
- Support the council in its corporate improvements agenda, ensuring Best Value
- Promote social and financial inclusion in Midlothian
- Provide quality information that supports efficient and effective delivery of services to meet the full range of our customer needs.

### 3.4 Benefits for all stakeholders

Making changes to the way we manage our information assets will have benefits for our stakeholders, internally and externally. These benefits can include:

- **Improved data quality** – Garbage in, garbage out. It's an old computer adage but still true. Inaccurate data is not only useless can be dangerous. Improved data quality reduces waste and costs by ensuring we get things right first time.
- **Improved contact and reduced bureaucracy 'tell us once'** – customers will experience a better quality and faster service as our services focus on 'getting it right first time' at the first point of contact. For example members of the public don't have to continually prove their ID.
- **Reduced waste** – Over time council IT storage has grown considerably. Unfortunately because of poor file management, multiple copies of the same data can be found across several divisional servers.

This duplication of information assets is expensive to maintain. Greater control is needed to reduce this waste and duplication. The appointing of records management champions and the development of published file plans as part of the Public Records (Scotland) act will provide a consistent road map enabling staff to find the information they need.

- **Greater confidence** – Our customers will only share personal information with an organisation that can be trusted to maintain their privacy. The use of Privacy Impact Assessments and a dedicated suite of information sharing documentation will improve sharing whilst reducing risk.

### 3.5 Key Considerations

Each business area must take ownership of its information assets;

- All staff must understand their role in information management and accept responsibility for the accuracy and completeness of information they use;
- IMG members must be given the resources to complete the IMG Action plan and fulfil their commitments to support the group across the council;

- Completion of and updating of the Information Register is key to the success of this information management strategy. The register helps identify the type of information and the reasons behind our use of that asset. It will enable users to;
  - Map the flow of personal information across the Council
  - Identify responsibility for information assets
  - Highlight areas of risk, especially where sensitive personal information is processed

## 4. Information Management Strategy

### General Objectives

To provide a road map through a series of important milestones that will transform the management of information across all spheres of Council operation. Milestones that will create a culture where an individual's data is processed in a secure environment that respects the individual right to privacy whilst maximising benefits for both Council and the individual.

To create best practice where information management is fully embedded in the organisational structure and is subject to a rigorous regime of continual improvement.

The strategy will help ensure Midlothian Council not only complies with all privacy related legislation, but is seen by external bodies as a place of excellence for information management.

### 4.1 Training and Awareness

#### Key Objectives

To change the culture within the organisation to one which understands the true value of structured information management by;

- Developing a network of skilled information management representatives, whose role is to support all Council business areas in day to day information management issues.
- Providing a multi stage training programme for all staff that process personal information.
- Extending IM training to include external information sharing partnerships
- Fully utilising e-learning and Metacompliance software to continually remind and test staff knowledge and awareness of IM policies and procedures

#### Why do we need a strategy for training and awareness?

Awareness of the existence of data protection act throughout the Council is high. However, the impact the act has on day to day Council operations is not as ingrained as one might expect. Staff adherence to good practice is hampered by a lack of knowledge and training around information management. A three tier programme should be developed looking at the practical implementation of all information management legislation<sup>1</sup> and its impact on the organisation.

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<sup>1</sup> Data protection Act, Freedom of information (Scotland) Act, Public Records (Scotland) Bill, Human Rights Act and RIP(S)A.

## 4.2 Information sharing process

### Key Objectives

To have a comprehensive suite of documentation and process procedures for sharing customers' personal information. Clear process procedures which are safe secure and trusted by all customers and business partnerships. These can be based on the Scottish Accord on the Sharing of Personal Information (SASPI).

Provide regular audits of external suppliers and providers to ensure the recipients of personal data are also fulfilling their obligations under the Data Protection Act as data processors.

The development of a set of process procedures that provide a consistent methodology of exactly what must be done to comply with the Act. These procedures will highlight step by step, how I as a Council employee, can securely transfer information which will;

- Be compliant with the data protection act;
- Meet all other legal obligations around privacy and;
- Reduce the risk to the Council

As data controllers, our obligations under the data protection act do not end when information leaves the confines of the Council. For example if we share information with a third party we are still responsible for the security of the information as data controllers. Should that information be mis-used; it is Midlothian Council who will be penalised by the Information Commissioners Office.

## 4.3 Governance and Risk Management

### Key Objectives

Create and maintain a comprehensive information register of all information sharing agreements and subject these assets to regular independent audit.

Develop a suite of policies and process procedures that cover all aspects of information management,

Carryout privacy impact assessments at project initiation stage to identify information handling\ sharing risks to projects.

Keep Council staff updated with regards to future legislative changes and link this to training sessions.

### Why manage risk?

Breaches of data protection in local government have increased by 1609% over the past 5 years according to the information commissioner's office (ICO). In April 2010, the ICO gained the power fine an organisation up to £500,000 for data breaches. Proposed changes to the European Directive 95/46 EU (European Data Protection Act) could see fines rise to 1 or 2 % of a business's turnover or revenue.

It's not just about the data protection act. Information management covers the following legislation;

- Freedom of information (Scotland) Act
- Human Rights Act

- Regulation of Investigatory powers (Scotland) Act
- Environmental Information Regulations
- Privacy & Electronic Communications Regulations

All of these pieces of legislation interact. All obviously have to be adhered to and compliance is becoming increasingly the realm of the information management specialist.

We can greatly reduce the information management risks to projects through the use of privacy impact assessments (PIA). A PIA will identify data protection risks early on in the project management life cycle those reducing the likelihood of project delays due to unrecognised data protection issues.

## 4.4 Records Management

### Key Objectives

Provide improved management of all Midlothian information assets by creating and implementing a framework in line with the Public Records (Scotland) Act 2011.

Remove divisional information silos by creating a classification scheme and file plan based not on perceived ownership but information and business function.

Improve electronic folder and file creation so as to improve staff corporate knowledge management and reduce duplication.

Fully utilise the Records Centre as a data repository and not just a storage facility.

Establish clear lines of responsibility for record-keeping at departmental, service and directorate levels.

Maintain and improve provisions for business continuity and disaster management with regard to records and information.

The improvement of records management requires cultural changes across the Council, including the establishment of clear lines of responsibility for record-keeping which are accountable to senior management. This will ensure that good records management practice is reinforced consistently throughout the Council and appropriate procedures are applied to all information assets, whether paper or electronic.

Improvement also requires procedural changes, which are laid out in the Council's Records Management Plan. Information assets are often to be found inside divisional silos, without the consistent use of agreed filing structures and procedures. This effectively inhibits access to information assets, making valuable information invisible. To quote a member of staff working on an economic development report, 'we can't join the dots because we can't even see them.' To better manage our information assets and extract maximum value from them, information needs to be linked to the Council's functions and activities, not ownership, and consistent file naming and creation procedures need to be applied.

In order to ensure business continuity long-term and in the event of disaster, staff need to be sure of having continued access to their business-critical information. Vital records and information need to be identified and provided for by business continuity and emergency procedures across the Council.

## 4.5 Data Management

### Key Objectives

Subject business critical systems to a comprehensive series of specifically designed validation tests to ensure accuracy, relevance and completeness.

Assign ownership and responsibility for all business critical information assets to named staff or information assurance officers.

Embrace Open and Big data initiatives and make large data sets available to higher education and industry.

We need our information assets to as accurate and complete as possible. This accuracy can only be achieved if clear ownership of key assets is assigned to responsible individual staff members. Systems like Frameworki must be cross referenced and citizen and address data continually managed to prevent error. We propose each critical information set be subjected to rule based testing of whole data sets rather than random sampling.

The Council collects a wide range of data which can be easily made available to high education institutions and business.

## 4.6 Data Sharing

### Key Objectives

Develop a sound regime around all information sharing both internally and externally.

Nurture good relationships with data processors and recipients of Council information based on ICO best practice.

Respond to all third party requests for data (FOI, EIR & SAR) within the statutory timescales.

Data sharing presents the greatest risk of governance failure to the Council. It is vital that all data sharing is conducted in line with best practice as highlighted in the ICO guide “Data sharing code of practice”.

As a Data Controller it is the Council that will face sanction if our Data processors and or Recipients lose our information. Fostering a good working relation with all data recipients is vital in ensure all third parties have appropriate technical and organisational measures in place to reduce the risk of a data breach.

Information rights are higher than ever on the public agenda. That’s because more and more transactions are done online – by us or about us. Shopping, entertainment, banking, communicating, socialising – but also tax, pensions, benefits, health records, council services and so on. That’s not going to go away – in fact, it’s only going to grow. Therefore it is important the Council recognises and fully embraces the public “right to know”.

## 4.7 Performance reporting

### Key Objectives

To develop meaningful metrics that reflects the true quality of the organisations information assets.

Publish clear data quality standards for key information assets and make these available via the internet for public scrutiny.

Data breach reports created by the IMG Data Breach Team should be presented to both CMT and elected members on a regular basis.

To aid continuous improvement we need trusted metrics by which we can reliably measure progress. A small scale pilot has been looking at the data matching between the Council Address

Gazetteer and other systems using address components<sup>2</sup>. This pilot should be improved and expanded to monitor progress of this strategy. By looking at address matching and other quality indicators – such as record completeness we can monitor, report and improve the quality of our data assets.

## **5. Structures and Working Arrangements**

This Information Management Strategy sets out Midlothian Council's high level objectives and priorities with regards to delivering its services through improved management of information. The Information Management Group will be the vehicle for delivering this strategy.

Annual action plans will be created by the IMG to ensure that once approved, this strategy is implemented. This strategy will also be subjected to annual review to ensure a 'best fit' with business transformation and other Council strategies.

Full support of senior management is critical to delivery of specific actions/deliverables from the key objectives in this Strategy. Line managers should add Information management to their Service Review Plans and provide IMG members the support necessary to complete the IMG action plan.

All staff must recognise their responsibilities with regards to information management and take ownership of their information assets. Staff will be supported by information management group representatives. To this affect information management is now part of the competency framework and should be added to staff training assessments.

## **6. Timescales**

Implementation of this strategy will be executed through the Information Management Group. A series of annual action plans will be created to fulfil the objectives set out in this strategy document.

The first of these actions plans is scheduled for 2013\14 and is already in place. Compliance with the actions in the 2013\ 14 plan will be monitored via Covalent and progress reported to CMT by the Council SIRO.

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<sup>2</sup> <http://intranet/services/infoman/perfman/dataquality.asp>