Appendix A

DRAFT

Leeds City Council
Information Governance Framework

Section 4

The Information Governance Framework

THE INFORMATION GOVERNANCE FRAMEWORK

4.1 The Framework

4.1.1 The Information Governance Framework provides the intellectual architecture which governs how Leeds City Council captures, creates, accesses, secures, manages and shares its information both internally and externally.

4.1.2 The Leeds Framework has been developed based on best practice models adopted nationally. These include the NHS Information Governance Toolkit and the draft Local Government Information Governance Toolkit. Further development of these models within the context of Leeds has also be aided through a similar exercise being conducted on a West Yorkshire basis through the West Yorkshire Information Management Forum.

4.1.3 The Framework is structured around 6 areas of Information Governance as follows:
- Information Governance Management
- Records Management
- Information Compliance
- Information Security
- Data Quality & Assurance
- Information Sharing

4.1.4 Details on each of the six areas are outlined below. For each, a rationale as to why it is a key competent of the Framework is provided, this is followed by the objectives that are sought through delivery of the Framework and the supporting policies and procedures that will enable the framework to become real within the organisation.

4.2 Information Governance Management

Rationale for Information Governance Management

4.2.1 This covers the management of information governance at a corporate, managerial and operational level across the organisation. It is one of the fundamental component of the Framework as it will provide the necessary ownership and advocacy functions that can be used to ensure the promotion, development and implementation of the appropriate information governance infrastructure is delivered across the organisation.

Objectives for Information Governance Management

4.2.2 The following outline the required objectives to ensure delivery of an appropriate Information Governance Management function:

REF	Objective
IMG 1	Leeds City Council has a formally recognised corporate Information Governance Group with agreed Terms of Reference. The Group should sit in an appropriate place within the broader Corporate Governance arrangements
IMG 2	The Information Governance Group has access to the necessary expertise across all six areas of the Framework
IMG 3	Leeds City Council has an approved Information Governance Framework
IMG 4	Leeds City Council has an approved Information Governance Statement
IMG 5	Leeds City Council has an approved Information Management Policy

IMG 6	There are clearly defined corporate and managerial stewardship responsibilities for information governance across Leeds City Council.
IMG 7	Leeds City Council has an approved corporate information governance improvement plan that is managed and monitored by the information governance group
IMG 8	An established review process exists to maintain the currency of the Information Governance Framework within the Council.
IMG 9	Staff induction procedures across the Council effectively raise the awareness of information governance and outline individual responsibilities contained therein.
IMG 10	Core information governance competencies are built into all Job Descriptions and an appropriate Training and Development programme established to facilitate their delivery.

Policies and Procedures in support of Information Governance Management

4.2.3   The following policies and procedures are required within Leeds City Council to ensure delivery of the 10 Information Governance Management objectives outlined above.

- Corporate Information Governance Group Terms of Reference
- Leeds City Council Information Governance Framework
- Information Governance Framework – Policy Review Procedure
- Leeds City Council Information Governance Statement
- Leeds City Council Information Management Policy
- Corporate Information Governance Improvement Plan (3 yearly)
- Information Governance Stewardship and Accountability Framework
- Information Governance Skills and Competency Framework
- Information Governance Workforce Development Plan
- Information Governance Training and Development Programme.
- Information Governance Induction procedure
- Information Governance – staff guidance manual

4.3   Records Management

Rationale for Records Management

4.3.1   Records Management covers the process of creating, describing, using, storing, archiving and disposing of organisational records according to a defined set of standards (usually adherence to ISO 15489). It is one of the fundamental components of the Information Governance Framework as it ensures the Council's record sets enable adherence to compliance rules and statutory access requirements as well as protecting an organisation's corporate memory for re-use.

Objectives for Records Management

4.3.2   The following outline the required objectives to ensure delivery of an appropriate Records Management function:

REF	Objective
RM 1	Leeds City Council has an agreed ISO 15489 compliant Records Management policy.
RM 2	Leeds City Council has agreed and implemented a Business Classification Scheme which incorporates security (access and permission) rules.
RM 3	Leeds City Council has agreed and implemented a Record Retention and Disposition Policy

RM 4	Leeds City Council has agreed and embedded corporate records management metadata standards which meet national standards as a minimum.
RM 5	Leeds City Council has agreed and implemented a Version Control Policy
RM 6	Leeds City Council has agreed and implemented a Security & Access Policy
RM 7	An established review procedure exists to protect the currency of the Records Management Policy within the Council
RM 8	Leeds City Council has documented procedures to ensure delivery of the Records Management policy. As a minimum, these should cover: • Storage and Handling • Preservation and Future-proofing • Audit and Tracking • Business Continuity • Legal Admissibility • Access and Retrieval
RM 9	Leeds City Council has deployed appropriate systems to manage the organisation's records in line with the corporate Records Management policy.
RM 10	A Controlled Business Vocabulary (or taxonomy) is developed and embedded within electronic document and records management to maintain the link between business usability and the Business Classification Scheme
RM 11	Leeds City Council has a Records Management function that has the required capacity to develop, implement and embed the Records Management policy across the organisation
RM 12	Core Records Management competencies are built into appropriate Job Descriptions and a suitable Training and Development programme established to facilitate their delivery.

Policies and Procedures in support of Records Management

4.3.3   Further to those established for Information Governance Management, the following policies and procedures are required within Leeds City Council to ensure delivery of the 12 Records Management objectives outlined above.

- Corporate Records Management Policy
- Business Classification Scheme
- Records Retention and Disposition Policy
- Corporate Records Management Metadata Standards
- Document Version Control Policy
- Records Security and Access Policy
- Storage and Handling Procedure
- Preservation and Future-Proofing Procedure
- Audit and Tracking Procedure
- Business Continuity Procedure
- Legal Admissibility Procedure
- Access and Retrieval Procedure
- Controlled Business Vocabulary

4.4   Information Compliance

Rationale for Information Compliance

4.4.1   Compliance covers the legal framework and the standards that need to be established to ensure

information management is within the law. The Council manages and processes large volumes of confidential and sensitive information and knowledge about people. It must deal with this lawfully and ethically. Failure to do so could endanger individuals and can also increase risk, loss of reputation and litigation. The key legislation it must comply with includes the Data Protection Act, the Freedom of Information Act, the Human Rights Act, the Environmental Information Regulations and Re-Use of Public Sector Information Regulations.

Objectives for Information Compliance

4.4.1   The following outline the required objectives to ensure delivery of an appropriate Information Compliance function:

REF	Objective
	INFORMATION RIGHTS (Includes DPA/FOI/EIR/RIPA/PIR etc)
IC 1	Leeds City Council has an approved and monitored Access to Information policy which sets out corporate procedures, roles and responsibilities.
IC 2	Directorates will make sure that they have appointed dedicated officers who are responsible for managing and processing Access to Information requests. All such officers will have access to regular training on information rights legislation.
IC 3	Leeds City Council has a corporate framework for evaluating the public interest test for disclosing information through Access to Information requests in a consistent and transparent manner.
IC 4	All staff employed by Leeds City Council are aware and trained in the various rights of access to information and how these can be exercised inclusively.
IC 5	The public are made aware of their information rights and how to exercise them.
IC 6	Staff ensure that information is provided in the most appropriately accessible format within statutory timescales.
IC 7	Leeds City Council has an effective mechanism in place to consider appeals to withhold information under both FOI and EIR requests.
IC 8	Leeds City Council has a standard licence agreement to issue to external parties requesting information for further use under the Re-Use of Public Sector Information Regulations. The Information and Knowledge Management Team will maintain a register of information assets and audit compliance.
	STANDARDS
IC 8	Personal information is processed in a manner compliant with the Data Protection Principles.
IC 9	Intellectual property rights (e.g. copyright) are observed.
IC 10	All staff are made aware of and abide by their obligations under the Common Law Duty of Confidentiality.

Policies and procedures in Support of Information Compliance

4.4.2   Further to those established for Information Governance Management, the following policies and procedures are required within Leeds City Council to ensure delivery of the 10 Information Compliance objectives outlined above.

- Data Protection Policy
- Staff guidance to Data Protection
- Guidance and procedure to disclosures

- Guidance and procedure to subject access requests
- Public guide to subject access requests
- Freedom of Information Policy
- Staff guidance to Freedom of Information
- Guidance and procedure to disclosure and exempted information
- Procurement guidance
- FOI guidance for Members
- Environmental Information Regulations Policy
- Staff guidance to EIR
- Policy document on the Re-Use of Public Sector Information Regulations
- Regulation of Investigatory Powers Policy
- Staff guidance on RIPA
- Covert Surveillance Code of Practice

4.5   Information Security

Rationale for Information Security

4.5.1   Information security covers the policies and procedures in place to protect information and information systems from unauthorized access, use, disclosure, disruption, modification, or destruction. Adherence to the principles of ISO 270001 will deliver information security compliance. It is one of the fundamental components of the Information Governance Framework as it will ensure the Council is able to protect the confidentiality, integrity and availability of information within the organisation and when sharing with partners.

Objectives for Information Security

4.5.2   The following outline the required objectives to ensure delivery of an appropriate Information Security function:

REF	Objective
IS 1	There is an Information Security Policy in place based on ISO 270001
IS 2	Roles and responsibilities for adherence to the policy are clearly defined and an appropriate training and development programme is in place.
IS 3	There is an inventory of information assets, as defined in ISO 270001, supported by a Protective Marking Scheme
IS 4	Access control is in line with the security policy and the need for information dissemination and authorisation
IS 5	There is a Risk Management Framework in place and information security risks are incorporated.
IS 6	Security requirements are included in formal system acquisition, development and maintenance procedures
IS 7	Formal procedures are in place to avoid breaches of the law, statutory, regulatory or contractual obligations, and of any security requirements.
IS 8	There are procedures to report information security incidents and weaknesses and to escalate action on dealing with these. Staff are made fully aware of the procedures.
IS 9	There is a business continuity management process designed to limit the impact of, and recover from the loss of information assets.
IS 10	Operation procedures for the use of equipment is available to all users who need them. The procedures are documented and maintained.

IS 11	All changes to information processes are planned and implementation is effectively managed.
IS 12	There are controls in place for managing Third Party agreements
IS 13	There are appropriate physical security controls in place to protect information assets
IS 14	Networks are adequately managed and controlled to protect them from threats. Security is provided for the systems and applications using the network
IS 15	Information Security Management procedures are independently reviewed

Policies and Procedures in support of Information Security

4.5.3   Further to those established for Information Governance Management, the following policies and procedures are required within Leeds City Council to ensure delivery of the 15 Information Security objectives outlined above.

- Information Security Policy
- Information Security Manual/Staff Guidance
- Access and Permissions Security Policy
- Security of Third Party Access Policy
- E-Mail Code of Practice
- Internet Usage Policy
- Information Security Classification
- Anti-Virus Policy
- Code of Practice for Information Security Management
- Code of Conduct for the use of Software
- Code of Conduct for the use of IT Systems
- Code of Conduct for Mobile and Remote Working
- Code of Conduct for Systems Administrators

4.6   Data Quality and Assurance

Rationale for Data Quality Assurance

4.6.1   This set of requirements covers the need to ensure the quality, accuracy, currency and other characteristics of information products. It is one of the fundamental components of the Information Governance Framework as both staff and customers will be able to trust the validity and authority of information sources, and have confidence that it is up-to-date and accurate. It is important that the Council is able to measure the level of quality of its information resources and ensure they comply with relevant standards.

Objectives for Data Quality Assurance

4.6.2   The following outline the required objectives to ensure delivery of an appropriate Data Quality Assurance function.

REF	Objective
DQA 1	Leeds City Council has an agreed Data Quality Strategy and Policy.
DQA 2	Leeds City Council has a designated Data Quality Champion at executive level.
DQA 3	There are designated Data Stewardship roles with specific responsibility for data quality across the Council.

DQA 4	Data quality competencies are built into all job descriptions. Where colleagues have specific responsibilities around data, suitable training and development programmes are developed.
DQA 5	There are business continuity plans in place for all systems.
DQA 6	Minimum standards are set for the quality of data being shared with external organisations and there are standards for data quality applied to data being provided to the Council.
DQA 7	There are documented procedures and processes in place governing the capturing, recording and handling of data.
DQA 8	There are documented procedures for data collection activities and these procedures are monitored.
DQA 9	Data quality checks are incorporated into processes and procedures around the handling of data.
DQA 10	Leeds City Council has a set of metrics which can be used to assess the quality of data in key systems.
DQA 11	There are documented standards for the Council's data items to provide consistency across the systems and in reporting. Where national standards around data are not available local standards will be agreed.
DQA 12	Leeds City Council has a framework to enable the continuous assessment and regular monitoring of data quality.
DQA 13	Leeds City Council uses the appropriate technologies to support its data quality improvement activities.

Policies & Procedures and in support of Data Quality Assurance

4.6.3 Further to those established for Information Governance Management, the following policies and procedures are required within Leeds City Council to ensure delivery of the 13 Data Quality Assurance objectives outlined above:

- Data Quality Strategy
- Data Governance Strategy
- Data Quality Policy
- Leeds City Council Data Standards
- Data Sharing Policy
- Master Data Management Strategy
- Data Integration Policy
- Records Retention and Disposition Policy
- Business Continuity Procedure
- Information Security Policy
- Access and Permissions Security Policy
- Leeds City Council Information Sharing Protocol

4.7   Information Sharing

Rationale for Information Sharing

4.7.1 Information sharing covers the proper governance of information sharing practice across the Council; it is an essential component given that it deals with business activities involving the potential for sharing personal information about our customers, staff and other stakeholders. Ensuring that our practice is of the highest standard, meeting with regulatory mechanisms such as the Data Protection

and Human Rights Acts together with the Common Law Duty of Confidentiality, is essential in order to imbue confidence amongst those whose personal information is involved in such business processes.

Objectives for Information Sharing

4.7.2 The following outline the required objectives to ensure delivery of an appropriate Information Sharing function.

REF	Objective
ISG1	There is an agreed information sharing protocol in place setting out principles, operational procedures and key legislative considerations together with practical user guidance on the following: • Obtaining consent to share (including establishing fitness to consent); • Sharing without consent; • Access and security purposes; • Use of additional purposes; • Determining the "need to know"; • Completion of template information sharing agreements; and • Application of key legislative considerations.
ISG 2	Leeds City Council has a standardised, documented approach to information sharing in place and full use is being made of template guidance.
ISG 3	All information sharing agreements are completed in full detail setting out in particular the legal justification for each sharing exercise.
ISG 4	Each Directorate has a nominated trained practitioner available to give guidance on key legal issues in relation to justification for information sharing.
ISG 5	Each Directorate has an audit log of its information sharing agreements, recording sufficient detail of each exchange with particular regard to purpose, justification, nominated contacts and review period.
ISG 6	All information sharing agreements are centrally logged with the Information and Knowledge Management Team.
ISG 7	All information sharing agreements are reviewed in the month prior to expiration to ensure continued validity.
ISG 8	A mechanism for reporting breaches of the protocol and/or specific agreements is documented, agreed and in place for both internal and external parties.
ISG 9	A mechanism for monitoring the operation and effectiveness of the protocol is documented, agreed and in place.
ISG 10	Directorates will, on request, provide assurances that agreed procedures and practice are being followed.
ISG 11	Operation of the Information Sharing Protocol is included as a standing item on the agenda of the Information Governance Group in order to address on a regular basis any issues that may arise.
ISG 12	All nominated practitioners are properly trained and equipped in order to provide effective advice and guidance.
ISG 13	A training package is developed and in place for all staff involved in day to day information sharing.

ISG 14	An outline of the protocol and operational procedures is included in the staff induction process.

Policies & Procedures in support of Information Sharing

4.7.3   Further to those established for Information Governance Management, the following policies and procedures are required within Leeds City Council to ensure delivery of the 14 Information Sharing objectives outlined above:

- Leeds City Council Information Sharing Protocol
- Information Sharing Protocol – review procedure
- Corporate Operational Procedures for Sharing Information; (comprising):
    - *Procedures for sharing information*
    - *Access and security procedures*
    - *Procedure for management and review of the protocol*
- Corporate Information Sharing Agreement Template
- Procedure for logging information sharing agreements within the organisation and Directorates
- Breach Rectification Procedure
- Training for practitioners on legal considerations
- Guidance manual for operational staff