

# **Information Governance in the North East Benchmarking Report**

## Document Control

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<b>Author</b>	Danny Budzak
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## Contact Details

Danny Budzak  
[danny@beingdigital.co.uk](mailto:danny@beingdigital.co.uk)

07866 463486

The Information Design Company Ltd

## **1 Introduction - Information Governance Benchmarking**

This report outlines the research into information governance across the north east region of England in 2008. The benchmarking took the form of three workshops, a number of face to face interviews and group meetings in a number of councils. There were also a number of informal discussions and conversations that helped provide more context and a wider overview, including telephone interviews with councils.

In addition, a number of presentations were given to specific working groups within councils - for example at Durham and at Gateshead - and this helped provide yet more information, this time from a more operational perspective.

Face to face interviews included Darlington, Durham City, Easington, Sedgefield, Middlesbrough, Redcar and Cleveland and Tynedale.

The various workshops included representatives from all of the councils in Durham, Northumberland and Cleveland.

The main participants in the benchmarking were local authorities, but there was also some input and work done with Fire and Rescue Services and the Northumberland National Park. As the profile of the work was raised, some private sector organisations expressed interest. These were kept out of the scope of the project although some informal discussions took place.

The organisations that participated included:

Alnwick  
Berwick upon Tweed District Council  
Castle Morpeth  
Chester-le-Street District Council  
Darlington Borough Council  
Durham City Council  
Durham County Council  
Easington District Council  
Gateshead Metropolitan Borough Council  
Hartlepool Borough Council  
Northumberland County Council  
Northumberland National Park Authority  
Middlesbrough Council  
Newcastle City Council  
North Tyneside Metropolitan Borough Council  
Redcar and Cleveland Borough Council  
Sedgefield  
South Tyneside Metropolitan Borough Council  
Stockton on Tees Borough Council  
Sunderland City Council  
Teesdale District Council  
Tyne and Wear Fire and Rescue Service  
Tynedale District Council  
Wear Valley  
Wansbeck District Council

In addition, there was input from North East Connects, the University of Newcastle, the University of Northumbria and the Information Commissioners Office.

For the face to face interviews, a questionnaire was created based on the Information Governance Toolkit, originally created by the Local eGovernment Standards Body (LeGSB). At least one of the organisations that took part in an interview had used the full version of the toolkit to benchmark themselves. One of the councils that took part in this benchmarking had been very involved in the development of the toolkit itself.

Almost all the people who attended the workshops or took part in interviews or filled in forms were people with some role and responsibility for information management or information governance. This means they had an understanding of the basic concepts, the drivers and the benefits. The benchmarking did not specifically engage with front line members of staff or senior officers with general managerial functions. It would have been useful, and would be useful in future work, to engage with a wider layer of people within the organisation to discover what they know and think about information governance in the organisation.

Feedback from the workshops themselves showed a very level of satisfaction with the format and content and the comments received indicated that people found them both very useful and would like to see more in the future.

## **2 Defining Information Governance**

For the purpose of the benchmarking exercise, information governance was defined as:

### **The Management of Information Governance**

The management of information governance is about how roles, responsibilities are defined, about what functions there are, and where they are in the organisation. It is about the policy and strategy framework and what level of senior and managerial support and understanding there is.

### **Information Security**

Information security was defined in the wider sense of both technologies and people.

### **Compliance**

Compliance was defined in relation to legislation - for example compliance with the Data Protection Act and the Freedom of Information Act. It was also defined as compliance with the existing policies and procedures of the organisation itself.

### **Data Quality**

This was defined as being a set of standards against which the quality of data could be measured and defined.

### **Records Management**

Records management was defined as how records were defined and managed and what archiving, retention and disposal policies there might be.

In general, people within the organisations understood and accepted these definitions. However, at some of the workshops, people came along who by their own admission were new to information governance and found this structure and the definitions helpful in their own right.

### **3 Drivers for Information Governance**

Organisations were asked what they thought the drivers for information governance are. This was done through the interviews and the workshops. The following drivers were all identified:

#### **Legal Compliance**

There were several comments that FOI (Freedom of Information) had made a significant difference to the understanding for records management and of the need to be able to find relevant information. This had other effects, such as helping to establish an understanding of the need for file plans and retention schedules.

It was clear that all of the organisations work hard to ensure compliance with the two areas of compliance - FOI and data protection.

All of the organisations were dealing with FOI requests and data protection subject access requests.

#### **Security**

During this piece of work, two CDs from HMRC (Revenue and Customs) infamously went missing. This had a fairly galvanising impact on some organisations, particularly as the data loss was from an office in the north east.

People also mentioned the various ongoing high profiles in the media where poor information governance had led to risk and harm to people. Due to the profile of these cases, there is generally a high awareness.

#### **Need for Accurate Data and Information**

People saw the need for accurate data and information from both a strategic and operational perspective. Decisions cannot be made without good information, and service delivery is dependant on good information; good information needs good governance.

#### **Reducing Costs and Proving Return on Investment**

People were aware that it can be difficult to prove the financial benefits of large information systems and whether technologies can actually reduce overall costs (particularly when the whole spend is of ICT projects is taken into account). However people felt that without good information governance, this would be almost impossible to do. There was an awareness that as a minimum, there is a need to understand how improved information governance can help reduce costs, maximise the benefits of particular systems (for example Electronic Document and Records Management Systems) and help increase return on investment.

#### **Meeting Increased Customer Expectations**

People who participated in the benchmarking suggested that customer expectations are increasing, and with the use of systems such as email, people can tend to expect instant answers.

The development of digital information systems has increased the speed and range of ways in which organisations and customers interact and this means that information governance must help with joining up of records, protection of personal data and the delivery of joined up services.

#### **Open and Transparent Government**

People were aware of the political dimensions of improved information governance, in particular of the way in which FOI can support open and transparent government. It was clear that many organisations don't just 'do' FOI because it's the law; they genuinely want to

improve the democratic process.

### **More and More Data is Being Held About People**

The increased collection of data and the increased number of line of business applications that use that data has made many service managers and information professionals acutely aware of the need for robust information governance frameworks.

### **Reduction of Risk**

The reduction of risk was cited by participants as a driver, although there were mixed views as to how this was perceived across the organisation, including by the senior managers.

### **Avoidance of Unnecessary Costs**

In those organisations where there had been data losses, there was an appreciation of the costs and loss of productivity that this can incur.

## **4 What are the Benefits of Information Governance?**

This question was explored in both the interviews and workshop settings. There was a general understanding that benefits could be delivered by information governance, but there was less clarity as to how this might be done. There was also a feeling among some people that it would take a lot of work and effort to convince the whole organisation - or even the key players in the organisation - of the benefits.

### **Reducing Risk**

The information professionals and those knowledge workers dealing with large amounts of data, or with sensitive personal data were well aware of how information governance can reduce risk.

### **Meeting Compliance Requirements**

Staff felt assured that they could answer Freedom of Information and Data Protection requests and that there was an understanding of these issues across the organisation.

### **Increase Staff Confidence**

People felt that where information governance was managed well, it gave staff confidence in a range of areas. For example, they felt more able to share data and information, they felt information was more secure and they felt more confident that information they would provide to customers would be more accurate. People commented that this made staff more in control of their work and work environment and this was generally a good thing.

### **Better Understanding and Control of the Technologies**

People said that it made it easier to understand how to appropriate technologies into the organisation; for example mobile devices, where there was a better understanding of information governance.

### **Better Service Delivery**

It was generally perceived that information supports service delivery and that good information management and good information governance will deliver better services. Even though it might be difficult to quantify some of this, people felt that intuitively this makes sense.

## **5 Management of Information Governance**

### **Comments from Interviews and Workshops**

*"Information governance doesn't have a natural home in the organisation"*

*"The organisation of information governance is ad hoc"*

*"A policy was produced but it became shelf ware - it didn't really go anywhere"*

*"The term 'information governance' is perhaps not recognised within the department. However, what is firmly embedded, particularly with social care staff, is the acknowledgement that robust records need to be maintained and managed. There is also a high awareness of data protection and Caldicott Guardian requirements under the information governance umbrella".*

*"There is an assumption that everyone is working from the same document...but they're not necessarily"*

*"There is a need to define what a policy is, and what a strategy is"*

*"I'm not aware of what policies there are in the council".*

*"Information governance shouldn't sit in ICT"*

*"There is only one person in senior management who has any interest. The other service heads are aware that information governance is important, but they see it from their own department - this reflects a very silo attitude".*

*"They (senior management) perceive the risk is low"*

*"Unless central government says do it (information governance) it will be very low on the corporate agenda"*

*"There has always been an idea that information governance is a 'good thing', but the organisation is not sure how to go forward".*

*"Information governance needs to be embedded everywhere"*

*"There needs to be driven within groups across the council - there needs to be champions within the departments - but to do this, we need to find the person that can be the effective champion or advocate for information governance".*

*"We think there is a group, but it doesn't have much of a profile"*

*"Don't think the staff have a very good understanding - or not sure that the staff really care about the issues"*

*"There is a real need to demonstrate the business benefits".*

### **General and Collate Points from Interviews and Workshops**

- There is a core group of around 20% of the councils in the region who have strong policies, senior management support and are in control of the information governance across the organisation. Even within this group however, there is a clear recognition of what can be improved
- It was within this core group that the best overall management of information governance exists, for example, there is a corporate information management group.

- There is a corporate understanding of information governance in the core group of councils. In other organisations there are pockets of understanding, or there is understanding about information security, but less about records management of data quality
- In general, compliance and security are the best understood aspects of information governance
- Information governance functions in some organisations are very clear. There are designated responsibilities for data protection, freedom of information; there are information managers and records managers. In other organisations, particularly the smaller councils, the information governance functions were sometimes all within one person who had the role of dealing with FOI, DPA, information security and much else besides
- In one organisation the Chief Executive had given their support for an information audit - this had made a big difference in raising the whole issue across the organisation
- However, the use of information audits to assess what information the organisation has, how it is being used, and what the information governance issues are has not really been attempted in most of the organisations
- The support provided by senior management varied considerably; in some councils it was very good, and therefore not surprising that they were the best organised, understood the issues and could demonstrate that they were managing the risks
- In some councils there was a high degree of co-operation, particularly in areas such as social services; in others, there was a much more fragmented and silo approach
- There is such a range of roles, responsibilities and groups that it is difficult to try and compare like with like between different organisations
- Induction and training are inconsistent both across the region and within individual councils
- In at least one council, a breakdown in a relationship with a strategic partner had caused a lot of problems
- There is a wide variety of policies and these are enforced to very different degrees
- In some cases, information governance was organised through an information security group
- Organisations have had mixed and varying fortunes in being able to establish groups and maintain interest in their activities and meeting
- Organisations had tried different ways to deal with the issues; for example, approaching the whole of information governance through information security, and using this as the main driver to try and leverage interest at a more general level
- Few of the organisations in the region would define themselves as having a 'set of standards' regarding information governance
- Some organisations have a lot of policies, but not an overarching information management and governance one
- There is some confusion as to what the difference between information management and information governance are
- In one organisation an information manager post was specifically created to provide a more strategic overview and to realise the benefits, rather than an operational post

## **6 Information Security**

### **Comments from Interviews and Workshops**

*"One of the biggest problems is human"*

*"Laptops are secure, but paper case notes in a car are not"*

*"There is a one page information security policy but it has not yet been approved"*

*"Using the controls from ISO 17799. The policy is to adhere to the standard so that we don't have to keep updating at a local level. The full standard is made available to everyone in the council who is interested. What we really need to do is take the key parts of the ISO and turn it into a user guide; turn it into manageable parts that people could absorb and apply to their day to day work".*

*"The council recognises the functions of information management, information security, freedom of information and data protection; it would make sense to bring them altogether in one place"*

*"Most people in the organisation concentrate on the information security aspect of this"*

*"At a corporate level the performance team are responsible for data quality, and ICT for information security. The performance team have developed a strategy for data quality"*

### **General and Collated Points from Interviews and Workshops**

- Two of the local authorities have information security certification
- There are new challenges with mobile devices - the periphery
- Staff generally have to sign confidentiality agreements, acceptable use policies, information security policies
- In some organisations there are spot checks on whether computers are locked or not
- Security is often seen as 'about computer systems'
- All of the organisations that were interviewed had lost data
- In one reported instance of data loss, there was no possibility of recovery
- In one reported instance of data loss, considerable time had to be spend in re-entering data from paper sources
- Interviewees reported the theft of PCs from buildings that had led to data loss
- In all the organisations, staff had been disciplined for a range of issues that directly relate to information governance, for example, the inappropriate use of information systems
- In some cases, access to the internet is restricted and staff have to ask for access to particular sites
- The complexity caused by the continued development of technologies was raised. The management of mobile telephones was mentioned, both in relation to the safety of information and the safety of staff; this issue was also raised in relation to the use of other mobile devices
- Councils are increasingly working with a range of stakeholders and partners and this has raised a number of issues; however, in general these were perceived to be information governance issues rather than technical ones.

## **7 Compliance**

### **Comments from Interviews and Workshops**

*"Everyone seems to think the information is for them, not for anyone else"*

*"Unless information can be shared, then eventually the organisation will be caught out by FOI"*

*"Am aware that some local authorities have a register of FOI requests and how they have been dealt with; this may cut down the time spent answering requests because previous responses can be re-used if they are relevant"*

*"FOI is one department, data protection is with personnel, and then I'm the information manager"*

*"We did have an FOI team but it was disbanded after six months because 'we don't need to do it anymore'"*

*"There are lots of strategies that talk about access; for example, the publication scheme. There is a need to bring these altogether"*

*"There are information sharing protocols within departments, but the organisation does not have a single list of them all"*

*"The general philosophy is to give access unless there is a reason not to".*

*"The principle is to not give the information until it can be proven who the person is (for personal data requests), and then it must go through the data protection officer"*

*"There is an information sharing protocol between us and two other organisations - but only about 2% of the staff are aware of this"*

### **General and Collated Points from Interviews and Workshops**

- FOI and subject access requests in general are rising
- However, in some areas, interest in particular subjects is dropping, for example, particular types of requests from the press
- FOI is much more difficult when there is patchy records management - this impacts on the amount of time and resource that is needed to answer FOI
- Compliance is seen very much about FOI and DPA; there was much less understanding about the need to comply with other legislation such as copyright
- Compliance with the policies of the organisation itself is very uneven; there are often pockets of exemplars and other areas that don't seem to take much notice
- Personal details of someone had been used without their full permission
- What exactly is the business case for the use of metadata?

## **8 Data Quality**

### **Comments from Interviews and Workshops**

*"Key information about people has been found to be missing from their records"*

*"Even basic information like postcodes gets put into the system wrongly"*

*"The 'same' data can be in 2- 3 systems - but each time it is put in by different people"*

*"Data quality is 'yet to be done'"*

*"Accuracy and consistency can be ok when in an island...but it needs to be at a much higher level when it comes to be shared"*

*"There is a relationship between the quality of data and its function in the organisation...need to think of the statement 'manufactured to a certain quality'."*

## General and Collated Points from Interviews and Workshops

- There is a need to define what 'data quality' means
- There is a need to define what the metrics for data quality should be
- Data quality is a people issue as much as a technical issue; in fact it is probably more of a people issue
- Both consistency and quality are needed for data
- Data quality issues are related to who owns the data; if there is a lack of ownership of data, it can be difficult to ensure or guarantee the quality
- Therefore, for good data quality, there needs to be designated data ownership
- It needs to be clear that the organisation owns the data, not individuals, and therefore there needs to be both a corporate and sectional responsibility for data quality
- There needs to be an understanding of the relationship between intellectual property rights and data quality; if the organisation owns the IPR, then it needs to ensure the quality of the data
- Working in partnership raises issues about data quality; how can the data from other organisations be validated for its quality?
- There are often wrong assumptions about data collection; it is assumed that data is always collected in the same way, but this may not be the case; this impacts on the quality
- There is a lack of understanding of how data collection works; for example, many organisations have little idea how many forms they have, how these are used and whether the fields in forms are consistently used to collected data
- Data collection is not often thought of as a corporate activity
- Data 'quality' needs to be defined. Not all data needs to be created to the same standard
- Data quality will not ever be 100% and that needs to be understood and acknowledge, without losing sight of the need to have good data quality; and accurate data quality within specific areas of the business
- There is a relationship between complaints and data quality but this is not always properly understood within the organisation
- Data quality is beginning to get a higher profile because of organisations such as the Audit Commission pushing it up the agenda
- Poor data quality stops people sharing data - they don't want their poor quality data to be exposed
- Data quality should be considered in its widest sense - including areas such as emails
- The quality of emails greatly varies and is perceived as potentially creating problems because while it is an integral part of the workflow process of individual workers, it is generally unregulated; there is generally very little quality assurance, if any, of email that leaves the organisation in the general direction of the outside world
- Automated responses are often unregulated and present a set of very mixed messages to the outside world.

## 9 Records Management

### Comments from Interviews and Workshops

*"There is a lot of scanning going on, but there is no real policy around this. There is an awareness that if something is scanned, that it needs to be in line with BIP 008 - particularly when a scan is taken and the paper is destroyed. Some parts of the council, such as benefits, have been scanning for years"*

*"Future proofing is a problem - we don't have a strategy for long term future proofing"*

*"Some of the silos do actually have good records management"*

*"Metadata is too hard and there is no tangible business case"*

*"There is a big need to change the culture around the use of email - there is a lot of confusion as to whether emails are records or not"*

*"Archiving is sporadic....there is a duplication of records because staff don't trust the systems...either from a technical or human perspective"*

*"Huge problems have been created by the effective decentralisation of filing because of the desktop PC"*

*"Data is held in legacy systems...but the software is no longer supported"*

### **General and Collated Points from Interviews and Workshops**

- FOI and DPA have been big drivers for FOI
- There are silos of good RM within many of the councils - but there is a problem in that they are silos, rather than there being widespread best practice
- Training is very uneven across, and within organisations - there is often a lack of understanding as to what records management actually is and what it involves
- Version control is very patchy and this often creates an extra burden of work that could be easily avoided
- In one organisation, data management inventories are used on a regular basis and have been proven to provide real benefits - this type of best practice should be shared
- The storage of paper records in basements had caused problems for at least one organisation
- Data has been discovered on microfiche
- Data has been discovered on cassettes
- Records management function within Children's Services Department with responsibility for corporate records created within that department Works closely corporate records and information manager
- In at least one instance, a bid for funding for a corporate EDRMS (Electronic Document and Records Management System) was rejected by the finance department for 'being too costly', although this consideration was also made with reference to the Local Government Review
- File plans have been created using the Local Government Services List (LGSL)
- However, the use of classification schemes and controlled vocabularies such as the Integrated Public Sector Vocabulary (IPSV) has been patchy
- Email is not being formally managed as a set of records
- The understanding of retention and disposal varies a great deal. Some parts of the organisation, particular sections such as finance and children's service do understand this - but it's not corporately understood
- There is the use of secure and certified disposal

## **10 Taking Information Governance Forward Across the Region**

Through the interviews and workshops, people expressed a number of ideas about how information governance could be taken forward at a regional level.

- The adoption of a standardised approach to information governance. While there may

be 'no one size fits all' and organisations may want to add a local flavour, it was clearly recognised that the underlying standards for information governance (such as the legal framework around FOI and DPA) are the same

- Enabling a network to share and develop knowledge - people commented favourably on the way the workshops enabled them to increase their learning. One person commented on their feedback form *'some myths around FOI were expelled'*
- There was a strong demand for setting up further meetings and workshops - people found the workshops useful in confirming that they were at least going in the right direction. They also found it useful to find they were not the only people to have particular problems; bringing down the sense of isolation people can feel was seen as valuable
- There was a lot of support for setting up a regional information governance group
- One person commented *"I think coordinated regional work is vital for driving this work forward with individual organisations - it needs a high profile that regional work can provide"*, and this comment was supported by a number of people
- Briefing papers for Chief Executives and senior officers were suggested

## **11 Conclusions**

This benchmarking exercise involved a large number of staff from local authorities with input from other organisations such as North East Connects, the University of Newcastle, the University of Northumbria and the Information Commissioners Office.

The engagement of all these people was supportive and inquisitive; each of the players wanted to find out more and were willing to share the information, knowledge and experience that they have gained at both an operational and strategic level

There are some excellent exemplars of good practice in a number of areas, but perhaps no one organisation will claim that they have got 'everything right' and in a changing domain such as information governance, there is an acceptance that work will always be ongoing and vigilance will be required at all times. It is recognised that information governance is a process, rather than something that is done once and can then be forgotten about.

There is a core group of people across the region with a very high level of experience and knowledge of both the strategic need for information governance and what that involves, and of the practical questions and changing nature of the issues. This group - as well as people new to the subject - expressed a strong interest in organising their knowledge and experience on a regional basis and would like to see the continuation of regional work. There is certainly enough interest to consider the establishment of a community of practice that could act as a conduit for the exchange of knowledge and ideas, and the creation of a space where complex problems could be discussed and resolved.

Information governance is a critical activity that organisations must do; but not always the most high profile or best understood. Having said that, there was a great deal of enthusiasm amongst the participants of this benchmarking to address and resolve the issues.

Finally, this is an appropriate place to thank everyone who gave their time and resources to making this piece of work possible and for engaging with the subject at such a high level of interest and knowledge. There is a great deal that can be built on across the region for the improvement of information governance both now and in the future.