

Training
AWARENESS
POLICIES
PROCEDURES
GOVERNANCE
RESPONSIBILITY
DATA PROTECTION
CODE OF PRACTICE
WASPI
DATA SHARING
INFORMATION MANAGEMENT
COMPLIANCE
AUDIT
Link Officers
Strategy
ACTION PLANS
RETENTION
INFORMATION SECURITY
BREACH
MANAGEMENT

INFORMATION MANAGEMENT STRATEGY

2016-2019

Document Control Sheet

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This document is to be read in conjunction with the following documents:

- The Council Plan
- Information Management Action Plan
- ICT Strategy

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V2.0	15.6.17	Update Re-use of Public Sector Information Regulations	From 2005 to 2015

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FOREWORD



The way we manage information has changed immensely in the past few years.

A lot of this is down to technological development – which continues to change the world we live in at a staggering pace.

The other key factor has been the emergence of new legislation and regulations. Because technology evolves so quickly, legislation can often lag behind. But some key statutes, case decisions and other legal precedents have helped us identify clear priorities and principles.

This is really important. If we don't manage our information in the right way, the consequences for us – and our customers – could be huge.

So I'm genuinely pleased to introduce our second Information Management Strategy. It's a key document that will help us achieve the objectives in our Council Plan by promoting a developmental approach, which recognises information management as a key corporate function.

Not only will it help ensure the right nuts and bolts are in place – things like record lifecycle, information risk and data sharing – but it'll also help grow the right culture of information governance and responsibility.

Without doubt, this strategy has my full support.

Helen Paterson
Chief Executive



Information is a vital part of the Councils decision making function. The complexity and volume of information we use and need is increasing. The Information Management Strategy 2016-2019 helps to shape how we work with this information in a compliant environment, while acknowledging the challenges facing the Council, in terms of capacity and capability.

Against the background of a changing culture of information management, the new strategy is an important guide for navigating the regulatory landscape. The new strategy highlights the commitment of the Council to the future and the potential to build on what has already been achieved in the first strategy.

The Council has a responsibility to safeguard the information it holds and to manage it with care and accountability. Managing information effectively and securely through times of change demands an integrated, well-resourced approach. This is the key cornerstone of the new strategy.

Lee Robinson

Executive Director and Senior Information Risk Officer (SIRO)

1. THE PURPOSE OF THE STRATEGY

The purpose of the 3 year strategy is to set a direction for the effective governance, efficient management and use of information and data under the Council's control.

Information management deals with the creation, storage, access, protection and lifecycle of information and data. This is now an important issue for the Council as there is an increased need to focus on the overall value and accuracy of information, how it is used, stored and protected.

Information is central to the Council and its decision making processes, it therefore needs to be accurate and accessible to those who need it at the time and place that is required.

The Council has a statutory duty to maintain records – in both paper and electronic formats – and to make its information available to the public as appropriate.

2. Strategy Development

Wrexham County Borough Council (WCBC) first developed and published its Information Management strategy in 2013. Managing information successfully and appropriately was the primary objective. The first strategy led to considerable improvement in Information Management and the Council has achieved major improvements in the effective management of its information.

Increasing demands for the right to access information means the relationship between the public and the Council is constantly evolving.

This strategy has been developed in conjunction with key stakeholders including the Senior Information Risk Officer, Strategic Leadership Team, Senior Management Team, Information Management Group and Information Security Group. The new Strategy sets out the Council's approach to managing knowledge and information to achieve the right balance between making information more widely available to the public, whilst ensuring that adequate protection is in place. It aligns with the Council's Council Plan and other supporting strategies.

3. Information Management Strategy

3.1. Where we are now

The strategic initiatives that were previously set out in the 2013-2016 strategy have been carried forward and an Information Management Strategy Action Plan was created. The Council will sustain the focus on this important element of information management so that the public can maintain trust and confidence in the way the Council operates.

As part of the significant improvement in information management arrangements within the Council, an Information Management Group (IMG) was created in 2013. Part of the role of this Group is to oversee and govern the delivery of the Information Management Strategy.

3.2. Moving forward

The IMG has proven invaluable in leading this work and providing a focus for the Council's activity in this area. The group will be leading the creation of a new Information Management Strategy Implementation Plan for 2016-2019, that will focus on strategic initiatives that can be delivered in a cost effective way and that can be adequately resourced.

In view of the large agenda and finite resources, it is necessary to prioritise areas of development activity in accordance with the associated risks. Priority areas for development each year will be identified by the Information Management Group through its Information Management Strategy annual action plan, Business Continuity plans and the ICT Strategy annual action plan, 2016-19.

The Information Management Team has looked into the Information Commissioner's Office (the ICO) published report on 'Findings from ICO audits of 16 local authorities' in 2013. The audit assesses the arrangements that an organisation has in place for complying with the Data Protection Act 1998 (DPA) and the extent to which they are adhering to them. The report also sets out areas of good practice and useful case studies which Wrexham County Borough Council will look into over the next 3 years.

Information comes in many forms – policy documents, reports, minutes, statistics, operational data, personal data – and is held in a variety of printed and electronic formats. This information is used across the departments in the Council to achieve the objectives set in the Council Plan.

3.3. Alignment with the Council Plan

The Council Plan is the overarching plan for the Council and defines where we focus our energies and resources, how we will judge our performance and the Council's contribution to the welfare of the economy and its people. The planned actions in the Information Management Strategy 2016-2019 have been aligned to the Council Plan to achieve the vision in the plan.

The guiding principles are:

- Citizens, Customers and Equality - Being at the centre of everything we do
- Members - Elected members as community leaders being at the heart of decision making
- Welsh Language – Supporting and encouraging customers and staff to communicate in Welsh and English

To maximise the potential benefit of the information held, the Council will manage it effectively, re-use it where it can, share it appropriately and ensure that the strategy aligns with the priority outcomes of the Council Plan.

The Council recognises that in order to achieve its priority outcomes in the Council Plan, the information management objectives need to focus on the following:

- Duty to protect the information – Information is the lifeline of the Council activity. Every day the Council process financial information, service user information, employee data, administrative information and more. The Council has a duty to put necessary measures in place to protect the information.
- Duty to share information - The duty to share information can be as important as the duty to protect its confidentiality. The Council recognises that there are certain situations when sharing of personal information is not just preferable, but vital.

Information Management Objectives aligned with Strategic theme 1 (Economy)

- Ensure that the Publication Scheme includes information which will support the priority outcomes by providing the information individuals and businesses need to inform their decision making
- Continue to promote transparency by carrying out Council business in meetings open to the public and expanding the web-casting of such meetings in so far as is practicable Continue to respond to 'access to information requests' within reasonable time for request made under Freedom of Information Act 2000 and Environmental Information Regulations 2004.
- The Council will continue to deliver its statutory duties in relation to information management by:
 - Preserving and managing the Council records with care under the Local Government (Wales) Act 1994 Section 60);
 - Considering the reuse of public sector data under the Re-use of Public sector Information Regulations 2015
 - Complying with the Public Records Act 1958 and the records management guidance set out in the code of practice issued under s46 of the Freedom of Information Act 2000

Information Management Objectives aligned with Strategic theme 2 (People)

Improving the way the Council manages its information results in delivering a seamless user service. This will enable the Council to deliver the tangible and visible benefits in an effective way to:

- Raise public confidence in the way the Council collects, manages and uses personal information
- Know what information the Council can share and how to share for legitimate purposes
- Provide assurance that risks are reduced and that customer's information is safe with the Council.

Information Management Objectives aligned with Strategic theme 3 (Organisation)

Effective management of information makes the Council more responsible and affords a wide range of benefits:

- Improve the data quality
- Improve informed decision making and policy development
- Ensure compliance with legislation
- Reduce levels of information-related risk and ensures that information is protected and secure
- Provide confidence and assurance to the Senior Information Risk Officer (SIRO) on effective information risk management in the Council departments;
- Retrieve information quickly and easily;
- Know what to keep and what to dispose of and when – removing duplication and the “keep it just in case” approach;
- Ensure that good information rights practice is embedded into the culture and day to day processes of the Council and into emerging technologies and systems.

4. The Approach

Key objectives to deliver the Council’s Vision through information management are set out in the Strategy. As in the Action Plan in Appendix A, a range of development work is currently underway, and planned for the future, to ensure consistent management of the Council’s information resources and minimise potential risks and threats.

1. **Training and awareness** - The provision and monitoring of staff DPA training and the awareness of DPA requirements relating to their roles and responsibilities
2. **Data protection and information governance** - Arrangements and controls in place to ensure compliance with the DPA.
3. **Records and information management** - We will ensure that effective processes are in place to manage the Council’s records and information.

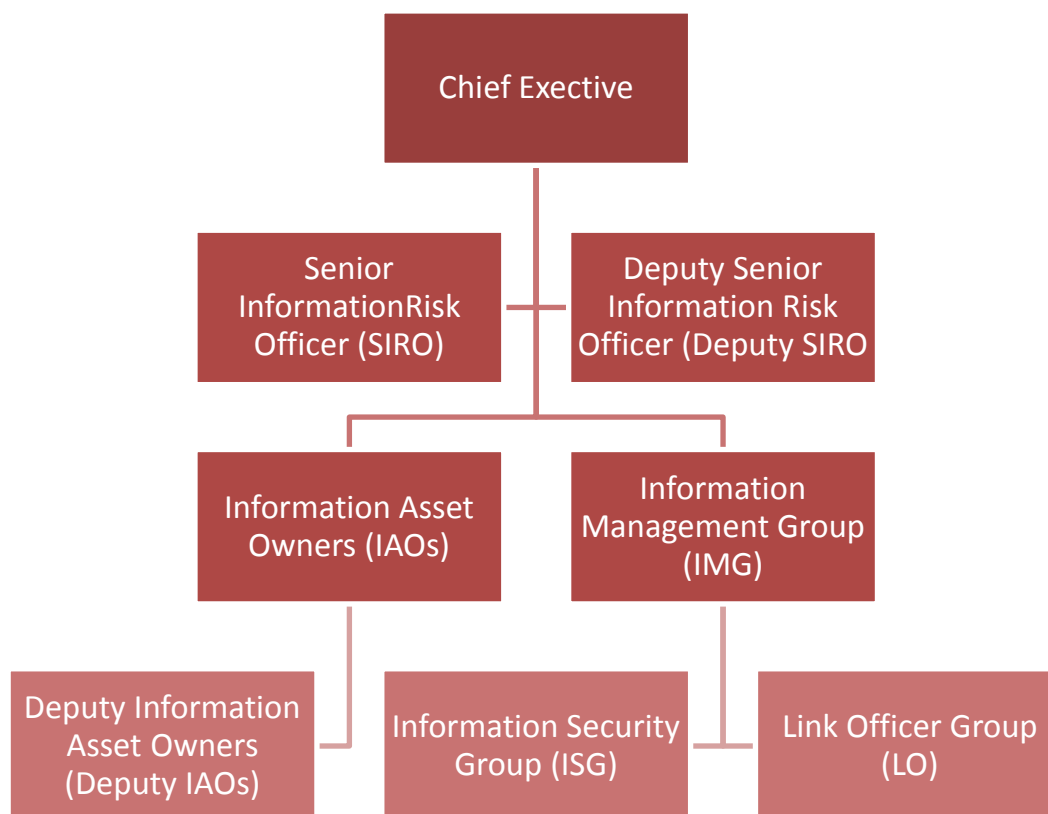
4. **Wales Accord on the Sharing of Personal Information (WASPI) obligations and data sharing** – The Council will ensure that the sharing of personal data complies with the principles of the DPA and the Information Commissioner’s Data Sharing Code of Practice.
5. **Information Security** – The Council will ensure that information security processes are in alignment with legislative requirements and the codes of practice which are appropriate, proportionate, measured and part of usual business. We will work with the business areas to ensure that the information security policy is aligned with operational requirements, finding solutions appropriate to the ICO’s risk appetite. We will support our staff by ensuring that information security policy and processes are clear and accessible and guidance is available when needed, and by providing appropriate training to minimise the risk of human error.
6. **Monitoring and assurance** – Monitor and develop a holistic enterprise approach to the management of information and data which allows the Council to deliver services throughout Wrexham using this information.

5. Reporting, monitoring and reviewing

Ownership of this strategy rests with Information Management Group which is responsible for agreeing, monitoring, promoting and reviewing its implementation.

An action plan has been developed to support this strategy, the key objectives of which will have been identified above. This will be monitored quarterly. Monitoring will also include annual Reports to the SLT, SMT and the SIRO and other departments where appropriate.

6. Information Management Roles



Chief Executive

The Chief Executive has overall corporate responsibility for Information Management.

Senior Information Risk Officer (SIRO) and the Deputy SIRO

The SIRO responsibility has been assigned to an Executive Director. The SIRO is also a member of the Strategic Leadership team and leads on Information Risk management for the Council. The Deputy SIRO, also the Monitoring Officer, assists the SIRO in the decision making process.

Information Management Group (IMG)

The IMG is chaired by the SIRO or the Deputy SIRO. The Aim of the Group is to have a corporate oversight and responsibility for information issues. The group meets every quarter (or more) to oversee the information management function.

Information Asset Owners

The Information Assets owners (IAOs) have the responsibility for the information lifecycle in their department. This includes a comprehensive list of all information sharing, information risks and information management within their department. The Head of each department is the nominated Information Asset Owner. The assets owners are supported by Deputy Information Asset Owners (Deputy IAOs) or the Senior Managers who will assist in delivering this function to the respective individual services.

Information Asset Administrators

The Information Asset Administrator's (IAA) primary role is to support the IAO to fulfil their responsibilities. IAAs will ensure that policies and procedures are followed, recognise actual or potential security incidents, consult with their IAO or the Corporate Information Manager on incident management and ensure that information asset registers are accurate and up to date.

Information Security Group

The key responsibility for the Information Security Group is to ensure that the Council has suitable measures in place for secure and effective handling of vital and sensitive information including personal information.

Link Officers

The Council's Information Link Officers (and the Deputy Information Link Officer in their absence) co-ordinate the department's responses to requests for information under 'Access to Information'. The Link Officers are responsible for co-ordinating the department's response to applications under the relevant information regime. The LOs are responsible for ensuring that the department's entries in the corporate publication scheme are appropriate and current.

Details of the roles and responsibilities have been outlined in the Information Management Framework and in the Terms of Reference of the relevant working Groups.

7. Document Hierarchy

