

AUDIT & STANDARDS

13 JULY 2021

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Report Title	INFORMATION GOVERNANCE FRAMEWORK			
Purpose of Report	To adopt the Information Governance Framework.			
Decision(s)	The Committee RESOLVES to adopt the Information Governance Framework			
Consultation and Feedback	Leadership and Management Team have been consulted on the new Information Governance Framework			
Report Author	Marie Parkington, Information Governance Officer Email: marie.parkington@stroud.gov.uk			
Options	N/A			
Background Papers	None			
Appendices	Appendix A - Information Governance Policy Appendix B - Records Management Policy Appendix C - Data Protection Policy Appendix D - Data Breach Policy Appendix E - Privacy Notices and Retention Policies Appendix F - Information Complaints Policy Appendix G - Anonymisation & Pseudonymisation Policy			
Implications (further details at the end of the report)	Financial	Legal	Equality	Environmental
	Yes	Yes	No	No

1. BACKGROUND

- 1.1 Following an audit into the Council's GDPR arrangements, the Information Governance Officer role was created to coordinate the Council's Information Governance, activity, framework procedures and ensure compliance with data protection and freedom of information legislation
- 1.2 The role was appointed to in November 2020 and is located in the Policy and Governance Team with additional reporting to the Council's Monitoring Officer who is also the Data Protection Officer.
- 1.3 One of the responsibilities of this role is to create an up to date Information Governance Framework and to ensure that it is embedded across the Council, and organise appropriate corporate training as required.

2. INTRODUCTION

- 2.1 The Council generates and receives a huge amount of data. It therefore acknowledges that information is one of its key assets and as such requires the same discipline to its management that it would to other important assets such as people, buildings and finances. Information assets can be both electronic or paper and include records and data sets held in back-office systems, network/shared drives, and within email systems.

- 2.2 It is vital that the Council applies a robust information management system in ensuring the efficient and effective operation of services, meeting security and regulatory requirements, and demonstrating accountability for decisions and activities taken.
- 2.3 Councils must have in place an effective framework for how they collect, process, access, store, share and delete information and it is important to have a consistent approach. The Information Governance framework sets out best practice and standards which must be maintained together with responsibilities of individuals' for managing the information assets.

3. THE INFORMATION GOVERNANCE FRAMEWORK

3.1 Purpose

- 3.1.1 The purpose of the Information Governance Framework is to set out the Council's responsibilities and activities in relation to information governance in accordance with current legislation and professional principles.
- 3.1.2 Information governance describes the approach within which accountability, standards, policies and procedures are developed and implemented, to ensure that all information created, obtained or received by the Council is held and used appropriately.
- 3.1.3 The policy will provide a consistent approach and summarises the relevant regulations and the commitment of the Council to their application where appropriate.

3.2 Aims and Objectives

- 3.2.1 The aim of Information Governance is to achieve excellence in the management of Information assets and records so that the council can:
- Comply with regulatory, legal, audit and discovery requests, ensuring that there is clear guidance for all staff.
 - Access the right information from wherever it is needed, with permissions granted to the appropriate staff.
 - Share business information both inside and outside the organisation where appropriate, using sharing agreements. Data sharing will be undertaken in accordance with the Information Commissioner's Data Sharing Code of Practice.
 - Manage records using good practice standards, including identifying vital records and their systems and ensuring that they are protected. Ensure that at least annually, the record of Processing Activities questionnaire is completed by all Service areas and the Record of Processing register is updated to reflect any changes.
 - Control the unnecessary proliferation of information and remove duplicate or redundant information, by encouraging staff to work closely together and enabling better use of resources and reducing the number of opportunities for data to be compromised.
 - Dispose of information as soon as it reaches its legal and business usefulness in line with published Retention Policies.
 - Build an information governance culture where information and records are managed coherently and consistently across the council. Classify information under the correct record code by ensuring that staff follow the Records Management Policy.
 - Align all lines of business systems with Information Governance standards.
 - Educate employees about their Information Governance roles and responsibilities, by implementing a robust training plan, which sets out competencies for staff and the various ways to access learning.
 - Be open and transparent by keeping publications scheme up-to-date and responding to requests for information as mandated by the government.
 - Documented procedures for Freedom of Information Requests and Environmental Information Requests are also available to the public on the council's website.

- Ensure that we understand our own performance in relation to Information Governance and manage improvements in a systematic and effective way, working with Audit Risk Assurance to achieve an excellent standard of compliance.

3.3 Policy documents

3.3.1 The new framework consists of the following documents and guidance, and a link to these has been provided in the appendix section of the summary box:

- Information Governance Policy
- Records Management Policy
- Data Protection Policy
- Data Breach Policy
- Privacy Notices and Retention Policies
- Information Complaints Policy
- Anonymisation & Pseudonymisation Policy

4. AIM FOR 2021/22

- To continue to embed the new Information Governance Framework across the Council, keeping up to date with best practice guidance from the Information Commissioners Office.
- To provide advice and guidance as required.
- To ensure the appropriate training is provided for all staff and members, including mandatory induction training.
- To facilitate training sessions on FOIs with all FOI Champions to improve understanding.
- To review our Complaints Management processes and improve our service.

5. IMPLICATIONS

5.1 Financial Implications

There are no financial implications arising directly from this report. Costs associated with implementation, including training, are expected to be met from existing budgets

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5.2 Legal Implications

Whilst the Council has a number of legal obligations in respect of information governance which are reflected in the suite of policies produced, there are no specific legal implications arising from the recommendations in this report,

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5.3 Equality Implications

There are not any specific changes to service delivery proposed within this decision.

5.4 Environmental Implications

There are no significant implications within this category.