Information Management Review Feedback

Caerphilly County Borough Council

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This project was delivered by Jeremy Evans.

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Summary

1. There are concerns about the management and quality of information and records within the public sector following widely publicised failures, and a perception that improvements in public services are being hampered by inefficient management of information. Government-commissioned reports such as the *Bichard Report*[1] have indicated a 'systemic and corporate failure' in relation to information management.

2. More recently, two reports[2] by the Audit Commission reflect little progress in local government in England and reinforce the need for appropriately managed information to support operational service delivery and effective decision making.

3. With increasing financial pressure on the public sector there is a need to maximise and exploit the information held to deliver and plan for quality services effectively, taking decisions with all the available information to support and protect vulnerable people.

4. The collaboration agenda is growing with the recent publication of the Simpson report – *Local, Regional, National: What services are best delivered where?* This is likely to set the direction of travel and, if adopted by the Welsh Government, does set national expectations over coming years. Where collaboration through efficient, integrated and shared services is required, this will only work with effective strategies for technology and information.

5. In 2010 the Wales Audit Office identified that many local authorities were grappling with using information effectively to support service transformation and efficiency savings; as a result, reviews of information management are being undertaken at all councils in Wales.

6. This review sought to answer the question: 'Is the Council's approach to information management positively supporting improvement?'

7. Our review of Caerphilly County Borough Council (the Council) concluded that: 'Whilst the Council's approach to Information is generally sound, there are governance and performance issues that have the potential to undermine the delivery of the Council's information strategy.' We came to this conclusion because:

   • the Council's arrangements for information management are generally sound, but are weakened by the lack of formal information accountability and the absence of a mandated staff training programme; and

   • information management performance is sound, although some issues need to be addressed to ensure that the Council fully complies with legislation and can recover information in the event of a major disaster.

8. Our findings, conclusions, and proposals for improvement are outlined in the table below.

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[1] *The Bichard Inquiry Report*, Parliamentary Publication, June 2004
[2] *Is there something I should know?* Audit Commission, 2009, and *Nothing but the Truth*, Audit Commission, 2009

High-level questions and findings

High-level question:	Is the organisation's approach to information management positively supporting improvement?
High-level answer: **We have concluded that**	Whilst the Council's approach to information is generally sound, there are governance and performance issues that have the potential to undermine the delivery of the Council's Information Strategy.
Assessment of current arrangements	The Council's arrangements for information management are generally sound, but are weakened by the lack of formal information accountability and the absence of a mandated staff training programme.
Assessment of performance	Information Management performance is sound, although some issues need to be addressed to ensure that the Council fully complies with legislation and can recover information in the event of a major disaster.

Proposals for improvement	1. Formally assign the responsibilities and accountabilities of the Senior Information Risk Owner (SIRO). Ensure they are vested in a role that has sufficient seniority to deliver all elements of the SIRO function, in particular:
	  • ownership of the information risk policy;
	  • ownership of the information risk assessment;
	  • champion information issues at a senior level; and
	  • provide a written statement in relation to the security of the Council's information asset for inclusion in the Council's Statement of Internal Control/Annual Governance Statement.
	2. Review the membership of the Information Security Forum to ensure that the responsibilities and accountabilities of an Information Security Forum are fully discharged and cover all aspects of information security including physical access and Human Resources.
	3. Deliver a comprehensive mandated information management training programme for all staff to ensure that the Council can demonstrate that responsibility for information issues has been cascaded throughout the organisation, attendance must be recorded and training needs to be refreshed at regular intervals.
	4. Ensure that sufficient data is held outside the recommended nine-mile limit to enable a full restoration of service information in the event of a disaster.

High-level question:	Is the organisation's approach to information management positively supporting improvement?
	5. Continue to develop more robust arrangements for whole-life cycle management of electronic information including e-mails, in particular disposal of information that the Council no longer has the rights to hold; ensuring that the Council is compliant with legislation.
	6. Further improve the response times for Freedom of Information (FOI) requests.
	7. Pause and review the implementation of the Electronic Document and Records Management System (EDRMS) to assess progress and direction, in particular consider the Council's aims for EDRMS to ensure that the current approach will deliver these aims effectively.

Question	Yes or No	Because:
Are the organisation's plans for information management likely to secure continuous improvement?	Yes	• The Council's Information Strategy is part of the wider ICT strategy and it is clear that the Council recognises the importance and significance of managing its information asset effectively. The Council's ICT Strategy was approved in October 2009 and captures briefly and clearly the main information aims for the Council. Whilst dated to end in 2012 the Council states that the strategy remains current. The Information Strategy was informed by the review of information governance undertaken by PwC in 2009-10. • A good range of clear and robust policy and guidance documents are available to Council staff. These include an Information Security policy which follows good practice based on the recognised International Security Standard ISO27001. The Records Management Society's model retention schedule for local government has been adopted by the Council and is again available to staff on the corporate intranet. This is supplemented by the 'Keith Batchelor's Retention Schedule', available through the Corporate Information Unit (CIU). Other policies include Data Protection Act (DPA) and Freedom of Information Act (FOIA). • The Council has purchased MetaCompliance software which it uses to help distribute and publicise new and revised policies. MetaCompliance also records who has displayed the policy on screen ensuring that the Council has a log of staff accessing and accepting the new/revised policy or guide. • Information governance action plans have been developed by the Information Governance Project Team to guide information governance work. The Council's plans support its strategic aims and requirements for compliance with legislation. The EDRMS implementation also has an established delivery plan. • As part of the Council Business Process Improvement (BPI) initiative, analysts are reviewing existing processes and identifying areas where increased use of technology could support more efficient and effective processes.

Question	Yes or No	Because:
Are the organisation's arrangements for information management likely to secure continuous improvement?	In part	• The SIRO responsibilities are not formally assigned to a member of Corporate Management Team, but are undertaken by the Head of ICT and Customer Services (see PFI 1). • The Council has an effective CIU which manages strategic records management, data protection (including data sharing), freedom of information and environmental information regulations for the Council. The CIU has three staff who are supported by a network of representatives from directorates and service areas. CIU is managed by the ICT Business Manager and falls within the remit of the Head of ICT and Customer Services (SIRO), who reports to the Deputy Chief Executive. The Cabinet Member for Corporate Finance, Procurement and Sustainability provides oversight and a link to the Council's Cabinet. • CIU submits biannual performance reports on the corporate approach to FOIA/EIR/DPA to Directorate Management Team (DMT), CMT and Policy and Resources Scrutiny Committee. Additional reports on records management and data sharing are also submitted to DMT and CMT, and occasionally Policy and Resources Scrutiny Committee and Cabinet, when the need arises. • The Council has an established Information Governance Project Team, chaired by the ICT Business Manager. This group oversees the governance and records management development work undertaken by the Council. Individuals selected from the directorates participate in this team as designated information stewards and are responsible for representing the information needs for their directorates. • The Council's ICT Security Forum meets quarterly to review security issues in line with ISO27001 accreditation. The ICT Security Forum also takes a wider view of information security across the Council as a whole. The ICT Security Forum is chaired by the Head of ICT and Customer Services (SIRO) and is attended by all the senior ICT officers and the IT Security Officer and assistant IT Security Officer. These latter two officers are the ICT Security Team for the Council. However, Human Resources and facilities management are not represented on the forum which could leave gaps in the forum's knowledge (see PFI 2). • As noted above, the Council has attained ISO27001, covering the ICT Department. ISO27001 accreditation status imposes a level of security with which staff must comply within the scope of the certification. The Council plans to broaden the scope of the accreditation as it moves forward. The Council is also Government Connect Secure eXtranet (GCSx) compliant.

Question	Yes or No	Because:
		- To ensure that new and existing information risks are documented and managed, the ICT Department has a Risk Management process that is undertaken when new systems are adopted or weaknesses in current systems are identified. Regular reports to CMT and Policy and Resources Scrutiny Committee provide an opportunity to highlight identified risks and obtain agreement for changes to processes, for example, in March 2011 Policy and Resources Committee received a report which outlined proposed changes to FOIA process to try to improve performance. - There are good examples of stakeholder engagement, for example, the planning of the Local Service Board (LSB) WASPI-based data sharing programme. The Council has engaged with internal stakeholders (eg, ICT colleagues and other directorates) via briefing sessions, with external stakeholders in the Greater Gwent Area (including other authorities, health and police) via telephone and meetings, and with the Welsh Government as necessary. The Council has a register of sharing arrangements which is comprehensive. - Members are offered training on information management, including sessions on FOIA/DPA. Following the 2012 local government elections a member induction programme has been established and this includes information and security sessions. - The CIU champions records management, data protection and FOIA/EIR by running regular training sessions, briefings for staff, presentations to DMTs, all-user emails, attendance at CMT, P&R Scrutiny Committee and Cabinet as needed. Induction training, continuing staff training and presentations to senior staff and members reinforce these messages. However training other than at induction is not mandatory (see PFI 3). To enhance the Council's information training provision and allow all those who attend to be tested and a record kept of their interaction with the course material, a computer-based training solution is to be implemented in the autumn of 2012. - The Council and Blaenau Gwent CBC have agreed to merge their social service functions; this includes the merge of social service information systems. The councils are undertaking an assessment of both social care systems to determine the way forward. Any decisions will be taken in the context of the debate about a national social care system for Wales.

Question	Yes or No	Because:
Is the authority's information management performance supporting it in providing efficient, effective and economical services?	In part	• The Council has made good progress in implementing the IDOX EDRMS adopted as a corporate solution (purchased in 2007). Starting with the usual implementation in Revenues and Benefits the system is now widely used within the Council. Additional services are using the system following a project plan but there is no specific timeline against which it is delivering. The Council is using IDOX as an intelligent file repository (an electronic document system) rather than a records management system and as such won't gain the full benefit of an EDRMS if it follows this approach. The records management module of IDOX is not yet available although it is due in the next major release (version 4) of the product. The Council is continuing the development of existing records management programme which includes driving forward its implementation of IDOX as a records management solution (see PFI 7).
		• The Council has not yet developed a corporate file plan due to the current approach to EDM. However this will need to be addressed if greater benefits of records management are to be realised, The Council has reviewed the Local Government Classification Scheme (LGCS) and is now working on a draft high-level corporate file plan, plus lower levels for HR and Legal Services.
		• The Council has agreed to work towards compliance with the legal record standard (BIP 2008) enabling them to provide electronic/printed electronic documents in court settings rather than the original paper record. To link document records with specific service application records, following good practice the Council is also working on linking IDOX with other back-office systems. An example of this is the linkage to support Integrated Children's Systems (ICS) in Children's Social Services.
		• The Council uses the Stellent web content management system but is considering its options (e-forms/XML, or other content management tools) to move from this product so that it uses a package better suited to its needs. It is expected that Stellent will no longer be used from the end of 2013.
		• E-mail archive is in place, although there is only limited guidance on how to manage this process available for staff, this results in only limited take up (see PFI 5). Again the Council is looking for ways to improve and manage e-mail better to enable it to develop a more complete single records store and avoid the need for staff to search multiple locations to gain all the information relating to a specific issue. Options being considered include the purchase of a management tool that will seek out duplicates and automatically determine file plan categories. This has budget implications which will be considered once options have been

Question	Yes or No	Because:
		evaluated.
		• The Council is undertaking a full information audit. This will improve the level of knowledge the Council has of its information asset addressing the PwC report recommendation. This audit is being delivered by departmental/service representatives and uses a template form. Learning from early elements of the audit the Council has increased the amount of information it seeks and now includes looking at data quality. The data audit started in the autumn of 2011 and is expected to be completed by the autumn of 2012.
		• The Council's approach to data quality is good. Data quality reports are produced from all major systems and in particular the Council has made good progress with the Local Land and Property Gazetteer achieving Gold standard level for a number of years.
		• Following good practice the Council has introduced a number of physical and electronic measures to safeguard information eg, encryption of all laptop hard drives, restriction of USB devices, firewalls, e-mails and web filtering, anti-virus, clear desk policy and user identification requirements for printing documents on communal printing devices (SafeCom).
		• The Council has two data centres offering a level of resilience, and fail over capability. These data centres are on the same campus, being a few hundred meters apart. These data centres could be affected by the same disaster. Although they have separate power supplies, communications links are shared. Secure fire-protected facilities for storage of hardcopy records and removable electronic media are located across the county. Backup tapes are stored in two different Council offices, three and four miles away from the main server centres. This is below the recommended nine-mile radius affected by electromagnetic radiation following a bomb blast and could leave the Council struggling to regain access to its information in the event of a major disaster (see PFI 4).
		• Recognising that it has not solved all of its disaster recovery needs, the Council is considering options for alternative off-site storage and/or replication of servers and the data they hold. The Council is aware of the Rhondda Cynon Taff County Borough Council/Bridgend County Borough Council arrangement and is interested in using spare capacity in another Council/facility should this be available to them, rather than using the Data Centre in Blaenavon. However, no concrete plans are in place to move this forward.

Question	Yes or No	Because:
		• The Council has a robust corporate archive facility for paper information. Services are responsible for authorising the disposal of the information they hold once it meets the Council's approved retention schedule. The Records Management Society model retention schedule for local government has been adopted by the Council and is available on the corporate intranet. This is supplemented by Keith Batchelor's retention schedule, available through the CIU. • The Council has a number of established mechanisms for disposing of personal hardcopy/paper data securely, including on-site shredding for smaller quantities and use of specialist companies to destroy records securely in bulk, and in combination these methods work well. Old ICT equipment is disposed of under the Waste Electrical and Electronic Equipment (WEEE) regulations using a specialist disposal partner that certifies the process. Electronic data is not routinely disposed of; the RM functions of the IDOX EDRMS are not yet implemented making this process difficult. It is very likely that the Council has electronic information that it should no longer have access to and should have disposed of (see PFI 5).
Is the organisation effectively monitoring and evaluating improvement and performance of its information management function?	In part	• The Council attends the South Wales Information Forum (SWIF) and Wales Information Governance Group (WIGG). Comparisons with other organisations are made at SWIF and WIGG, plus informally via e-mail discussions and on discussion groups (eg, jiscmail). The Council also participates in benchmarking with partners eg, annual SOCITM Performance Benchmarking process. The Council also uses external advice provision services eg, Gartner research. • Performance reports are submitted for ICT, which include information on FOIA/EIR/DPA compliance, on a quarterly basis using Ffynnon. Additional reports on records management and data sharing are also submitted to DMT and CMT, and occasionally P&R Scrutiny Committee and Cabinet, when the need arises. The CIU submits to P&R Scrutiny Committee six-monthly reports reflecting key milestones as well as FOIA/DPA performance information. Information incidents and breaches are not routinely reported outside of the security forum, but statistics are available. Significant breaches are included in the quarterly P&R reports.

Question	Yes or No	Because:
		• Internal and external audit undertake regular audits covering systems and procedures. Information management is audited regularly by Internal Audit and external audit (Wales Audit Office/PWC). Internal Audit undertook a DPA review in 2008 and again in 2011. The most significant finding was the retention of information (paper and electronic including e-mail) past its retention date. Both internal and external audit reports are reported to the Audit Subcommittee of P&R Scrutiny Committee.
		• Recognising its weak performance in relation to FOIA request timelines the Council undertook a review and developed the FOI flowchart. This illustrates the revised process for FOIA practice. Policy documents have been updated and performance has improved.
		• For FOI requests the CIU logs all requests and disseminates the request to the required service representative. Once the data is gathered it is returned to the centre where it is subject to checking and challenge. All requests are reviewed by the exemption panel which meets weekly. High-profile information requests are also reviewed by the Chief Executive. The Council's approach to DPA Subject Access Requests (SAR) is kept as similar to FOI as possible to ensure consistency for staff, albeit working to different timescales and exemptions. Social Services operate more independently of the central process for SAR but they retain both central and legal support whenever required. All SARs go to the exemption panel.
		• The Council is taking steps to improve the time it takes to respond to FOIA requests but has further work to do. The Council received 683 requests under FOI in 2010, which is an increase of some 21 per cent on the previous year, 74 per cent were replied to within the 20-day deadline. The Council set a target of 80 per cent for 2011 and achieved 84 per cent. Two complaints from members of the public about timeliness have been made to the Information Commissioners Office. The Council is trying to meet a revised target of 85 per cent and during the first five months of 2012 it achieved 82 per cent (see PFI 6). 79 per cent of the 43 SAR requests are completed within the 40-day deadline, this is an improvement in performance but still remains below the Council's own target of 80 per cent.
		• The Council's FOIA website content is adequate, it could be used to better effect through linking the various elements of the site together, this would make it easier to use for the public.

WALES AUDIT OFFICE

SWYDDFA ARCHWILIO CYMRU

Wales Audit Office

24 Cathedral Road

Cardiff CF11 9LJ

Tel: 029 2032 0500

Fax: 029 2032 0600

Textphone: 029 2032 0660

E-mail: info@wao.gov.uk

Website: www.wao.gov.uk

Swyddfa Archwilio Cymru

24 Heol y Gadeirlan

Caerdydd CF11 9LJ

Ffôn: 029 2032 0500

Ffacs: 029 2032 0600

Ffôn Testun: 029 2032 0660

E-bost: info@wao.gov.uk

Gwefan: www.wao.gov.uk