



# Information Governance Strategy

2021 | 2023

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# 1. Introduction

## Foreword by the Assistant Director of IT and Digital

Information is a vital asset for the Council, including our wholly owned company Worcestershire Children First (WCF), supporting both day to day operations and the effective management of services and resources. As well as protecting and providing the rights of access to public and personal information, it plays an increasingly strategic role in the way in which the Council is regulated and held accountable by external bodies. Insight and intelligence gathering from our data is key to understanding our performance. Therefore, it is essential that all information is managed effectively within a robust governance framework.

As a provider of a range of services, the Council carries a responsibility for handling and protecting information of many types. These types of information include personal data, commercially sensitive and other confidential data, non-confidential data, and publicly available data. Having accurate and relevant information available at the time and place where it is needed, is critical in all areas of the Council's business and plays a key part in corporate governance, strategic risk, service development and performance improvement and overall meeting the needs of our customers. It also supports a Council commitment to transparency and the Open Data agenda. Good Information Governance will enable the Council to meet national requirements and best practices including relevant codes of practice and annual submissions of the Information Governance Toolkit.

This strategy describes the development and implementation of a robust Information Governance (IG) framework needed for the effective management and protection of organisational and personal information.



## Background

Information Governance describes the matrix approach to our information within which accountability standards, policies and procedures are developed, implemented, and maintained to ensure that all information used by the Council is appropriately sourced, held, and used - securely and legally.

IG therefore covers all information held by the Council (for example – staff, financial, estates, corporate, minutes) and all information systems used to hold that information. These systems may be purely paper- based or partially or totally electronic. The information concerned may be ‘owned’ or required for use by the Council and hence may be held internally or by external commissioned providers.

The Council is obliged to abide by all relevant UK legislation. The Information Governance agenda is formed by those elements of law and policy from which applicable IG standards are derived. It encompasses legal requirements, central guidance and best practice in information handling including:

<b>Common law Duty of Confidentiality</b>	<b>Data Protection Act 2018</b>	<b>UK General Data Protection Regulation</b>	<b>Privacy and Electronic Communications (EC Directive) Regulations 2003</b>	<b>National Data Guardian Standards</b>
<b>Data Security and Protection (DSP) Toolkit</b>	<b>Freedom of Information Act 2000</b>	<b>Environmental Information Regulations 2004</b>	<b>Re-use of Public Sector Information Regulations 2015</b>	<b>Human Rights Act 1998</b>
<b>Care Act 2014</b>	<b>Health and Social Care Act 2001 and 2012</b>	<b>Computer Misuse Act 1990</b>	<b>Crime and Disorder Act 1998</b>	<b>Regulation of Investigatory Powers Act 2000</b>
<b>Information Security</b>	<b>Data Quality</b>	<b>Records Management</b>	<b>Confidentiality and Information Risk</b>	<b>Openness and Transparency</b>

WCC / WCF requires accurate, timely and relevant information to enable it to deliver the highest quality services and to operate effectively as an organisation. It is the responsibility of all staff to ensure that information is accurate and up to date and that it is used proactively in its business. Having accurate relevant information available at the time and place where it is needed, is critical in all areas of WCC / WCF's business and plays a key part in corporate governance, strategic risk, service planning and performance management.

Both WCC and WCF process Personal Data (PD) in the course of conducting their business activities and therefore are accountable for, and must be able to demonstrate, our compliance with data protection legislation.

As a provider of social care, WCC / WCF are accountable for, and must be able to demonstrate our compliance for handling and protecting information of many types; some information is confidential because it contains personal details of service users, their families or staff. WCC / WCF must comply with data protection legislation which regulates the holding and sharing of confidential and special category PD. It is important that relevant, timely and accurate information is available to those who are involved in the care of service users.

It is important that PD is not shared more widely than is necessary. Some information is non-confidential and is for the benefit of the general public. WCC / WCF and its employees share responsibility for ensuring that this type of information is accurate, up to date and easily accessible to the public. Most of the information about WCC / WCF and its business should be open for public scrutiny although some information may need to be safeguarded, including that which is commercially sensitive.

As part of this Strategy it is also acknowledged that not all information risk can be eliminated. Ultimately it is for the organisation to decide which risks it is prepared to accept based on the knowledge that effective risk assessment has been carried out and the risk has been reduced to an acceptable level as a consequence of effective controls.



## Purpose

This Information Governance Strategy is about how the Council creates, communicates, stores, uses and distributes the information we need to deliver our services and corporate objectives. It covers all information in all formats – paper and electronic (including graphical, audio and video files).

The Strategy sets out the Council's principal aims in terms of ensuring that it manages and processes information in a lawful manner and in a way that supports service delivery.

This Strategy is part of a set of information governance policies and procedures that support the delivery of the Council's strategic approach to Information Governance and should be read in conjunction with these associated policies.

This Strategy applies to all Council and Worcestershire Children First employees and workers (both contracted and agency workers), contractual third parties and commissioned providers, volunteers, and Councillors (when acting on behalf of the Council and Worcestershire Children First).

This Strategy will add value to the information resources used by the Council and will promote efficiency. It will demonstrate that the Council has a commitment to providing high quality information and takes its role as a custodian of information seriously. Information is different from every other resource – when it is produced and used, it increases rather than decreases.



## Executive Summary

This Strategy establishes a framework and ethos for information governance that needs to be embedded across Worcestershire County Council and Worcestershire Children First. The Strategy provides a comprehensive and corporate approach to all aspects of information governance that is consistent, safe and effective. In doing so, the Strategy reflects the increasing legal framework that is now imposed on public sector information through legislation such as the Freedom of Information Act (2000), the Data Protection Act (2018) and the requirements for respect for private life and freedom of expression in the Human Rights Act (1998) whilst reflecting the increasing need to share relevant information with partners.

The principles which underpin our approach to Information Governance are:



Relevance,  
accuracy and  
openness



Security and  
confidence



Accessibility



Effective delivery



This Strategy aims to embed these principles within the organisation and in the way we work internally and with our partners.

Information may be defined as data plus structure. The Strategy seeks to provide a context and structure for the data the Council holds so that all may benefit. The IG Strategy applies to all recorded information irrespective of content, format or source. The Strategy primarily defines information management as the means by which the Council looks after information from its creation to its disposal. Secondly, the means by which it identifies the value of the information and maximises its use, whether by supporting service delivery or commercially.

The IG Strategy should not be viewed as a static document but one that will evolve over time to reflect changes in best practice, legislation or Council priorities. At the heart of the IG Strategy lie four overarching themes that address the key areas for improvement and determine the overall plans for the continued development and of information governance. These themes are:

An appropriate IG Structure



An effective IG Policy Framework



Excellence in records and document management



Changing the IG culture throughout WCC



## Linked Strategies and Programmes

The IT Strategy has been written to align with and complement our national, organisational and partner strategies to deliver a whole Council approach, as listed below:

- ◆ UK Digital Strategy
- ◆ National Data Strategy
- ◆ Building Digital UK (BDUK)
- ◆ Corporate Plan - Shaping Worcestershire's Future
- ◆ WCC Digital Strategy 2021-2023
- ◆ WCC IT Strategy 2021-2023
- ◆ WCC Data management and Insight Strategy 2021-2023
- ◆ WCC Cyber Security Strategy
- ◆ Adults Digital Strategy
- ◆ Highways & Transport Strategy
- ◆ Strategic Economic Plan / Local Industrial Strategy
- ◆ Worcestershire Library Strategy
- ◆ Hereford & Worcestershire Sustainability Transformation Partnership Digital Strategy
- ◆ Integrated Care for Older People in Worcestershire Strategy
- ◆ Worcestershire Children First Business Plan





In addition to the Organisational Redesign Programme the Council has several cross cutting organisational transformation programmes currently in progress or in the early stages of development:

- ◆ Digital Transformation Programme
- ◆ Re-Imagined Front Doors & Customer Management Strategy
- ◆ Organisation Transformation Programme
- ◆ Social Care Case Management Phase 2
- ◆ Economy and Infrastructure Technology Programme
- ◆ People Technology Programme
- ◆ Worcestershire Children's First Technology Programme
- ◆ Digital Skills Programme (Public Health)
- ◆ Sustainable Transformation Partnership

## Values

Information is a valuable Council asset that requires effective management. With the development of new corporate IT structures, it is timely to complement these structures with an Information Governance Framework that will apply to all information, both electronic and physical. Further impetus is

provided by the need to ensure strong compliance within an ever growing and changing legal framework in relation to public sector information governance, as well as the need to be more efficient in the use and storage of information. The benefits of the Strategy will include:



Efficiency savings through the more effective use of physical, electronic, financial and human resources

Better customer service through improved access to relevant information, making requests easier to handle in a shorter amount of time

Environmental and financial benefits by reducing reliance on paper files and physical storage

Safely sharing information with partners -to ensure high quality, joined up service delivery

Increased openness - making high quality information available which is accessible and useful to citizens, including those with disabilities and special needs

Informed decision making - making use of high-quality information assets

Better working environment through the removal of irrelevant information and documentation from the office environment, allowing staff easier access to the information required for them to perform their work - this will have a positive impact on flexible working

## 2. Where are we now

### The journey so far

The Political Leadership are determined to transform Worcestershire into one of the most efficient Councils in the country. The more efficiency savings that are made, the more that can be invested into key services and the things that matter most to local people.

The Corporate Plan, Shaping Worcestershire's Future 2017-2022, identifies 4 Key Priorities:

- ◆ Championing Open for Business
- ◆ Supporting Children and Families
- ◆ Protecting the Environment
- ◆ Promoting Health and Well-being

A coherent approach to IG, enabling us to effectively manage and understand our information, will positively impact our ability to deliver meaningful outcomes in all these areas. In order to support the above key priorities, we therefore need a consistent approach to the following:

- ◆ The provision of clear, accurate information and records for the determination of Council policies and strategies
- ◆ Greater transparency and accountability, thereby enhancing the Council's credibility
- ◆ Easier access to streamlined information, leading to more effective performance monitoring and reporting
- ◆ An improved work environment for staff with reduced need for electronic and physical storage
- ◆ More effective information retrieval
- ◆ Development of secure and appropriate mechanisms for sharing information with our partners and commissioned providers
- ◆ Utilisation of the matrix working operating model to ensure areas of good practice are recognised and implemented across the whole Council
- ◆ Customer queries to be handled more quickly and effectively.



## Information Governance Structure

There will be defined information governance roles at all levels in the Council with ultimate responsibility for IG resting with the Strategic Leadership Team of the Council (SLT). These may be discrete from existing roles or incorporated as part of current roles within the organisation. In accordance with best practice WCC and WCF will also have a Senior Information Risk Owner (SIRO) and a Caldicott Guardian (CG) within each organisation at a senior level who acts as guardian of all things which come under the auspices of information governance.

Every directorate, service, team and member of staff creates recorded information and as such everyone is responsible for its management. Without the engagement and involvement of staff at all levels we will not manage our information effectively.

One of the main goals is to make good information governance 'business as usual' for all staff following the approach set out in this Strategy allowing specialised staff to concentrate on complex information governance issues. IG also needs a clear corporate reporting hierarchy to ensure that:

- ◆ implementation of the Strategy is given the appropriate level of direction,
- ◆ policies receive expedient corporate approval, and
- ◆ performance is continuously and effectively monitored.

This hierarchy may be incorporated into existing management structures or set up as a separate structure. For practicality, the former is better.



Information Governance Policy Framework

Information Governance Policies and Procedures

Information Risk and Security

Access to Information

Information and Records Management

## Information Governance Policy Framework

Clear and coherent policies are in place for access to information, data protection, information and records management, information sharing and information security and surveillance. These policies deal with issues of compliance, consistency, use of information in relation to Council priorities and privacy. Any new policies must integrate with existing policies and procedures. All information governance related policies are part of a comprehensive, coordinated information policy framework designed to deliver the IG principles detailed earlier on in this document.

### Information Risk and Security

Providing corporate standards for the security of information held by the Council and meeting the Data Protection and Security Toolkit standards and the PSN Code of connection, including security classification of records. The Public Services Network (PSN) provides a secure network between central government, every local authority in England and Wales, and other public bodies including the Police.

### Access to Information

Relating to public requests for access to Council held information including those under Freedom of Information (FOI), Data Protection Act (DPA), and Environmental Information Regulations (EIR).

Establishing principles and procedures for the development of information sharing with partners, data processors and within the Council. To achieve this via formal protocols or otherwise, supporting our aim to become an excellent commissioning authority. This workstream will need to take into account the various legal issues relating to information sharing, for example satisfying the requirements of the Data Protection Act in connection with the need to reduce crime or shared information between Adult Social Care and Health.

### Information and Records Management

Regulating the maintenance of all Council held records throughout their lifecycle and meeting government standards and the Code of Practice under section 46 of the Freedom of Information Act. Records Management will incorporate the archival policies relating to the Corporate records transferred to the Archives and Archaeology Service for permanent preservation. This will enable the organisation to adopt a system where there is a single corporate record of recorded information.

Dealing with the creation of documents, filing, security, data migration, managing access/ownership, digital preservation, disposal, disaster recovery and authentication. In particular, the policy will enable more effective collaboration and version control.



## Information Management Principles

All parts of the Council must adopt a culture that uses and promotes good information management practices.

Information will be managed as a corporate resource and structured to facilitate information sharing across the Council and with our partners.

Information will be accurate and up to date to support the Council's operations, decision making process and, so far as possible, the needs of our partners.

The creation, storage and use of information will conform to legal and regulatory requirements as well as any Council guidelines and policies.

Where feasible, information will be captured and stored only once and reused as needed. Where duplication of information is unavoidable then this will be allowed provided there is a single authoritative source and measures are in place to ensure consistency.

# 3. Where we want to be

## Our vision

“Information governance will play a central role in helping the Council maximise the value of its information and reduce associated costs and risks. This will manifest itself in multiple ways, including a reduction in the volume of outdated and useless information stored, as well as fewer data breaches. Most information will be managed in an automated way (through machine-based learning and big data techniques and technologies) to drive significant internal value from our information”.

## Information and Records Management

A cornerstone of this Strategy is effective Information and Records Management and as such, this forms a major work-stream in the Council’s journey toward excellence in information governance. Effective information and records management will result in:

- ◆ improved business efficiency and effective use of IT resources
- ◆ structured management of records retained for legal and regulatory purposes
- ◆ support of accurate capture and management of electronic records (irrespective of format) into the file system
- ◆ appropriate access to records to enable informed and effective decision-making protection of the rights and interests of the Council (and others) who the Council retains records about
- ◆ protection of the characteristics of records as defined by ISO 15489, particularly their reliability, integrity and usability
- ◆ information security becoming simpler and more effective
- ◆ reduced risk of enforcement action
- ◆ a common corporate standard for the classification and storage of information, improving retrieval, disposal and re-use of information
- ◆ disposal process for information in compliance with our legal and regulatory obligations
- ◆ automated processes to fast-track actions and minimise staff involvement
- ◆ reduction in unnecessary retention and duplication of information
- ◆ retention of a corporate memory of transactions, decisions and actions taken by, or on behalf of, the Council that can be preserved with the Archive and Archaeology Service





## Disposal Schedule

The Council maintains a Disposal Schedule, developed in line with local and national best practice and guidance including the Information and Records Management Society Local Government Classification and Retention Scheme (LGCRS), which details the retention and disposal requirements for records created, held and maintained by the Council. All Council records should be retained in line with this schedule regardless of format.

## Information Asset Register

Effective information governance requires the Council to accurately know what information it holds at any given point in time. An Information Asset Register plays an important role in being able to demonstrate the Council has taken steps to understand and protect these assets, as required under data privacy legislation. Legislation also increasingly requires public registers of information, for example the requirement under FOI to maintain a Publication Scheme describing the publicly available information held by the Council. The Council's Information Asset Register will be maintained to ensure comprehensive and consistent capture of this knowledge. The benefits include:

- ◆ Ensure compliance with legislative requirements (building on the existing publication scheme)
- ◆ Identify the designated Information Asset Owner (IAO) with responsibility for each information asset
- ◆ Identify the Data Owner who operationally manages each information asset
- ◆ Identify which assets contain Personal Data
- ◆ Identify what actions have been taken to comply with data privacy legislation
- ◆ Identify means of access to information
- ◆ Identify classification under the Council's Information and Cyber Security Policy
- ◆ Identify retention period and necessary action at disposal

The IAR will have designated ownership and will be ruled by updating cycles and version control. The summary IAR will also be available on OurSpace.

The overlap in information captured by the IAR and Disposal Schedule, and the time spent maintaining them separately, incentivizes the collation of these two registers into a single document. The ambition is to investigate whether this proposal is practical, develop a system to manage the data going forward and begin to harmonise the content so that they can be combined together.





## Corporate File Plan

There is an overarching framework for organising files, both electronic and physical, throughout the Council – the Corporate File Plan (CFP). This has been developed to promote consistency across the whole Council whilst enabling flexibility for services and teams to adapt the framework to suit their specific needs, in recognition that ‘one size doesn’t fit all’. The CFP registers ensure that all areas where unstructured electronic information is stored, including network shared drives, Yammer, MS Planner, Teams and SharePoint sites, are registered, together with nominated Data Owners responsible for the information. Furthermore, data ownership will be recorded and managed for permission groups relating to Email Distribution Groups, Shared Inboxes and SSRS reports to ensure there is appropriate accountability for access to these groups.

The implementation of Microsoft Teams and SharePoint is vital to the success of meeting the objectives of the Collaboration Strategy and utilising SharePoint as an Electronic Document and Records Management System (EDRMS) solution. A phased approach will deliver Microsoft Team sites to the whole organisation in 2021 and then migrate data from file shares to SharePoint Online. The customisation of the Office 365 Compliance Centre will need to reflect national guidance and standards, in particular the National Archives’ guidance on electronic records management. It must seek, as far as practical, to:

- ◆ Have a single corporately agreed basis for classification
- ◆ Be simple to use
- ◆ Allow for the tracking and location of file information at any stage in its life cycle
- ◆ Allow for information relating to a single issue to be identified and collated quickly and accurately
- ◆ Enable automation for the labelling and disposal of information
- ◆ Be compatible with the Information Asset Register (IAR), IG policy framework, legal requirements for accessing information, and the Disposal Schedule
- ◆ Ensure privacy and confidentiality are appropriately respected and maintained (including compatibility with the information security and data protection policies and where appropriate the Caldicott principles)
- ◆ Be achieved within existing Council resources
- ◆ Allow for exceptions, where this meets statutory requirements, is a tolerable/ manageable risk and/or is the value for money solution, e.g. where a service already operates a ‘stand-alone’ file classification system that works effectively and is compatible with the aims of the IG Strategy

## Document Management

Due to the diverse nature of the activities undertaken by the Council, it is impractical to adopt a single mandatory approach to managing individual documents. Therefore, individual document management will need to be determined at function, service or team level in accordance with the relevant Corporate Information Management Principles.

Any document management and/or business system utilised should, at minimum:

- ◆ make individual documents readily available
- ◆ ensure adequate security, confidentiality and privacy
- ◆ be simple to adopt and maintain
- ◆ facilitate the automated disposal of documents at the end of their retention period

The creation and maintenance of information in the appropriate format is imperative; therefore, corporate guidance should be sought to outline available options for information and records management, including their suitability for capturing different types of records.

The table below details the storage repositories available, and the order of preference to be considered when determining the approach.

<b>Document management / Business systems</b>	Business systems with the capability to securely store and manage digital records and documents in conjunction with the specific cases and requests managed by the system.
<b>MS Teams / SharePoint</b>	MS Teams and SharePoint provide document management capabilities together with facilities for sharing and collaboration.
<b>File Shares</b>	File Shares (U or SU Drives) that staff can use to share documents, or work in other cooperative ways such as joint authorship, contributory data storage, etc. Strategically the Council is moving away from the use of File Shares in preference to options 1 and 2 above.
<b>Paper records</b>	Council employees will cease the creation of paper records unless legally required. Where there is a legal requirement, these records must be deposited with CIGT when they are closed, these records must be deposited with CIGT when they are closed in accordance with the Council's Disposal Schedule.

Please note that the storage of records in the email system is not acceptable. Any emails determined to be business records should be held in separate repositories in accordance with the table above.



### **Enabling Information Governance through Technology**

This Strategy will be supported and enabled by technology for example providing appropriate tools to collaborate and share with partners, solutions to appropriately structure and analyse data, methods of protecting the integrity, accuracy and reliability of our information, and improving our ability for information transparency.

Technology is both a driver and enabler of information governance. Technology impacts on how we can create, handle, access, share and retain data; increasingly this is by digital means. Selecting the correct technological solution must involve consideration of the information governance implications including - security, management of records, accessibility, and legislative compliance.

The IG Strategy has 7 priority areas of focus, one being the effective and efficient use of data and information, where we want to be:

- ◆ Joining up data sets to provide a single view and use standardised data sets
- ◆ Embrace sharing data where it benefits other services
- ◆ Use real time data for improved service delivery
- ◆ Meet the challenges of digital preservation, ensuring continued access to digital information in the future

## Our Information Governance priorities

### Priority 1 – Championing Openness and Transparency

Demonstrating efficiency in local government and beyond through our on-going commitment to open data, whilst recognizing the need for an appropriate balance between openness and confidentiality in the management and use of information. Recognising the need to share service user information with partner organisations (particularly health and social care) and other agencies in a controlled manner consistent with the interests of the service user and, in some circumstances, the public interest.

### Priority 2 – Effective Management

There are very clear benefits to effective information governance to deliver effective Council services, putting service users at the heart of all we do. To realise these benefits will involve time and effort by all services and by all members of staff.

### Priority 3 – Legal Compliance

All practices and procedures relating to handling and holding personal information must be legal and confirm to best and /or recommended practice.

### Priority 4 – Information Security

The principles of corporate governance and public accountability places importance on the confidentiality of, and the security arrangements to safeguard, both personal information about service users, families and carers and staff and commercially sensitive information.

### Priority 5 – Delivering Innovation and Value

Empowering managers to embed Information Governance in each of their services and use data creatively to become a data driven organisation.

### Priority 6 – Quality Assurance

Accurate, timely and relevant information is essential to deliver high quality services and it is the responsibility of all managers to ensure and promote the quality of information and to actively use information in decision-making processes.

### Priority 7 – Reduction in Paper Records

The Council will become a near paperless organisation that maximises the use of technology to avoid the need for reliance on paper and manual processes. This will support the Council's printing reduction strategy, diminish storage and disposal costs and allow staff to work effectively remotely.



# 4. Delivering Our Priorities

## The priorities for delivering the IG strategy are:

### Priority 1 – Championing Openness and Transparency

- ◆ We will instil an Information Governance culture in the Council through increasing awareness and providing training on the key issues.
- ◆ We will ensure that clear advice is given to service users, families and carers about how their Personal Data is recorded, handled, stored and shared by the Council and its partners.
- ◆ We will ensure that non-confidential information about the Council and its services is readily and easily available through a variety of media, in line with the Council's FOI Publication Scheme.
- ◆ We will implement policies to ensure compliance with the Freedom of Information Act.
- ◆ We will have clear procedures and arrangements for liaison with the press and broadcasting media.
- ◆ We will have clear procedures and arrangements for handling queries from service users and the public.
- ◆ We will ensure information systems hold only the information required to support service and operational management.
- ◆ We will ensure that, where appropriate and subject to confidentiality constraints, information is shared with partner organisations.

### Priority 2 – Effective Management

- ◆ We will maintain a clear reporting structure and ensure through management action and training that all staff understand IG requirements.
- ◆ We will undertake regular reviews and audits of how information is recorded, held and used.
- ◆ We will develop information systems and reporting processes which support effective performance management and monitoring.
- ◆ We will support corporate, financial and governance requirements.
- ◆ We will monitor and proactively manage performance targets for information requests, e.g. FOI and SARs.
- ◆ We will set clear targets to tackle the shift in culture, specifically regarding communicating and educating staff on IG topics and considerations, monitoring completion of mandatory IG training, and tracking compliance. Additional targets may also be set locally by DLTs recognising that one size does not fit all. Ultimately, any measures or targets set should cascade down into Performance Review objectives.
- ◆ We will undertake annual review of policies and arrangements for openness.

### **Priority 3 – Legal Compliance**

- ◆ We will ensure all practices and procedures relating to the handling and holding of Personal Data are legal and conform to best and/or recommended practices.
- ◆ We will regard all Personal Data relating to service users as confidential.
- ◆ We will establish and maintain appropriate policing, incident reporting procedures and Management Information Systems to enable monitoring and investigations.
- ◆ We will ensure all our systems are compliant with the Data Protection Principles and enable the rights of individuals.
- ◆ We will establish and maintain policies to ensure compliance with the Data Protection Act, Human Rights Act and the common law duty of confidentiality and all associated guidance.
- ◆ We will promote effective confidentiality and security practice to ensure all permanent/temporary, contracted staff and third-party associates of the Council adhere to this via appropriate laid down policy procedures, training and information awareness schemes/documentation.

### **Priority 4 – Information Security**

- ◆ We will provide clear advice and guidance to staff and ensure that they understand and apply the principles of Information Governance to their working practice in relation to protecting the confidentiality and security of Personal Data and to ensuring the safe keeping and handling of Council business information, ensuring compliance with appropriate legislation.
- ◆ We will maintain an Information Security and Cyber Policy along with respective procedures for effective policing and secure management of all information assets, resources and IT systems.
- ◆ We will ensure there are robust procedures for notifying and learning from IG breaches and incidents.

### **Priority 5 – Delivering Innovation and Value**

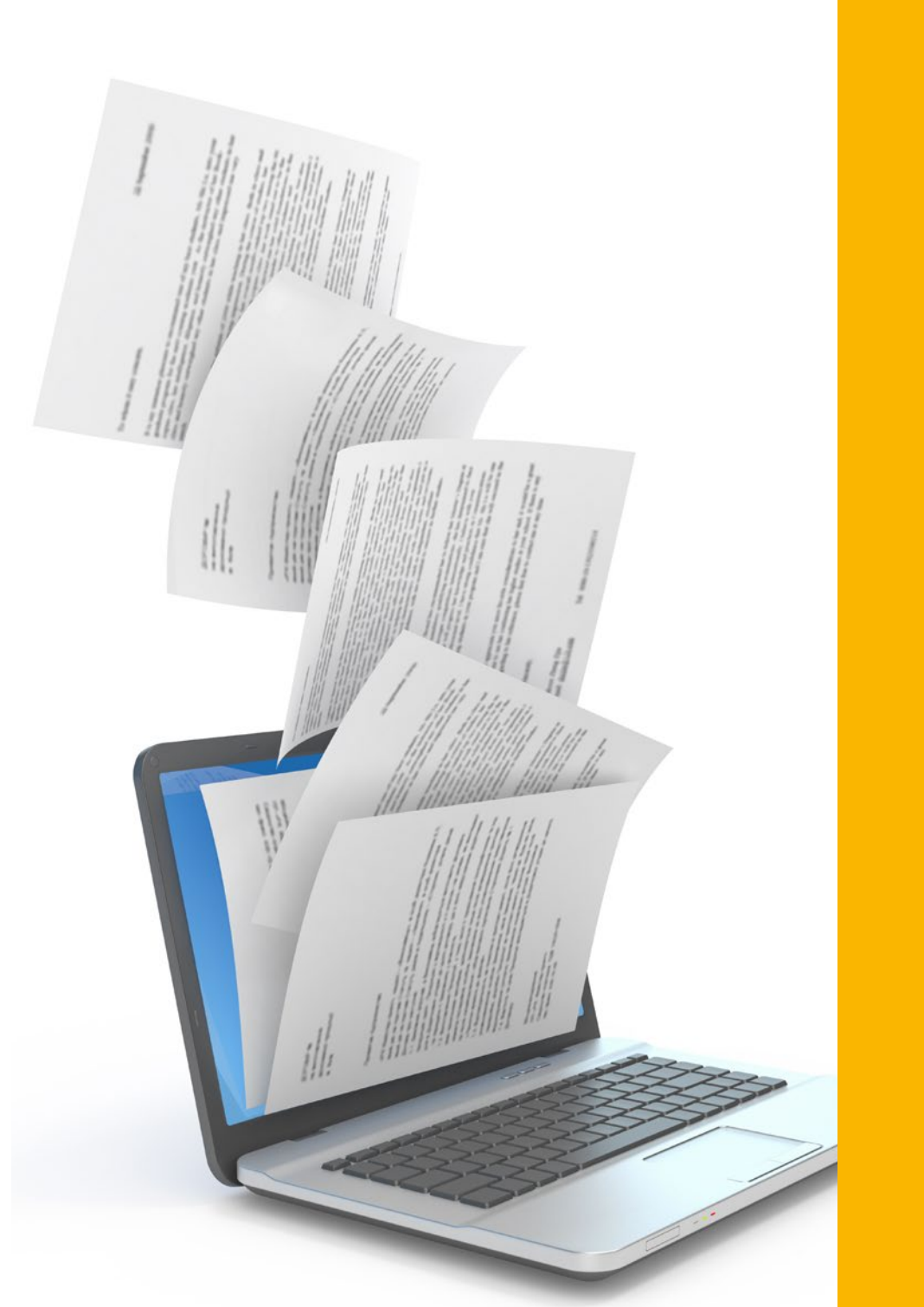
- ◆ We will ensure that when service developments or modifications are undertaken, a review is undertaken of all aspects of information governance arrangements to ensure that they are robust and effective, including a DPIA as appropriate.
- ◆ We will ensure procedures are reviewed to monitor their effectiveness so that improvements or deterioration in information handling standards can be recognised and addressed.
- ◆ We will be compliant with the Data Security and Protection Toolkit (DSPT) and develop and implement action plans to ensure continued improvement.
- ◆ We will regard all Personal Data as confidential except where national policy on accountability and openness requires otherwise.
- ◆ We will conduct information audits throughout the organisation to improve our disposal schedule and our register of information assets.
- ◆ We will establish and maintain policies for the controlled and appropriate sharing of service user information with other agencies, taking account of relevant legislation (e.g. Health and Social Care Act, Crime and Disorder Act, Protection of Children Act).

## Priority 6 – Quality Assurance

- ◆ We will establish and maintain policies and procedures for information quality assurance and the effective management of records.
- ◆ We will ensure that key data relating to service users is accurately recorded and maintained including regular cross-checking against source data to ensure that managers are required to take ownership of and seek to improve the quality of information.
- ◆ We will promote information quality and effective records management through policies, procedures/user manuals and training.

## Priority 7 – Reduction in Paper Records

- ◆ We will scrutinise and challenge all incoming paper deposits to identify workstreams that could be digitalised.
- ◆ We will research historic trends for teams depositing paper records and proactively engage with them about alternative digital solutions.
- ◆ We will provide advice through face-to-face, OurSpace, training and workshops.
- ◆ We will undertake a cross directorate audit of paper in the authority to establish a position statement and forward plan of areas for improvement.
- ◆ We will create digital solutions to re-engineer and replace existing paper processes.
- ◆ We will cease the creation of paper records unless legally required or alternative digital solutions are non-viable.
- ◆ We will support Council services in digitising paper records where appropriate.
- ◆ We will invest resources into reducing the disposal backlog, establishing an ongoing programme to dispose of old paper records once they reach their retention date.



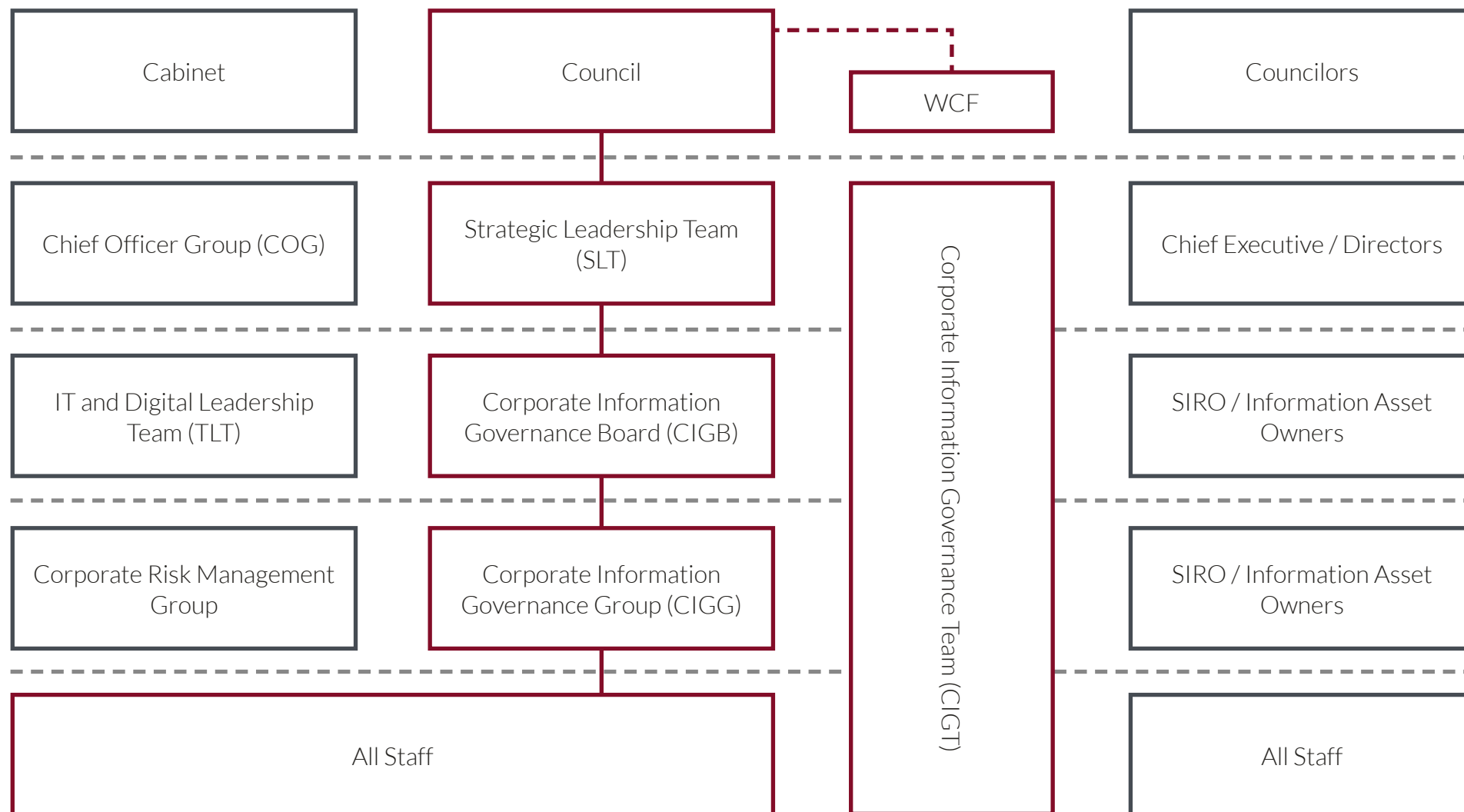


# 5. Delivering Change, Monitoring Progress and Measuring Success

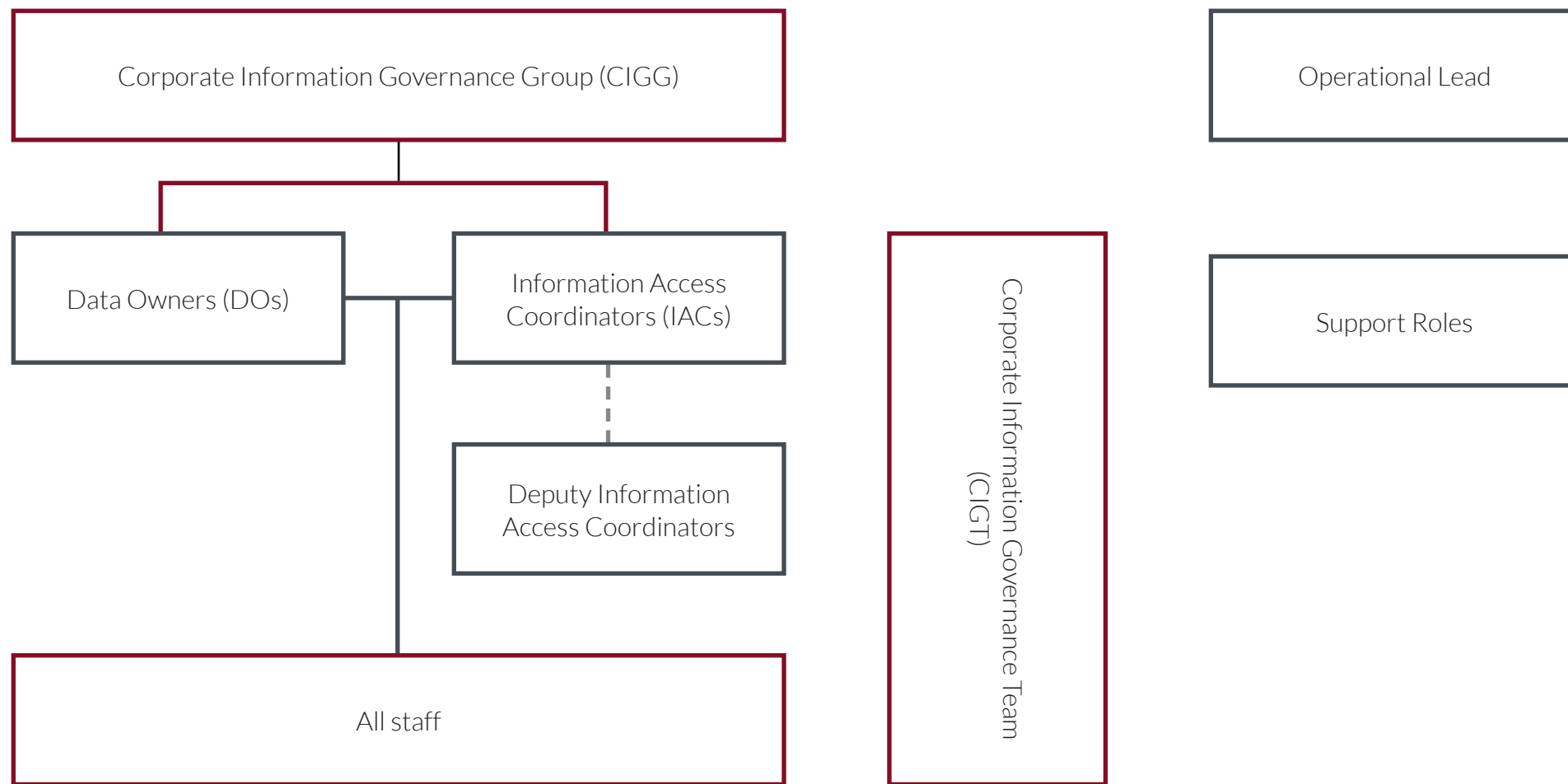
## Resourcing the Delivery

Funding for the Information Governance Strategy 2021-2023 will be incorporated within IT and Digital’s revenue budget and capital programme and drawn down based on costed business cases. Additional resources and investment may also be required if the pace of delivery required by the business is greater than our current delivery capacity.

## Responsibility Structure



## Operational Support Arrangements



## Monitoring and Reporting Progress

The monitoring and performance management theme is the central pillar in creating an organisation that manages its information in the best way possible. This will help the organisation to ensure that it is on track and ensure that the work we are doing is delivering a tangible difference to our staff, members, residents, visitors, communities and businesses of Worcestershire.

Therefore, this strategy will be supported by a robust implementation plan which will evidence the delivery of our priorities and will set out key milestones and achievements. Progress in implementing the strategy and delivery plan will be reported to CIGB.

Additional targets may also be set locally by DLTs recognising that one size does not fit all. Ultimately, any measures or targets set should cascade down into Performance Review objectives.

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