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There are practical business reasons for having an information management strategy. Better information management will create efficiencies in accommodation, IT and better use of its staff by providing ready access to relevant information and the storage or destruction of irrelevant information.

This will, in turn, lead to a better service provided to residents and other service users.

Increasingly our services are provided in collaboration with a range of partners from all sectors. The effective and efficient provision of these services requires that information passes between organisations in a timely and appropriate manner. The challenge is to provide information in a secure way.

The aim of secure information is to “share but protect” where the motivation to “protect” is to safeguard the sensitive content from unauthorised disclosure.

The information management strategy will set in place a foundation from which information sharing protocols can be developed to ensure that when information of any nature is passed between organisations it is accurate, timely and secure.

There are clear links between information management and performance management. This ranges from how we measure our organisational performance right the way through to our individual performance, through PDCS.

This means that it is everyone’s responsibility in the organisation to ensure that information is managed effectively. We have a duty of care to our customers in ensuring that information is handled in the best way possible and this strategy sets out how we intend to further improve information management.

It is up to every single one of us to help ensure the success of this strategy.

[Signature]

Jon Pease
1. Executive summary

This strategy sets out a framework for information management in Croydon Council. It provides a comprehensive and corporate approach to all aspects of information management. It seeks to apply consistent, corporate standards of information management across all council held information. In doing so, it reflects the increasing legal framework that is now imposed on public sector information through legislation such as the Freedom of Information Act (2000), full implementation of the Data Protection Act (1998) and the requirements for respect for private life and freedom of expression in the Human Rights Act (1998).

The key goal of the information management (IM) strategy is to implement effective information and records management policies and systems in the Council. The IM strategy also seeks to place the principles of managing information within the Council.

These principles can be summarised as:

- Relevance, accuracy and openness
- Security and confidence
- Accessibility
- Effective delivery

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

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

Ultimately, the strategy seeks to provide a framework for development, amendment and improvement. As such, it should not be viewed as a static document but one that will evolve over time to reflect changes in best practice, legislation or council priorities.

At the heart of the IM strategy lie 4 overarching themes. These will determine the overall plans for the continued development and improvement of information management.

An appropriate IM structure

There needs to be defined information management roles at all levels in the Council. These may be discreet from existing roles or incorporated as part of current roles within the organisation. Best practice suggests having a Chief Information Officer (CIO) within the organisation who acts as the guardian of all things which come under the auspices of information management.
**Effective IM policies**

There need to be clear and coherent policies for access to information, data protection, records and document management, information sharing and information security and surveillance. These policies need to deal with issues of compliance, consistency, use of information in relation to Council priorities, and privacy. Any new policies must integrate with existing policies and procedures.

**Excellence in records and document management**

The strategy sets out the need for a corporate file classification system, as well as the need for an information audit within all departments. The aim of these will be to come up with an overarching taxonomy of electronic files and folders. A key part of this theme will be to maintain and actively use the corporate information asset register.

**Changing the culture through communication and training, with effective monitoring and performance management**

A comprehensive programme of communication and development activities will take place across all parts of the organisation. These will range from face to face sessions as part of our “Doing the Right Thing” initiative, to focused e-learning. We will use a specialised system to track participation and understanding.

This training will support the dedicated IM page on the intranet complete with a toolkit and guidance.

Only by changing the way people in the organisation view and manage information will the strategy take hold. Where appropriate, information management objectives will be added to individual performance plans. Departments and teams should also be measured on how well they do against IM specific objectives.
Introduction

Information is a valuable council asset that requires effective management. It also represents one of the services that the Council offers to residents and service users.

This strategy establishes the framework for the delivery of the Council’s information management approach and to provide an information management ethos throughout the Council.

The principles of managing information effectively were set out in the executive summary. A number of services already operate effective information management as outlined by these principles. However, there is no clear, consistent and co-ordinated corporate framework.

With the development of corporate IT structures, including the provision of an Electronic Document and Records Management System (EDRMS), it is timely to complement this development with an Information management framework that will apply to all information, both electronic and physical. Further impetus is provided by the need to ensure strong compliance within an ever growing and changing legal framework in relation to public sector information management, as well as the need to be more efficient in the use and storage of information. The benefits of the strategy will include:

- Efficiency savings through the more effective use of physical, electronic and human resources
- Better customer service through improved access to relevant information, making requests easier to handle in a shorter amount of time
- Environmental benefits by reducing reliance on paper files and physical storage
- Better working environment through the removal of irrelevant information and documentation from the office environment, allowing staff easier access to the information required to perform their work – this will have a positive impact on home and mobile working
- Improved compliance with legal requirements thereby enhancing the Council’s reputation
Corporate context

Elected members are determined to transform Croydon into one of the most efficient councils in the country. The more efficiency savings that are made, the more that can be invested into key services and the things that matter most to local people.

The corporate objectives, as set out in the 2011-2013 Corporate Strategy, are:

1. Resident and Customer Priority Services
2. Transforming the Council
3. Public Service Reform
4. Empowering Communities
5. Competing as a Place

The IM strategy has a particular impact on the second priority and will be a key enabler for improving security and efficiency through the New Ways of Working.

The Council also want to put Resident and Customer Priority Services forward and the Information Management Strategy will enable this by:

- The provision of clear, accurate information and records for the determination of council policies and strategies
- Greater transparency and accountability, thereby enhancing the Council’s credibility
- Easier access to streamlined information, leading to more effective performance monitoring and reporting
- An improved work environment for staff with reduced need for electronic and physical storage
- More effective information retrieval, allowing customer queries to be handled more quickly and effectively

Information management is crucial to ensuring the Council meets these targets. By reducing the amount of wastage from printing and unnecessary physical storage, any savings can be put back into essential services. By having a more effective way of managing information, staff will be able to access what they need much quicker, thereby helping the customer in a more expeditious manner.

Examples of systems already implemented include: CHRIS (the e-HR information system), corporate GIS (geographic information system), an integrated children’s database and an enhanced CRM (customer relationship management) system. Sharepoint 2010 will be rolled out during 2012 and is the Council’s agreed EDRMS system.

By further developing our CRM capability we will be able to rationalise systems across the Council which in turn means we will be able to cleanse the ‘Master Data’ to feed into the CRM system. The detail around CRM development is contained in the ICT strategy. Ultimately, without effective information management the five themes of the ICT strategy will be difficult, if not impossible, to achieve. The themes are:

1. Excellence in customer service
2. Increasing access for citizens and communities
3. Transforming services for children and young people
4. Increasing resources through efficiency
5. Enabling a high performing organisation
Objective one: An Appropriate IM structure

Every department, service, team and member of staff creates recorded information and as such, all are responsible for its effective management. Without the engagement and involvement of staff at all levels, the strategy will not succeed.

One of the main goals is to make information management less of a job for everyone and more of a job for specialists or those who are specially tasked with taking on this work in addition to their day job.

Success can be achieved through establishing clear priorities for information management, effective communication and performance management. In effect, teamwork is the thing that will ensure effective information management.

Responsibility for information management will fit within the existing responsibilities of all managers in the organisation, although they will need to be supported by IM specialists, as mentioned below.

IM also needs a clear corporate management hierarchy to ensure that implementation of the strategy is given the appropriate level of direction, that policies receive expedient corporate approval and that performance is continuously and effectively monitored. This hierarchy may be incorporated into existing management structures or set up as a separate structure. For practicality, the former is better.

The responsibilities for IM will cascade as follows:

**CMT:** Has corporate responsibility and oversight, as well as ensuring IM relates back to the corporate priorities.

**DMT:** Has responsibility for implementing IM standards and policies within the department and subsequent divisions, responsibility for meeting any performance indicators and targets set through the strategy, and ensuring that IM is a regular and important part of the DMT agenda.

**Chief Information Officer (CIO):** The role of the CIO ensures the IM strategy is implemented at both a business and technical level and that business processes are increasingly efficient. Ultimately, the CIO is the agent of business change.

**Information Management Steering Group:** The Steering Group will oversee the enhancement of information management and its strategy, governance policies, procedures, guidance, training and communications to:

- Ensure the Council has a coherent Information Management framework
- Own the Information Management policies and procedures
- Ensure the Council complies with its legal requirements including (but not limited to) Data Protection, Freedom of Information and Caldicott requirements
- Review data protection breaches
- Ensuring that Information Management is part of the culture of the Council
- Support the Council’s transformation agenda
**Caldicott Guardian:** The Guardian plays a key role in ensuring that Council’s social services Responsibilities and partner organisations satisfy the highest practical standards for handling individual’s identifiable information. Acting as the ‘conscience’ of an organisation, the Guardian actively supports work to facilitate and enable information sharing and advise on options for lawful and ethical processing of information as required.

The Caldicott Guardian also has a strategic role, which involves representing and championing Information Governance requirements and issues at Board or management team level and, where appropriate, at a range of levels within the organisation’s overall governance framework.

**Information Manager:** The Information Officer will drive forward the IM agenda on a day to day basis. Responsibilities will include (but are not limited to) running the IM programme (e.g. training, communication, policy review), putting in place appropriate Records Management across the council and being the single point of contact for IM within the Council.

**Information Management Champions:** This should be a senior member of staff within each service. IM Champions will be responsible for promoting and driving forward the IM agenda. In particular they will promote IM training and awareness. They will also be the first point of contact for IM queries within their respective services.

Specialist support staff: ICT have responsibility for identifying and rolling out any technical solutions to support IM. Legal services offer legal support in relation to IM (such as FOI requests and data protection issues).

All staff: Have responsibility for excellent information management following specified work practices and/or workflow.

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**The Information Management High Level Framework Org.Chart**
Objective two: An effective policy framework

The Council already has multiple Policies, Methodologies, Statements and Principles relating to Information Management. These policies have been developed independently. This strategy recommends the consolidation of the Main and most appropriate Information Management Policies in a comprehensive, co-ordinated information policy framework in order to deliver the IM principles earlier on in this document. The to-be IM policy framework is illustrated in the diagram on page 15 below.

These Policies cover 6 themes:

**Access to Council information**

Relating to public requests for access to Council held information under Freedom of Information (FOI), Data Protection Act (DPA), and Environmental Information Regulations (EIR), the Access to Health Records Act and the Health and Social Care Act.

**Data protection**

Regulating and monitoring the use of personal data by the Council.

**Information sharing**

Establishing principles and procedures for the development of information sharing with partners and within the Council, via formal protocols or otherwise. This will need to take into account the various legal issues relating to, e.g. DPA in connection with the need to reduce crime or shared information between Adult Services and the Primary Care Trust (PCT).

**IM Related Policies:**

- Freedom of Information (FOI)
- Data protection
- Caldicott Guardian Principles
- Records Management
- Records Retention
- Records Destruction
- Protective Marking
- Data Quality

**Information Security Policies linked to IM:**

- Information Security Policy
- Remote Working Policy

**ICT Policies linked to IM**

- Acceptable use of email and intranet
- IT Access Policy
- Mobile Communication Device
- Removable Media Device
- ICT security
- Identification, authentication and password
Information security

Providing corporate standards for the security of information held by the Council and meeting relevant standards BS7799 including security classification of records. More recently, a pan-government programme called Government Connect (GCSx) is rolling out with the aim of providing a secure network between central government and every local authority in England and Wales.

Records management

Regulating the maintenance of all Council held records throughout their lifecycle and meeting government standards and the Code of Practice under section 46, FOIA. Records management will incorporate the Archives policy. The policy will enable the organisation to adopt a system where there is a single corporate record of recorded information.

Document management

Dealing with the creation of documents, filing, security, disaster recovery and authentication. In particular, the policy will enable more effective collaboration and version control.

Effective policies will enable:

- Compliance
- Consistency and simplicity Council priorities to be delivered

Some policies are fully operational, whereas others will require review and/or consolidation. Any review will need to consider the quality of public access to these policies. Where a policy is in place it will be assumed that it is fit for purpose and made accessible to all staff through the single Information Management repository page on the intranet.

Main IM Policies Framework

Best Practice Recommendation

<table>
<thead>
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<th>IM Strategy Framework Area</th>
<th>IM and the Law</th>
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<td>Data Protection Act *</td>
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<tr>
<td>Data Protection</td>
<td>Data Quality Policy</td>
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<tr>
<td>Access to Council Information</td>
<td>IT Access Policy</td>
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<tr>
<td>Information Sharing</td>
<td>Email, Electronic Messaging and Internet Use Policy</td>
</tr>
<tr>
<td>Information Security</td>
<td>Information Security Policy Incl MCD, Removable &amp; Remote</td>
</tr>
<tr>
<td>Records Management</td>
<td>Records Management Policy Incl Retention and Destruction</td>
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Information Management Strategy

Freedom of Information Act *

Protective Marking Policy

Third Party Access Policy

Freedom of Information
Objective three: Excellence in records and Document management

A cornerstone of the IM strategy is effective records and document management and as such, this forms a major work-stream in the organisation’s journey toward excellence in information management. The difference between records management and document management is set out below:

Document management

- The systems commonly used to provide storage, version control, metadata, security, as well as indexing and retrieval capabilities.

Records management

- The systems adopted (SharePoint 2010) to control and manage the creation, use, retention and disposal of information in a way that is administratively and legally compliant but also serves the Council’s operational needs.

Full implementation of records and document management is not required for all information held by the Council. For example, closed files awaiting disposal can be assessed as not requiring full records management compliance as this would not provide value for money or create a significant compliance risk. This is only as long as they are stored securely and are readily accessible. However, where files are bought back from storage they should be entered into the EDRMS system as a means of reducing ongoing costs.

As a means to ensure that best practice is followed within the Council we will adopt a Retention Guideline document such as the revised Records Management Society standards. This will result in:

Compliance:

- Freedom of Information Act (2000) and Data Protection Act responses being more efficient and accurate
- Duplicates and drafts being destroyed safely and according to defined policy
- Information security becoming simpler and more effective
- Reduced risk of enforcement action

Consistency and simplicity:

- A common corporate standard and related workgroup standards for the classification and storage of information, improving retrieval, disposal and re-use of information
- Reduction in unnecessary information and duplication

Information asset register

Effective information management requires the Council to accurately know what information it holds at any given point in time. Legislation also increasingly requires public registers of information. For example, the Freedom of Information Act (2000) requires the Council to have a publication scheme of all publicly available information held by the Council. To ensure consistency and reduce duplication, a single information asset register has been created.
The establishment of such a register will:

- Ensure compliance with legislative requirements (building on the existing Publication Scheme)
- Identify means of access to information
- Identify classification under the Council’s Information security policy
- Identify charges for accessing information (including charges for commercial re-use under the Re-use of Public Sector Information Regulations, 2005)
- Identify retention period and necessary action at disposal
- Where possible, be available for public access

The Information Asset Register will have a designated ownership and will be ruled by updating cycles and version control. The IAR will also be available on the Intranet.

**Corporate file classification system**

Whilst there will be an overarching framework for file classification through the organisation of both electronic and physical files, departments will be able to adapt this framework to suit their specific needs. This adheres to the ‘one size doesn’t fit all’ approach. At this stage, only files and not individual documents will be required to be classified. Individual document management within files will need to be in accordance with file management procedures adopted by departments, as long as they meet the relevant IM policy standards.

A corporate file classification system is vital to the success of the Electronic Document and Records Management System (EDRMS) solution. It also needs to reflect national guidance and standards, in particular the National Archives’ guidance on electronic records management.

The file classification system must also seek, as far as practical, to:

- Have a single corporately agreed basis for classification
- Be simple to use
- Allow for the tracking and location of file information at any stage in its life cycle
- Allow for information relating to a single issue to be identified and collated quickly and accurately
- Be compatible with the Information asset register, IM policy framework and legal requirements for accessing information
- Ensure privacy and confidentiality are appropriately respected and maintained (including compatibility with the information security and data protection policies and where appropriate the Caldicott principles)
- Be achieved within existing Council resources, such as building on existing software capability
- Develop a mandatory office directory tree built around the Council’s organisational structure or a similar logical and simple structure
- Allow for exceptions, where this meets statutory requirements, is a tolerable/ manageable risk and/or is the value for money solution, e.g. where a service already operates a ‘stand alone’ file classification system that works effectively and is compatible with the aims of the IM strategy
File management systems

To ensure that individual documents can be located within files, all services will need to adopt file management policies following corporate guidelines. Many services may already have effective systems in place.

It is impractical to adopt a mandatory corporate file management system for individual documents. Not only would this disrupt already effective systems, it would be almost impossible due to the enormity and diversity of the information held by the Council and as such, would be an ineffective use of resources. Therefore, guidance will need to be provided by the Chief Information Officer on the following principles:

- Systems should make individual documents readily available on any file
- Systems, where appropriate, should ensure adequate security, confidentiality and privacy
- Systems should be simple to adopt and maintain
- Systems must comply with the Council ICT strategy

The information champions, departmental IM staff and any specialist staff will play a fundamental part in rolling out and embedding file management systems in departments. Ultimately, it will be down to all staff to make any new or existing file management system work.
Objective four: Changing the culture through Communication and training with effective monitoring and performance management

To successfully embed the strategy and its principles in all parts of the organisation requires nothing less than a seismic shift in attitude and understanding. In order to help this shift, there needs to be a comprehensive set of activities around learning, development, communication and monitoring.

There are very clear benefits to effective information management but to realise these benefits will involve time and effort by all services and by all members of staff. The key to any initial communication activity will be to hook into the “why should I?” aspect of culture change. The Internal communication team will play an important part in ensuring any communication has high impact, driving home key messages relating to information management. The IM Steering Group will guide the specific communications to being to embed the language and ethos of IM into the organisation.
In addition our “Doing the Right Thing” training will continue, including a specific module on IM.

E-learning will be crucial to training our people as they are becoming increasingly mobile and spend less time in the office.

We will procure specialist software to deliver and monitor training and understanding. This software will be customised to deliver the relevant policies to each member of staff.

Educating people early is another enabler. Therefore, IM will be embedded as part of the induction process, both at a corporate and a departmental level. A series of short ‘How to…’ guides have been developed and put onto the dedicated IM intranet page.

Empowering managers to embed IM in each of their services is another key facet to changing the culture. Therefore, each service will have its own Information Management Champion who will be responsible for leading the culture change in their area. Additionally, targets will be set for completion of training and compliance.

A key action for CMT will be to set clear targets for each of these measures. This can also be done locally by DMTs, recognising that one size does not fit all. Ultimately, any measures should cascade down so that they end up as PDCS objectives.

The monitoring and performance management theme is the central pillar in creating an organisation that manages its information in the best way possible. This will help the organisation to ensure that it is on track, as well as identify any problems that may prevent parts of the strategy from happening.
High Level Plan for Best Practice Information Management Programme and Key Workstreams

High Level IM Programme Plan

Roles & Responsibilities
Appoint agreed roles (IM Mgr & Champions)

Policies & Procedures
IM Strategy, framework & all policies signed off

Information Storage & Destruction
Storage systems (e.g. Sharepoint) in place and procedures signed off

Training & Compliance
Training rolled out to ALL staff. Tracking & compliance audits in place.

IM Accreditation
Relevant IM accreditation gained for the Council ((ISO/IEC 27001)