The Highland Council	Agenda Item **17**
Resources Committee – 23 November 2016	Report No **RES/ 86/16**

Information Management Strategy & Policy Framework Annual Review

Report by Depute Chief Executive/Director of Corporate Development

Summary
This report provides Members with information on the annual review of the Information Management Strategy and the policies that make up the Information Management Policy Framework.

1   Background

1.1   The council has a range of statutory and regulatory obligations in relation to the management of its information holdings, and in particular the management of personal data. The Information Management Strategy and Information Management Policy Framework are a necessary part of achieving compliance with the Data Protection Act, Freedom of Information (Scotland) Act and Public Records (Scotland) Act. The Council's compliance with these acts is regulated by the Information Commissioners (UK and Scotland) and the Keeper of Records of Scotland. We are also subject to assessment of our security compliance with the Public Services Network Code of Connection by the UK Cabinet Office.

1.2   Over the last 3 years there have been significant improvements in the Council's approach and governance of its information. This has been made possible through the work of the Corporate Information Management Team, Managing Information Project, Records Management Service and the Information Management Governance Board. This work is directed by the strategic vision that is set out in the Information Management Strategy.

1.3   The Information Management Strategy is supported by a range of policies that together make up the Information Management Policy Framework. The current versions of the strategy and policies were approved at Resources Committee on 25 February 2015. With a commitment to carry out regular reviews there has therefore been a review of the strategy and policies to ensure they continue to be fit for purpose.

1.4   The review of the Information Management Strategy and Information Management Policy Framework has been led by the Information & Records Manager and the changes reviewed and approved by the Information Management Governance Board prior to coming to committee to seek final approval.

1.5   This paper provides a summary of the changes that are being proposed as part of this annual review.

2 Information Management Strategy Review

2.1 The strategy has been reviewed, and minor changes made, but the overall strategic position set out in the Information Management Strategy remains relevant and fit for purpose.

2.2 To reflect the fact that the Information Management Strategy is a living document that is reviewed each year the reference to a period of time (2013-2017) has been removed from the title.

2.3 Updates have been made to reflect the strategic and legal need for the council to work towards making its data open and available for re-use, both externally and within the council. In addition there is a need to extract maximum value from the information we hold to deliver efficient services. Until recently the implementation focus was purely on controlling and structuring information. There is still work to do in this area but due to the implementation successes the focus now needs to move more towards enabling the council and others to exploit this information to deliver more value for the council and the local economy. Achieving these aims are challenging but the council's new ICT platform will offer us increased opportunities to realise this ambition in a cost effective way.

2.4 The strategy sets out 6 main streams of activity that will be used to plan work for the year ahead and together form a Corporate Information Management Programme. The strategic oversight of the delivery of the Information Management Strategy and the programme of work is undertaken by the Information Management Governance Board. The streams of activity have been realigned as a result of the review to support planning and reporting to the board.

2.5 Other changes are to improve clarity and to update job titles and roles following council structuring. The executive summary has been rewritten to more accurately reflect the high level strategy that is set out in the document.

3 Information Management Policy Framework Annual Review

3.1 The Information Management Policy Framework consists of a range of Council policies that together provide a framework that supports the delivery of the Information Management Strategy. The framework contains the

- Information Management Policy
- Records Management Policy
- Records Retention & Disposal Policy
- Information Security Policy (renamed Information Security & Assurance Policy)
- Data Protection Policy

3.2 The policies have been updated to reflect the changes in the strategy. Additional references to open data and re-use have been added to the policies. This is to support the council in meeting legal requirements under the Re-use of Public Sector Information Regulations 2015 (to allow re-use of data by default)

and INSPIRE (Scotland) Regulations 2009 and ongoing compliance with the Freedom of Information Scotland Act 2002 (proactive publication of council information).

3.3 A key change is the proposed deletion of the ICT Security Policy for Mobile & Flexible Working and the move of relevant content into the Information Security Policy. There are changes in policy statements to set out greater requirements for managers and Information Asset Owners to risk assess the handling of information in mobile and flexible working arrangements. It also requires local business processes and procedures to take account of information security issues to ensure the confidentiality, integrity and availability of information being handled. This change responds to Internal Audit recommendations and removes some policy statements that were no longer consistent with the Information Security Policy and ICT Acceptable Use Policy, in particular relating to the use of the old WebVPN service.

3.4 The policy title of the Information Security Policy has been changed to the Information Security & Assurance Policy to better reflect the extent of the policy and an increased focus on a risk management approach to the management of council Information.

3.5 Changes have been made across the policies to reflect the current position with protective marking and the use of the Highland Council Security Classification Scheme. This continues to require the use of the Highland Council Security Classification Scheme where information is protectively marked but recognises that supporting tools are not present to aid this at present. An additional section has been added to the Information Security & Assurance Policy to provide a clear policy statement on this.

3.6 Sections 7 and 8 of the Data Protection Policy have been re-drafted to reflect the practice of data processing agreements forming part of the contracts with suppliers, rather than being separately put in place.

3.7 The Records Retention & Disposal Policy has been updated to include reference to records held on behalf of other organisations. This is a small but important change, and is required to ensure the council meets its obligations in relation to management of records held on behalf of other organisations such as the NHS. Additional consideration of the ownership of records is now required as a result of the changes made to the policy and work has started to identify external records and record these in the Corporate Information Asset Register. This responds to Internal Audit recommendations.

3.8 The Records Retention & Disposal Policy has been updated to enable automated deletion of electronic records. This still requires the appropriate retention period to be used, but will allow the use of automated processes required as part of any implementation of an Electronic Document & Records Management System. This exception requires the approval of the Information Asset Owner and Information & Records Manager prior to this automated process being enabled.

6. Implications

6.3 **Legal & Risk:** There are no implications arising from this review. An effective Information Management Strategy and Information Management Policy Framework support the council in its compliance activities.

6.4 **Resource:** The implementation of this Strategy will continue to be delivered using existing staff resources identified within the Corporate Information Management Team and Records Management Service. Through detailed planning of the implementation, additional resource requirements may be identified and brought to the Executive Leadership Team for consideration.

6.5 **Climate Change / Carbon Clever:** There are no implications arising from this Strategy review; however the more effective management of information and moving to electronic rather than paper based systems will support the council's commitment to becoming more Carbon Clever.

6.6 There are no **Equalities, Gaelic or Rural** implications arising from this review.

Recommendations

Members are asked to:-

  1   Approve the updated Information Management Strategy
  2   Approve the deletion of the ICT Security Policy for Mobile & Flexible Working
  3   Approve the updated Information Management Policy Framework policies

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Background Papers:

Information Management
Strategy http://www.highland.gov.uk/download/meetings/id/71174/item_17_information_management_strategy

Information Management
Policy http://www.highland.gov.uk/download/meetings/id/71175/item_17_information_management_policy

Records Management
Policy http://www.highland.gov.uk/download/meetings/id/71176/item_17_records_management_policy

Records Retention & Disposal
Policy http://www.highland.gov.uk/download/meetings/id/71177/item_17_records_retention_and_disposal_policy

Information Security & Assurance
Policy http://www.highland.gov.uk/download/meetings/id/71178/item_17_information_security_and_assurance_policy

Data Protection
Policy http://www.highland.gov.uk/download/meetings/id/71179/item_17_data_protection_policy