



Bromsgrove
District Council

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Information Management Strategy 2009/10

Department

E-Government & Customer Services

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Document Ref:

IM01

Document Version Number:

0.2

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1. Introduction

The purpose of this strategy is to set out an approach to improving information management.

Information is a key resource, it's value must be fully recognised and when properly managed it plays a crucial role in enabling services to be delivered at lower cost. Having the right information, available to the right people at the right time helps achieve business efficiency – people can find information they need quickly and avoid wasting time searching.

Poor information management poses great risks; recent news reports of information loss, theft and carelessness have caused great embarrassment to some public authorities - the cost in bad publicity and damage to customer confidence cannot be underestimated.

The current position

There has been good investment in technology and implementation of electronic systems as part of the modernising government agenda, but little attention has been paid to information retained in other formats e.g. paper records, microfilm, video and computer disks. In addition unstructured electronic information held within shared and personal folders is rarely reviewed. As a result a huge amount of information has been retained unnecessarily leaving the organisation open to the risk of non compliance of information law and placing a heavy burden on electronic servers

Services have been responsible for their own information; where services no longer operate as a result of restructuring or privatisation, records remain with no one responsible for them. Lists and finding aids are few; the knowledge of what lies in store rooms rests largely in people's heads - and when those people leave the knowledge goes with them but the records remain.

Paper records are stored in unsuitable locations. The Lower Chapel has been repeatedly identified as an area of concern by insurers and those responsible for health and safety. There is a real risk of injury caused by boxes poorly stacked, threats from vermin, infestation, fire, damp and flooding. In addition, while the store room is always locked when unattended, the Chapel is vulnerable to break in, theft and vandalism. There is a second large storage room at the Depot where records have been forgotten.

Legal and audit considerations

The Data Protection Act requires organisations that handle personal information to comply with a set of principles regarding privacy and security. The Act sets out the conditions for purposes of processing personal information and rights for data subjects. The Freedom of Information Act gives the right to request information (with exemptions) held by public authorities. The organisation can comply with these Acts only if recorded information is properly stored and accessible. The Information Commissioner has issued a code of practice for public authorities in line with Section 46 of the Freedom of Information Act on the practise they should follow for keeping, managing and destroying records.

In 2007 an Information Audit was commissioned at the request of BDC and undertaken by Worcestershire County Council. The audit provided a document retention and disposal schedule presenting a policy on how long information should be kept together with a high level report of findings including roles and responsibilities, information quality, security, access and storage. This strategy will set out actions that address some of the issues highlighted in the audit report.

Making Information Manageable

From 2005 – 2008 Worcestershire County Council embarked on a major project to improve the way information is managed at County level called 'Making Information Manageable' (MIM). The strategy uses many of the

elements of the MIM programme. By looking at how users respond to information created, used, retained and disposed of, we can make the necessary improvements to ensure that it is managed in the most effective way possible.

2. Defining Information Management

Information management is the function of managing the organisation's information resources. It includes creating, capturing, registering, classifying, indexing, storing, retrieving, accessing, securing, using, sharing and disposing of records. It also includes the development and embedding of methods of managing information, with full consideration to legal and regulatory compliance and the provision of services to internal and external customers based on information resources.

3. Our objectives

To know what information we hold

To only keep what information we need to keep

To know where to find information

To make information accessible to the right people while conforming to legislative and regulatory requirements.

4. Current strategy and policy influences

Strategy	Outcome	Information Management impact
The Council Plan	One of the Councils priorities is the delivery of Town Centre Regeneration. Part of this plan includes the relocation of the Council offices. It is proposed that a new Council office would be smaller than the current one with less storage room for paper based records.	The reduction and management of physical records will eliminate the need to provide space to accommodate them on a new site.
Data Quality Strategy	Consistent, high quality performance information is vital to support good decision making and improved service outcomes	Reinforced message that all staff have a responsibility for the quality of information.
ICT Security Policy	Requires users to help protect the security, confidentiality, possession, integrity and authenticity and availability of ICT facilities and information held on them.	Additional IM policies and procedures will reinforce the security of information
Government Connect (Code of Connection)	A pan-government programme providing an accredited and secure network between central government and every local authority in England and Wales	Additional IM policies and procedures will support CoCo compliance
GIS Strategy	Strategy to develop the Geographic Information System and the Local land and Property Gazetteer	Reviewing paper records could reveal spatial information suitable for inclusion on the Geographic Information System in the future.
Health and Safety policy and procedures	A safe workplace with safe access and egress. The provision of adequate health, safety and welfare facilities for securing a working environment, which is safe.	By clearing offices and store rooms of files that we are not required to keep, we can aim to provide a tidy and safe environment.
Shared Service agenda	Current consideration of joining services between Bromsgrove District and Redditch Borough Councils	Classifying information will enable the joining of information resources

5. Roles and information responsibilities

The following table outlines roles and responsibilities for Information Management:

Role	Responsibilities
Heads of Service	<ul style="list-style-type: none"> • have ultimate responsibility for records within their Service
Information Manager and team	<ul style="list-style-type: none"> • will lead an information management improvement programme, promote good practice and provide corporate benefits: policies, procedures, training and guidance. • take steps to maximise the council's compliance with information legislation
The Information Access Officer	<ul style="list-style-type: none"> • provides advice and support for monitoring requests for information (Freedom of Information and Subject Access requests): receiving, fielding, chasing and responding to requests and compiling performance data
The Information Management Group	<ul style="list-style-type: none"> • provide a means to embed information good practice • provide a platform to consider improvements and implementation
All BDC employees	<ul style="list-style-type: none"> • create and maintain records and manage information in relation to their role. <p>Note: Staff with specific responsibilities for records management in each service should have their responsibilities set out in their job descriptions</p>

6. Information Management Principles

The following principles were agreed by Worcestershire Information Management Task Group; membership is drawn from County and the six District and Borough Councils of Worcestershire:

- The Council will adopt a culture that promotes good information management practices.
- The electronic storage and transmission of information will be promoted where there is a clear benefit to improve efficiency.

Information will be:

- managed as a corporate resource, structured to facilitate information sharing
- accurate and up to date to support the council's operations and decision making process
- conform to legal and regulatory requirements, council guidelines and policies.
- captured and stored once only and reused. Where the duplication is unavoidable there will be a single authoritative source with measures in place to ensure consistency.
- made accessible to the right people. Confidentiality will be respected and restricted information protected.
- managed securely, ensuring the continuity of operations and minimising the possibility of damage to service provision by limiting the impact of security threats or incidents.
- routinely reviewed in accordance with the records retention and disposal schedule

7. Our legal obligations

Data Protection Act

The Data Protection Act sets out definitions, the principles and permitted purposes of data processing, the rights of data subjects and exemptions that apply.

Principles of the Act

The Data Protection Act requires all organisations that handle personal information to comply with eight important principles regarding privacy and disclosure.

Information must be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept longer than necessary
- Processed in line with your rights
- Secure
- Not transferred to other countries without adequate protection

Rights of Data Subjects

The Act sets out rights to data subjects:

- to find out what personal information is held on them (Subject Access Requests) and receive disclosed information within 40 days.
- to object to processing
- to stop direct marketing
- to understand a decision as a result of automated processing
- compensation in the event of loss due to data mishandling
- rectification of errors

Unauthorised obtaining, disclosing, non registering and ignoring enforcement are some of the criminal offences under the Act

All staff must be made aware of their responsibilities when handling personal information to help the organisation achieve compliance. This can only be achieved through routine training and updates.

Freedom of Information

The Freedom of Information Act 2000 gives a general right of access to all types of recorded information held by public authorities. When responding to requests, there are procedural requirements set out in the Act which an authority must follow. There are also valid reasons for withholding information, which are known as exemptions from the right to know. Information or a refusal notice must be provided within 20 working days.

The Act requires public authorities to have a 'Publication Scheme', a means of providing access to information which it proactively publishes. The Information Commissioner's Office introduced a model publication scheme that all public sector organisations should have adopted from 1 January 2009.

Authorities must produce a guide to the specific information they hold and which is contained within any of the scheme's seven classes. We have a duty to ensure that the information can be easily identified and accessed by the general public.

The existing publication scheme will be revised to conform to the Information Commissioner's guidelines.

Environmental Information Regulations 2004

These regulations give rights of access to environmental information held by public authorities. If we receive a request for environmental information we must respond within 20 working days.

Tracking requests for information

Requests for information are administered by the Information Access Officer using a paper system to track progress and provide an audit trail. A summary of each request is entered on Eshop to allow the responses to be shared across Hub partners. The system of tracking requests will be updated and streamlined to cope with the increasing number and complexity of requests.

We often receive requests for the same or similar information; if the information was available on the website we could respond swiftly by providing a link to the page. A review of previous requests will identify information that should be freely available on the website. This information will be made available unless one of the exemptions applies

Re use of Public Sector Information

The Re use of Public Sector Information Regulations (SI 2005/151) came into force on 1st July 2005. The regulations allow the public to request to reuse information. The regulations compliment FoI and EIR and allow the public to request to re-use information owned by the authority.

We are committed to allowing the re-use of our information, wherever possible and reasonable to do so, in order to support commercial growth and release the value of our information for the benefit of the economy as a whole.

The regulations provide a statutory framework through which the public can apply to reuse public sector information, based upon the principles of fairness, transparency, non discrimination and consistency of application.

We will adopt the framework and further seek accreditation under the Information Fair Trader Scheme (IFTS). The IFTS scheme sets out and assesses standards for public sector bodies and requires them to encourage re-use of information and achieve the minimum standards of fairness and transparency in relation to the re-use of its information.

8. Information sharing

In order to provide a more comprehensive service to the public, it is important that we and partner organisations work together to break down barriers to sharing information. This will assist in providing a seamless service to the public and provide more comprehensive information to staff. By agreeing to share information we can make better use of resources and skills by developing shared services with other Councils.

An information sharing agreement or protocol must be in place before information can be shared. The protocol will outline roles and responsibilities for information and set out steps to address security and ensure the integrity and quality of information is maintained

A toolkit will be developed and provided on the intranet to assist in the development of protocols.

9. Document retention and disposal policy

A records retention and disposal schedule, compiled during the information audit, provides a comprehensive policy for each record class: the length of time it needs to be kept, why it needs to be kept and how it should be

disposed. The schedule is available to staff via the intranet; it is a living document and will need to be updated to keep pace legislation and operational changes.

We will raise awareness of the schedule and encourage teams to use it. Information that does not need to be kept will be disposed of.

The term 'disposal' does not necessarily mean destroy. Information of historical interest will be offered to the County Record Office for permanent preservation. Consultation with organisations with current responsibility for functions will be undertaken and where appropriate records can be offered for transfer. Personal information will be eliminated prior to transfer.

10. Data Quality

The quality of information is a critical element of information Management as a whole. Until now data quality has focused on performance data but good management decisions can only be made with confidence with the assurance of quality, up to date, accurate and easily retrievable information.

File Classification

We will work with staff to agree and adopt a file classification. By using functional titles, information will be structured to create an improved environment for information storage and retrieval. This will facilitate information sharing between organisations and help support the shared service agenda.

File naming conventions

File naming conventions ensure that all records are consistently named with meaningful titles. Teams that agree rules on files titles will save time wasted searching through file contents to find the information they need. Guidance will be provided on file naming conventions.

Duplication tests

Information should be captured once and used many times to maintain quality. A routine duplication test will provide a measure for managers to monitor improvement and ensure duplication remains in check.

11. Review of this strategy

Approval

The strategy, amendments and additions must be approved by the Head of E-Government and Customer Services

Frequency

The strategy will be continually subject to review and checked against current working practices, legislative and changed if necessary. The Information Manager will be responsible for ensuring that the working practices and processes in the strategy are still relevant to the Council, in keeping with it's policies. It will be subject to a formal review in September 2010.

Retention and Audit trail

At a minimum the original document and the previous version of the Strategy will be preserved as a check for previous decisions and comparison purposes.

12. Action Plan

No.	Key Objective	Key Activity	Action detail	Priority	Status	Target date
1	Establishing the information management function	Establish an Information Management Group	<ul style="list-style-type: none"> Establish an Information Management Group with regular meetings cycle 	H	In progress	Oct 2009
		Develop and implement an Information Management Strategy and policies	<ul style="list-style-type: none"> Gain strategy approval 	H	In progress	Oct 2009
			<ul style="list-style-type: none"> Information Access Policy 	H	In progress	Dec 2009
		Business planning	<ul style="list-style-type: none"> Place Information Management as part of the business planning process in all services 	H	Not started	Oct 2009
2	Fulfilling our Legal Obligations	Review the Publication Scheme to comply with Information Commissioner's Office guidelines and create an easy to access model for the customer	<ul style="list-style-type: none"> Work to improve the new Publication Scheme on the website when the new Immediacy content management system goes live 	H	Not started	Jan 2010.
		Create a framework for Re-use of Public Sector Information	<ul style="list-style-type: none"> Seek OPSI Fair Trader accreditation 	L	In progress	March 2010
		Develop a framework to audit manual and	<ul style="list-style-type: none"> Develop a toolkit and make available on the intranet 	M	Not started	Sept 2010

No.	Key Objective	Key Activity	Action detail	Priority	Status	Target date	
		electronic systems for Data Protection compliance	<ul style="list-style-type: none"> Start a routine audit cycle 	L	Not started		
			<ul style="list-style-type: none"> Check Data Processing Notices on forms that capture personal information for compliance to kick start audit process 	M	Not started		
		Maintain staff awareness of our obligations	<ul style="list-style-type: none"> Prepare module and deliver training for staff on information legislation 	H	In progress		Dec 2009
			<ul style="list-style-type: none"> Update training material e.g. induction pack, posters. 	H	In progress		Oct 2009
3	Keeping what we need to keep	Implement the Retention and Disposal Schedule	<ul style="list-style-type: none"> Gain support and action to remove redundant equipment and general items to allow access to files 	H	In progress	From Jan 2009 completion by May 2010	
			<ul style="list-style-type: none"> Launch file review and disposal programme 	H	In progress		
		Unlock 'lost' information.	<ul style="list-style-type: none"> Identify records of historical interest that do not need to be kept and offer to County Record Office 	M	In progress		
			<ul style="list-style-type: none"> Identify records for future capture into electronic systems 	L	In progress		
			<ul style="list-style-type: none"> Consult with current responsibility for BDC past functions before records disposal. Offer for transfer if appropriate to do so. 	L	In progress		
		Review storage	<ul style="list-style-type: none"> Explore alternative storage 	L	Not started		Mar 2011

No.	Key Objective	Key Activity	Action detail	Priority	Status	Target date
		facilities for physical records	options for physical records			
4	Improving knowledge – knowing what we hold	Develop an Information Database	<ul style="list-style-type: none"> Further develop the Document Retention and Disposal Schedule to provide knowledge source on records held 	M	Not started	Oct 2010
5	Improving Efficiency	Investigate and implement a new system for tracking information access requests	<ul style="list-style-type: none"> Investigate and consider alternative systems 	M	In progress	Oct 2009
			<ul style="list-style-type: none"> Implement a new system 	M	Not started	Dec 2009
6	Improving access to information	Review Information available on the website	<ul style="list-style-type: none"> Examine previous requests for information to identify classes of information that should be available on the website 	M	Not started	Aug 2010
			<ul style="list-style-type: none"> Use the ICO's model publication scheme to identify classes of information that should be freely available 	M	Not started	
			<ul style="list-style-type: none"> Create an information Asset Register of unpublished information available to the public when requested 	M	Not started	
			<ul style="list-style-type: none"> Work with teams and ICT to make identified classes of information available on the website 	M	Not started	
		Review pages on the intranet	<ul style="list-style-type: none"> Work with teams to make greater use of the intranet. Ensure 	L	Not started	Dec 2010

No.	Key Objective	Key Activity	Action detail	Priority	Status	Target date
			information is up to date			
7	Improving Data Quality	Implement Corporate file plan	<ul style="list-style-type: none"> Work with teams to develop a file plan using functional titles and agreed naming conventions 	H	In progress	Sept 2010
			<ul style="list-style-type: none"> Review use of the corporate share (T drive) identify folders for deletion 	M	In progress	
			<ul style="list-style-type: none"> Liaise with ICT towards providing an improved web based file store environment 	L	Not started	
		Eliminate unnecessary duplication	<ul style="list-style-type: none"> Run duplication tests across electronic files and folders 	M	Not started	
			<ul style="list-style-type: none"> Provide report to teams and monitor progress 	M	Not started	
8	Providing the tools	Publish guidelines on good practice and standards	<ul style="list-style-type: none"> Develop a Making Information Manageable Intranet site 	H	In progress	Apr 2010
		Develop Information Sharing Toolkit	<ul style="list-style-type: none"> Provide protocols and guidance on Information Sharing 	H	In progress	Sept 2009
9	Improving information security	Improve information security	<ul style="list-style-type: none"> Remind all staff of their obligations to keep information secure 	M	Not started	Apr 2010
10	Looking to the future	Explore a joint Information Management Service with Redditch Borough Council	<ul style="list-style-type: none"> Maintain communication with those with information management responsibilities at RBC 	M	In progress	ongoing