# GWYNEDD COUNCIL CABINET

## Report to a meeting of Gwynedd Council Cabinet

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| **Date of meeting:** | **26 January 2021** |
| **Cabinet Member:** | **Councillor Nia Jeffreys** |
| **Contact Officer:** | **Ian Jones** |
| **Contact Telephone Number:** | |
| **Title of Item:** | **Information Plan** |

### 1 THE DECISION SOUGHT

That the Council adopts the Plan

### 2 THE REASON FOR THE NEED FOR A DECISION

In order to set a strategic direction on how we will treat and manage information over the years to come.

### 3 INTRODUCTION

The Council has plans for its essential assets namely finance, people and property; but information is also an essential asset in today's world.  It is believed that a plan is required to set out the Council's priorities in the field over the next five years.

The plan gives attention to the different aspects of using and treating information:
- standards and quality;
- using information;
- that data is easily available,
- reducing paper use;
- the need for compliance with legislation
- and how we structure and keep all the paper and digital information we have in order.

The need to get dependable, timely and quality information has always been important but the COVID pandemic has highlighted to the maximum how essential it is in order to be able to plan effectively in an emergency.

In addition, the need to protect personal information is an important statutory requirement and we note what is expected from us in order to adhere to data protection legislation.

There is a detailed action plan for this that will be monitored by the Information Governance Operational Panel, chaired by the Assistant Head of Corporate Support.

The document has been prepared with regard to the Council's duties under the Equality Act 2010. An Impact Assessment (Appendix 2) has been carried out which did not identify any negative impacts.

## 4 THE RATIONALE AND JUSTIFICATION FOR RECOMMENDING THE DECISION

The adoption of the plan will give a clear strategic direction in the field within the Council and will enable us to implement a programme that addresses the requirements of the General Data Protection Regulation 2016 and the Data Protection Act 2018.

## 5 NEXT STEPS AND TIMETABLE

If the Cabinet adopts the Plan, we will commence a communication plan to ensure that staff are aware of the contents. Then, it will be possible to immediately commence the operational plan.

## 6 ANY CONSULTATIONS UNDERTAKEN PRIOR TO RECOMMENDING THE DECISION

### Comments of the Monitoring Officer:

I welcome this document which will provides a foundation and clarity in relation to the use and management of data in an appropriate way and in compliance with statute.

### Comments of the Chief Finance Officer

I welcome the Information Plan presented here. There is no request for additional funding, so Council services are expected to implement the Scheme within the current resources of relevant departments. Failure to use our information resources in the best way may lead to costs to the Council, whether as a result of missed opportunities, or fines for failing to keep the information secure. By realising the aims of the Plan and making more effective, efficient and secure use of information, the Council should improve services to the people of Gwynedd.

# Information Plan
# 2021-2026

## 1.    Introduction

### Target
That the Council makes the best possible and lawful use of information for current and future purposes.

### Purpose
To set a direction and create a framework to make the most effective use of information and management and to protect that information.

### Aim

- Ensure that we maximise the potential of all the information resources we have
- Ensure that decisions that have an impact on residents are made on the basis of full and accurate information
- Adhere to the information acts - General Data Protection Regulation, Data Protection Act, Freedom of Information Act.
- Ensure that staff and the public are able to easily access the information

### Context

The Well-being of Future Generations Act emphasises sustainable development, and therefore it promotes electronic working, as well as having the information to be fully aware of the long term impact when making decisions, in accordance with this aim.

The General Data Protection Regulation 2016 and the Data Protection Act 2018 set robust rules on how to treat information about individuals. Many more rights are given to individuals and there is a statutory requirement for us to prove that we adhere to the legislation.

One of the main risks to the Council with the Risk Register is treating information, in terms of not only the legal side but also our ability to make the best use of all the data resources we have. This plan is a way of getting to grips with those risks.

Ffordd Gwynedd is the name given to the "way of working" that the Council has adopted in order to place the people of Gwynedd at the heart of everything it does. The Ffordd Gwynedd Plan 2019-22 emphasises the key role of information to ensure this:

- a continuous challenge to the way we work ... the decisions that follow based on evidence rather than assumptions
- ensure that performance information is used to improve the service

➢ ensure that managers and their teams use the information and data available to its full potential.

## 2. Work Areas

We have already grouped the different work plans into various work areas.

## Council Business Support

### a) Data Standards

***Aim - that we have quality data***

The Audit Commission has published standards on data quality, to be used voluntarily by public bodies. Briefly, there are six data quality features, namely:

**Relevance**
Data collected should be relevant to the reason it is being used
**Validity**
Data should be recorded and used in compliance with any relevant requirements
**Completeness**
Data needs should be noted clearly, dependent on the needs of the body and the data collection processes that are attached to the requirements
**Timeliness**
Data should be gathered as soon as possible after the event or activity, and it should be available for its proposed purpose within a reasonable period. Data should be available quickly and frequently enough to support information needs and to influence service or management decisions
**Accuracy**
Data should be accurate enough for its proposed purpose
**Assurance**
Data should be gathered in an established and consistent way across all the collection points and over time

Emphasis needs to be placed on quality as using incomplete, inconsistent information that has dated leads to a risk of making the incorrect decisions and wasting resources, and it may even lead to placing vulnerable people at risk.

This is the work programme to get to grips with this agenda:

- Developing a questionnaire to assess systems and information assets
- Working with the owners of the systems on the questionnaire, and on resolving the matters that become apparent as it is completed

- Promote good practice in terms of data quality that have been highlighted
- Development of Quality Policy

**b) Using information**

***Aim - release the potential of all the information we have***

Every day, decisions are made within the Council that have an impact on the people of Gwynedd (varying from strategic decisions by the full Council or the Cabinet, that may have an impact on everyone in Gwynedd, to operational decisions by individual officers, that may impact one or a small number of service users, but may possibly have a very significant impact on those individuals). We need to ensure that we make the best possible use of the information and the evidence we have when making these decisions.

This is the work programme for this agenda:

- As part of the project to develop the Council's human resources systems, ensure that reports are available to managers on demand to assist them in managing their workforce
- Develop 'dashboard' arrangements in order that key data is gathered and reported in a timely manner to senior managers and management teams
- Identify possibilities to communicate different sets of internal data
- Ensure that there are arrangements to refer managers and staff to key external data sets that would assist them to improve services
- Produce population projections for areas within Gwynedd
- Better information regarding the well-being of areas within Gwynedd, in an accessible format

**c) Information for staff and open information**

***Aim - ensure that information is easily available***

It is essential that relevant information for services is easily available in order that officers can undertake their work.
Placing information about the Council on the website will reduce the burden of responding to numerous Freedom of Information applications.

This is the work programme for this agenda:

**Staff**

- Ensure that iGwynedd sites are open for as long as possible

**The Public**

- That information is easily available on the website for fields where there are numerous Freedom of Information applications

**ch) Reducing paper use and promote scanning**

*Aim - reducing paper use*

We need to reduce how much paper is used for several reasons:

- Significant reduction in printing costs
- The environment's welfare
- Using less office space
- Allowing flexible working

This is the work programme for this agenda:

- Find out where the biggest expenditure is and target efforts in those services.
- Develop and implement a new operational model for the Council's Print room. This is to ensure that is it a sustainable service but is also one that contributes to the reduction in paper the Council produces.
- Present scanning projects in key areas (use Konica software to scan immediately to iGwynedd)

**d) iGwynedd**

*Aim - extend the use of iGwynedd in order for us to make the most of what it offers*

iGwynedd is the Council's document management system that is located on SharePoint. All members of staff have moved from the joint drives and are by now working on SharePoint.

Over the next few years it is necessary to ensure that we promote what iGwynedd has to offer e.g. work flows, external sharing.

We will also use some of the new Microsoft features to categorise, safeguard and archive information automatically within iGwynedd.

This is the work programme to get to grips with this:

- Transfer the existing SharePoint to SharePoint online
- Enable automatic archiving from the system
- Staff files project - improve file arrangements and facilitate access
- Ensure integration between Microsoft Teams and iGwynedd
- Develop an users network
- Create arrangements for the administration of the system

**Complying with the law**

**(a)    Adhering to data protection legislation**

*Aim - ensure compliance with legislation*

There are great risks to Gwynedd residents if personal information is not protected.

There is a risk of a fine of up to £18m for breaching the rules but also a risk to the Council's reputation and a lack of trust by people in our ability to treat information.

An obvious risk is the risk of 'information breaches' where personal information has been lost, stolen or unintentionally disclosed. There is a procedure in place to report and record every breach and to learn lessons.

The operational plan in the field of compliance notes the risks we have. These were identified by assessing the Council's achievement against the Audit Framework of the Information Commissioner's Office, the regulator in this field.

- Safety - how we manage mobile devices and manage assets
- Manage access to systems - limit access only to those who have a right and withdraw rights when staff move/leave
- The need for agreements with waste paper disposal and IT companies
- Ensure correct legal agreements with IT suppliers
- Reviewing the Security Policy
- Arrangements for service continuation
- Ensure a system to undertake Data Protection Impact Assessments
- Create an Information Risk Management Framework
- Create effective arrangements to manage CCTV systems in public places
- Ensure that arrangements to treat law enforcement information are appropriate
- Monitor and reduce the number of information breaches

**(b)    Organise and dispose of information**

*Aim - to put information in order and to dispose of it in a timely manner*

Information needs to be disposed of safely and in a timely manner, and too much information should not be retained.  This is one of the fundamentals of data protection legislation.

By disposing of information we:

- Adhere to data protection legislation
- Avoid the storage costs for paper and electronic copies
- Enable the finding of information more easily as there is less of it

In terms of the work programme, this entails:

- Reviewing, approving and the implementation of retention periods
- Ensure that electronic information is destroyed within systems
- Create an electronic archive for iGwynedd
- Undertake a review of paper storage to ensure that everything is in order
- Create a long term plan for the Records Centre (namely the Council's corporate paper store)
- Create a digital retention plan i.e. to ensure that information is readable in an electronic form for years to come

## (c) Sharing Information

***Aim - Ensure that the sharing of personal information externally follows the data protection regulations***

We will do this by:

- Forming information sharing protocols under the WASPI (Wales Accord on Sharing Personal Information) framework where personal information is shared regularly with a number of external agencies.
- Developing secure methods of sharing information externally (e.g. via secure e-mail, encrypted e-mail (Egress), using Teams and SharePoint online)

## (ch) Training

***Aim - that staff are trained in data protection and IT skills***

It is expected that every member of staff will receive an element of data protection training.
As staff errors are responsible for the vast majority of information breaches, the training provision is a key part of the work to try to reduce the number of breaches.

We have also identified that there is a need to improve IT skills. There is a corporate plan under way to get to grips with this.

It should also be ensured that there is regular training on iGwynedd in order that staff can make the most of technology.

This is the programme for this field:

- Undertake a training assessment to identify various staff, e.g. non-computer staff, at a different level of authority
- Develop a corporate training plan, to include new frontline staff, refresher training, specialist training, follow up processes
- Provide and present the iGwynedd training plan

## 3. Delivering and monitoring the Plan

The Research and Information Service of the Corporate Support Department will lead on delivering this Plan in accordance with the action plan, with the support of other services within the Department and across the Council.

The permanent staff resource of 7.8 full-time equivalent in the Service (rough split per field of work) will work on delivering these developments as well as the day-to-day duties of the Service. An additional temporary resource will be required to achieve some elements of the Plan and this is already receiving attention.

| Area | Service staff resource |
|------|------------------------|
| Using information | 3.3 |
| Compliance with legislation | 2 |
| iGwynedd record management and support | 1 |
| Open information / other developments | 1.5 |
| **Total** | **7.8** |

The Information Governance Operational Panel will monitor the operational plan every quarter.

The number of information breaches is a key measure and this will be monitored by the Information Governance Operational Panel and via the performance challenge procedure.

## 4. Review

The Plan will be reviewed annually.

# Equality Impact Assessment

See the sheet *How to Make an Equality Impact Assessment* for assistance in filling out this form.  You are also welcome to contact Delyth Williams, Policy and Equality Officer on ext. 32708, or [DelythGadlysWilliams@gwynedd.llyw.cymru](mailto:DelythGadlysWilliams@gwynedd.llyw.cymru) , for further assistance.

The Council is required (under the Equality Act 2010) to consider the impact that any changes in any policy or procedures (or the creation of a new policy or procedure) will have on people with protected equality characteristics.  The Council also has additional general duties to ensure fairness and to foster good relationships.  Therefore, a timely Equality Impact Assessment should be completed before a decision is taken on any relevant change (i.e. that affects people with protected equality characteristics).

## 1 Details

### 1.1. What is the name of the policy / service in question?

Information Plan

### 1.2 What is the purpose of the policy / service that is being created or amended?   What changes are being considered?

Set out a 5 year plan to deal with, analyse and manage information across the Council.  Replace the previous Information Management Strategy

### 1.3 Who is responsible for this assessment?

Helen Parry

### 1.4 When did you commence the assessment?   Which version is this?

13/01/2021

## 2) Action

**2.1 Who are the partners it will be necessary to work with to undertake this assessment?**

No partners - this is an internal project

**2.2. What steps have you taken to engage with people with protected characteristics?**

As no <u>direct</u> impact is anticipated on any groups with protected characteristics, it was not considered necessary to engage about this plan specifically.

**2.3 What was the outcome of the engagement?**

n/a

**2.4 On the basis of what other evidence are you acting?**

n/a

**2.5 Are there any gaps in the evidence that needs to be gathered?**

n/a

# 3) Identifying the Impact

**3.1** **The Council must give due attention to the impact any changes will have on people with the following equality characteristics.  What impact will the new policy/service or the proposed changes have on people with these characteristics?  You are welcome to add other characteristics if you wish.**

| Characteristics | What type of impact? | In what way?  What is the evidence? |
|---|---|---|
| **Race (including nationality)** | Positive | Positive - better information will provide a more robust evidence base to plan services for people with protected characteristics. <br> Also, in relation to data protection legislation, there is specific protection for this characteristic |
| **The Welsh language** | Positive | See above |
| **Disability** | Positive | See above, and also in relation to data protection legislation, there is specific protection for this characteristic |
| **Gender** | Positive | See above, and also in relation to data protection legislation, there is specific protection for this characteristic |
| **Age** | Positive | See above |
| **Sexual orientation** | Positive | See above, and in relation to data protection legislation, there is specific protection for this characteristic |
| **Religion or belief (or non-belief)** | Positive | See above, and in relation to data protection legislation, there is specific protection for this characteristic |
| **Gender reassignment** | Positive | See above, and in relation to data protection legislation, there is specific protection for this characteristic |
| **Pregnancy and maternity** | Positive | See above, and in relation to data protection legislation, there is specific protection for this characteristic |
| **Marriage and civil partnership** | Positive | See above |

**3.2** **The Council, under the Equality Act 2010, has a duty to contribute positively to a fairer society through promoting equality and good relationships in its activities in the areas of age, gender, sexual orientation, religion, race, gender reassignment, disability and pregnancy and maternity. The Council must duly address the way any change impacts on these duties.**

| General Duties of the Equality Act | Does it have an impact? | In what way?  What is the evidence? |
| --- | --- | --- |
| **Eliminate unlawful discrimination, harassment and victimisation** | No | n/a |
| **Promote equal opportunities** | Yes | Possessing better data about the Council's workforce, and about Gwynedd generally, will provide a better evidence base for the Council to promote equal opportunities among its staff and in the county generally |
| **Building good relationships** | No | n/a |

**4) Analysing the results**

**4.1 Is the policy therefore likely to have a significant, positive impact on any of the equality characteristics or the General Duty?  What is the reason for this?**

No, but better information and data could ultimately help indirectly to provide better services in order to address equality matters.

**4.2 Is the policy therefore likely to have a significant, negative impact on any of the equality characteristics or the General Duty?  What is the reason for this?**

No - see above.

**4.3 What should be done?**

Select one of the following:

| | |
|---|---|
| Continue with the policy / service as it is robust | Continue |
| Amend the policy to remove any barriers | |
| Suspend and abolish the policy as the harmful impacts are too great | |
| Continue with the policy as any harmful impact can be justified | |

**4.4 If you continue with the plan, what steps will you take to reduce or mitigate any negative impacts?**

No negative impacts to mitigate

**4.5 If you are not taking any further action to remove or reduce the negative impacts, please explain why here.**

n/a

**5) Monitoring**

**5.1 What steps will you take to monitor the impact and effectiveness of the policy or service (action plan)?**

The action plan will be monitored by the Information Governance Operational Panel regularly.