ABSTRACT

This Report proposes a policy for adoption by the Council for Information Governance and suggests the setting up of a group to lead Information Governance within Angus.

1. RECOMMENDATIONS

1.1 It is recommended that the Committee:-

(i) approve the Information Governance Policy attached as Appendix I;

(ii) approve the remit of the Information Governance Group attached as Appendix II; and

(iii) develop Information Governance within Angus Council in line with the action plan attached as Appendix III.

2. BACKGROUND

2.1 In 2010 an Internal Audit was undertaken of the Council’s Information Governance Management arrangements. The Council was measured against the Information Governance Toolkit established by the UK Government in 2006. The Information Governance Toolkit is divided into five sections, namely:-

1. Information Governance Management
2. Information Security
3. Compliance
4. Information Quality Assurance
5. Records Management

2.2 The purpose of the toolkit is to ensure that the public sector as a whole have an overarching Information Governance framework which supports the objectives of Information Governance which are to ensure that data is: (1) held securely and confidentially; (2) obtained fairly and lawfully; (3) recorded accurately and reliably; (4) used effectively and ethically; (5) shared appropriately and legally and that the public sector discharge its legal responsibilities in relation to the data it holds.

2.3 Information represents one of the major assets held by the Council. The Council needs that information to provide its services to the citizens of Angus and to properly interact with third parties in the course of delivering those services.

2.4 The Council must manage the information it holds securely, efficiently and effectively. To achieve these objectives there needs to be in place appropriate policies, procedures and clearly defined responsibilities.

2.5 Adopting an Information Governance Policy would help to ensure these objectives and minimise the risk to the Council associated with breaches of legislation e.g. data loss or inappropriate data gathering.
3. PROPOSAL

3.1 This Report represents a first step towards achieving compliance with the Government’s Information Governance Toolkit.

3.2 The Council already has in place a Records Management Policy adopted in 2004 (Report No 1464/04) and a Retention Policy adopted in 2007 (Report No 1203/07). The records management group have reviewed the work needed to achieve compliance with the records management policy and have developed an action plan to progress that work. These policies constitute one section of the Information Governance Toolkit. The purpose of this Report is to present a policy for adoption by the Council on Information Governance, to set up a group which would be responsible for taking forward and developing the Council’s approach to Information Governance and an action plan for the period June 2011 to March 2012 which will ensure that progress is made in developing robust systems and procedures.

3.3 The remaining three areas of the toolkit, namely: Information Security, Compliance and Information Quality Assurance will be considered further when the governance and records management action plans have been completed.

4. FINANCIAL IMPLICATIONS

4.1 There are no financial implications in relation to the particular detail of this Report. However it must be accepted that in order to introduce a robust and appropriate Information Governance process, members of the Information Governance Group will require to dedicate time to the development of guidance, processes and procedures and whilst no exact estimate can be given of the amount of time which such a process will take, it should be recognised that substantial staff time is required to develop the task ahead of the Council achieving full compliance with the Information Governance Toolkit.

5. HUMAN RIGHTS IMPLICATIONS

5.1 By adopting the policy in relation to Information Governance, the Council will minimise any risk of a breach of Human Rights by restricting the improper use of data relating to individuals.

6. EQUALITIES IMPLICATIONS

6.1 The issues dealt with in this Report have been the subject of consideration from an equalities perspective. An equalities impact assessment is not required.

7. CONSULTATION

7.1 The Chief Executive, all Directors, the Head of Law and Administration and the Head of Finance have been consulted in the preparation of this report.

8. CONCLUSION

8.1 The Council is recommended to adopt the Information Governance Policy, approve the setting up of an Information Governance Group in terms of the remit attached as Appendix II and to agree the Information Governance Action Plan attached as Appendix III to progress the Council’s development of its Information Governance management systems and to ensure compliance with appropriate legislation.

COLIN McMAHON
DIRECTOR OF CORPORATE SERVICES

NOTE: No background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973 (other than any containing confidential or exempt information) were relied on to a material extent in preparing the above report.

CS/L&A/SCH
ANGUS COUNCIL
INFORMATION GOVERNANCE POLICY

1. INTRODUCTION

1.1 Information governance is a framework with which the Council will manage its information products and processes, to ensure compliance with the law and good practice and to promote operational efficiency.

1.2 The information held by the Council represents a valuable asset, which should be managed with the same care and attention that are applied to the traditional resources of money, property and personnel.

1.3 This policy formalises Angus Council’s governance approach to the management of information.

2. BACKGROUND

2.1 Historically, information management has been addressed in a fragmented manner and at sectional level. With the expansion of the amount of information generated within bodies such as the Council and the increasing expectation/obligations to manage that information in a secure, structured and effective manner, good practice dictates that a corporate approach is now adopted to create guidance and policies, monitor effectiveness of systems and ensure consistency of delivery in information management.

2.2 Improved information management can lead to significant benefits to the organisation especially by creating more effective ways of working, eg:

- saving time in the administration of information
- avoiding duplication and hence saving resources
- complying with the legal and ethical obligations placed on the council when holding information

2.3 This will result in, amongst other benefits:

- improved decision making by having high quality, comprehensive and accessible information
- enhancing the ability to share information both internally and externally
- supporting remote and mobile working and the provision of comprehensive mobile services and
- improved customer satisfaction.

3. SCOPE

3.1 This policy is applicable to all information, either written or electronic, held by Angus Council. This includes information that is:

- stored in computers
- stored on microfiche
- stored on tapes and disks
- transmitted across networks
- written/printed on paper, white boards, etc
- sent by fax
- presented on slides

3.2 This policy applies to all employees and elected members of Angus Council and to any contractor or agent performing work for, or on behalf of, the Council.
4. **PRINCIPLES**

The objectives of the Information Governance Policy are to ensure that the Council achieves:

- openness
- legal compliance
- information security
- information quality assurance

5. **POLICY**

The Council’s Information Governance Policy, which covers five key areas, is as follows:

5.1 **Information Governance Management**

The Council will put in place an effective Information Governance Action Plan. This will be implemented on behalf of the Chief Officers Management Team (COMT) by an Information Governance Group (IGG), to be established in accordance with the terms of reference attached and approved by the COMT. The IGG will be responsible for co-ordinating, publicising and monitoring the Council’s Information Governance Policy and implementing the associated Action Plan. The Action Plan will include:

- a rolling review of Council policies in the five key areas to ensure the creation of a suitable management process;
- promoting staff awareness, induction and update training to raise and maintain awareness of information governance across the Council;
- access to in-house advice by creating departmental champions; and
- provision for clearly defined lines of responsibility.

5.2 **Information Security**

The Council has adopted an electronic Information Security Policy which will be reviewed and expanded to include security for all records covered within the areas detailed in the paragraph headed “Scope” above.

The expanded Information Security Policy will be assessed to ensure effectiveness across the council at operational level.

5.3 **Compliance**

The Council will maintain and develop its existing Access to Information Policy. Procedures are currently in place to avoid breaches of the law, statutory and regulatory or contractual obligations. Two key elements of the Access to Information Policy are the Data Protection guidance already available on the Councils’ web pages and its guidance on Freedom of Information, also on the web.

Written procedures will be reviewed and staff training will be re-assessed and re-introduced to ensure the compliance aspect of information governance is implemented across the Council.

5.4 **Information Quality Assurance**

5.4.1 The Council will establish appropriate procedures governing the capture and recording of information and to ensure that, when new services are provided, or existing systems changed, these do not impact adversely on information quality.
5.4.2 These procedures will include the maintenance of consistency between different data systems, including metadata, and will be reviewed regularly for relevance and implementation. They will also include provisions for

- staff training
- auditing and quality checking
- clearly defined lines of responsibility.

5.5 Records Management

The Council has implemented a Records Management Policy, this will be reviewed and the retention guidelines will be expanded to cover more areas of the Council’s business. The Council will take steps to implement the Section 61 Code on Records Management prepared by the Scottish Government. The review of the records management policy will include provision for:-

- awareness, induction and update training of staff and relevant third parties
- storage, including storage accommodation
- retention, disposal and destruction

6. REVIEW

This policy will be reviewed as necessary by the Information Governance Group to ensure compliance with legislation and the fulfilment of Council requirements.

Sheona C Hunter
Head of Law and Administration
March 2011
APPENDIX II

Information Governance Group
Terms of Reference

1. CONSTITUTION

The Information Governance Group has been established to support and drive information governance and provide the COMT with assurance that the five information governance objectives are being implemented, namely:-

(a) Information is held securely and confidentially;
(b) Information is obtained fairly and lawfully;
(c) Information is recorded accurately and reliably;
(d) Information is used effectively and ethically;
(e) Information is shared appropriately and legally; and
(f) and that departments comply with the framework.

2. MEMBERSHIP

- Head of Law & Administration
- Head of IT
- Chief Internal Auditor
- Information Governance Champions (one from each department)

3. REMIT

(a) To ensure that an appropriate comprehensive information governance framework is in place throughout Angus Council in line with national standards.
(b) To develop the Information Governance policy and associated IG action plan.
(c) To monitor the Councils’ information handling activities to ensure compliance with law and guidance.
(d) To inform and raise awareness to the staff, members and partners of the Council of the Councils’ arrangements for Information Governance.
(e) To offer support, advice and guidance to the departments of the Council.
(f) To provide a focal point for the resolution and/or discussion of Information Governance issues.
(g) To determine information ownership and authorise or deny capture, processing and retention of information asset.
(h) To provide regular updates on progress to the COMT
Managing Information Governance – action plan

**MIG1  Information Governance Policy and Strategy**

<table>
<thead>
<tr>
<th>Ref</th>
<th>Outcome/aims</th>
<th>Existing compliance</th>
<th>Actions</th>
<th>Responsibility</th>
<th>Date</th>
<th>Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>The organisation has an information governance policy which has been implemented across the organisation.</td>
<td>&quot;The Council has no formal policy or strategy for information governance although elements that would support a policy are in place including a formal Data Protection Policy, procedures to facilitate data access requests and guidance in respect of access to information.&quot;</td>
<td>Draft policy to be approved, adopted and published.</td>
<td>Head of Law &amp; Admin</td>
<td>14.6.11</td>
<td>COMT 6 June 2011 Minute; Strategic Policy Committee 14 June 2011 Minute</td>
</tr>
<tr>
<td>1.2</td>
<td>There is understanding and awareness across the organisation of the policy.</td>
<td>&quot;Lack of formal policy precludes&quot;</td>
<td>Policy to be publicised to all relevant staff through the Council Intranet, Angus Mini Matters, cascade briefings and the Information Governance Champions (IG Champions).</td>
<td>IG Champions</td>
<td>31.3.12</td>
<td>Departmental Management Team Minutes</td>
</tr>
<tr>
<td>1.3</td>
<td>Staff have been trained to meet the necessary requirements.</td>
<td>&quot;Lack of formal policy precludes&quot;</td>
<td>IG Champions will ensure that staff training procedures within their relevant departments covers information governance.</td>
<td>IG Champions</td>
<td>31.3.12</td>
<td>Departmental Management Team Minutes</td>
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**MIG2  Improvement Plan**

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<th>Ref</th>
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<th>Actions</th>
<th>Responsibility</th>
<th>Date</th>
<th>Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1</td>
<td>The organisation has an action plan based on the information governance policy.</td>
<td>&quot;Lack of formal policy precludes&quot;</td>
<td>IG Action Plan to be drafted and approved by COMT.</td>
<td>Head of Law &amp; Admin</td>
<td>14.6.11</td>
<td>COMT 6 June 2011 Minute; Strategic Policy Committee 14 June 2011 Minute</td>
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</table>
### MIG3 Senior Management Support

<table>
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<th>Ref</th>
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<th>Actions</th>
<th>Responsibility</th>
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<th>Evidence</th>
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</table>
| 3.1 | The COMT has been briefed on information governance and actively and effectively supports the IG work programme. | “The COMT have not been formally briefed on information governance although there is an awareness of elements of information governance supported by the fact that a data loss risk was included in the corporate risk register for 2009-10 and procedures are being developed to improve data transfer arrangements.” | • Formal briefing of COMT, in the context of the adoption of the IG policy and formation of IG Group  
• Release of staff to become IG Champions  
• Updates on progress | Head of Law & Admin | 6.6.11 | COMT Minute |

### MIG4 Information Governance Group

<table>
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<tr>
<th>Ref</th>
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<th>Actions</th>
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<th>Date</th>
<th>Evidence</th>
</tr>
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<tbody>
<tr>
<td>4.1</td>
<td>There is an Information Governance Group (IG Group) which is responsible for co-ordinating, publicising and monitoring the information governance policy and strategy.</td>
<td>“There is no group or clear over-arching information governance function”</td>
<td>Establish IG Group.</td>
<td>COMT</td>
<td>6.6.11</td>
<td>COMT Minute</td>
</tr>
</tbody>
</table>
| 4.2 | The IG Group is supported by terms of reference agreed by the COMT. | IG Group terms of reference to be  
• approved by COMT  
• adopted by IG Group | COMT | 6.6.11 | COMT Minute |
| 4.3 | The IG Group is responsible for rolling out the remaining aspects of the policy, namely:-  
1. Information Security  
2. Compliance  
3. Information Quality Assurance and Records Management | Only Managing Information Governance has been considered to date and the further four aspects of the policy will be implemented after adoption of actions 1.1, 2.1, 3.1, 4.1 and 5.1 of this action plan | IG Group to consider the three further aspects of the policy, create an action plan for each of their implementation and Head of Law & Admin to present to the COMT for approval. | IG Group | 31.3.12 | COMT March 2012 Minute |
### MIG5  Corporate Responsibilities

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<th>Ref</th>
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<th>Actions</th>
<th>Responsibility</th>
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<th>Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.1</td>
<td>There are clearly defined corporate responsibilities for information governance.</td>
<td>“There is no formal over-arching responsibility for information governance, although elements of information governance eg Records Management and Information Security lie within the Corporate Services Department.”</td>
<td>• The Chief Executive will appoint a senior officer to lead the implementation of this Information Governance action plan. Each department will nominate an Information Governance Champion (IG Champion) and identify the relevant Information Asset Owners (IAOs).</td>
<td>CE and Directors</td>
<td>6.6.11</td>
<td>COMT 6 June 2011 Minute</td>
</tr>
</tbody>
</table>

| 5.2 | There are clear lines of accountability throughout the organisation leading to the Chief Executive. | Ditto | Clear lines of responsibility will be established, leading from individual members of staff, through the IAOs and the IG Champions, to the IG Group and the Chief Executive. | IGG and IGCs | 31.3.12 | COMT 6 June 2011 Minute |

### MIG6  Expertise

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<tr>
<th>Ref</th>
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<th>Actions</th>
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<th>Date</th>
<th>Evidence</th>
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<tbody>
<tr>
<td>6.1</td>
<td>The IG Group has access to the necessary expertise for all aspects of information governance, including FOI, DPA, information security and records management.</td>
<td>“Access to expertise is available within the Council for a number of the elements i.e. FOI, Data Protection and Information Security but there is at present no dedicated information governance resource”</td>
<td>Access to in-house expertise will be developed further by the IG Champions and their participation in the IG Group.</td>
<td>IGG</td>
<td>31.3.12</td>
<td>COMT March 2012 Minute</td>
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### MIG7  Managing and Monitoring

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<th>Ref</th>
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<th>Evidence</th>
</tr>
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<tbody>
<tr>
<td>7.1</td>
<td>The IG Group is responsible for managing and monitoring the improvement plan and reporting progress to COMT.</td>
<td>“There is no information governance group”</td>
<td>The IG Group will prepare, manage and monitor the IG Action Plan and report progress to the COMT.</td>
<td>Head of Law &amp; Administration</td>
<td>31.3.12</td>
<td>COMT March 2012 Minute</td>
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<tr>
<td>Ref</td>
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<tr>
<td>8.1</td>
<td>Training needs for information governance are evaluated and action taken to ensure they are delivered to staff.</td>
<td></td>
<td>IG Champions will ensure that staff training procedures within their relevant departments cover all aspects of information governance.</td>
<td>IG Group</td>
<td>31.3.12</td>
<td>COMT March 2012 Minute</td>
</tr>
</tbody>
</table>
| 8.2 | Staff induction procedures effectively raise the awareness of information governance. | “The induction procedure is limited to FOI and DPA matters and that within the managers section” | • Review of induction process by Head of HR  
• IG Champions will ensure that staff induction procedures within their relevant departments cover all aspects of information governance. | Head of HR, IG Champions | 31.3.12 | COMT March 2012 Minute          |

Feb 2011