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Information Management – **Monmouthshire County Council**

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The team who delivered the work comprised Paul Cunningham and Dave Wilson, programme managed by Non Jenkins under the direction of Huw Rees.

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Summary

1. In March 2015, we undertook a corporate assessment at Monmouthshire County Council (the Council). As part of our corporate assessment, we reviewed the Council's information management arrangements in supporting robust and effective decision-making and improvement. Our review of information management at that time concluded that 'the Council had adequate information management arrangements in place but acknowledged, and had started, to address some weaknesses'. We came to this conclusion because:
2. The Council had adequate arrangements in place to manage information securely, although there was a minor breach in 2014. Internal arrangements included policies and procedures relating to information governance including retention and disposal policies, an information governance group, an information manager and a Data Protection/Freedom of Information officer. A senior manager was the dedicated Senior Information Risk Owner and the Council could access an information security support service through one of its IT contracts. There was an incident in 2014, involving the inadvertent disclosure of bank details. This seemed to have been dealt with quickly, and appropriate lessons learned.
3. As a result of this incident, the Council recognised the need to reinforce information security management and had taken appropriate action. It had undertaken further awareness-raising activity with staff who prepare reports. Information governance was to be included in induction training and all managers were expected to attend mandatory data-protection training. Members also received data-protection training. The Council was also developing a revised set of guidelines for committee report writers, outlining expectations and guidance regarding the format and content of reports. This demonstrated a commitment to reviewing and improving arrangements.
4. In May 2017 we undertook a follow-up review to assess the progress the Council had made to its information management arrangements. We concluded that **the Council has information management arrangements that could support improvement, but these need strengthening before their benefits can be fully realised**. We came to this conclusion because:
 - the Council has information management strategies, policies and procedures, although some are not up to date and are confusing in content;
 - the Council shows commitment to information management and recently reconstituted its Information Governance Group, but its remit is limited and the Senior Information Risk Owner is not a member of the Senior Leadership Team; and
 - the Council holds information securely and most is easily and appropriately accessible to the public, members and staff, although the ongoing failure to meet Public Sector Network standards presents a significant risk to both information security and business activity.

Proposals for improvement

Exhibit 1: proposals for improvement

This exhibit shows our proposals for improvement.

Proposals for improvement	
Information strategy	
1	<p>The Council should finalise and agree its updated Management Information Strategy. The Strategy should include:</p> <ul style="list-style-type: none">• an outline of the broad approach the Council plans to take, emphasising how Information will be used to support its strategic aims; and• a schedule of annual review and update so that developments can be responded to in a relatively short time.
Policy	
2	<p>The Council should review, clarify and rationalise its information management policy documents ensuring that:</p> <ul style="list-style-type: none">• its policy decisions and guidance follow on clearly from the overall strategy; and• its documents conform to a standard format, and are subject to regular planned reviews.
Role and profile of Senior Information Risk Owner	
3	<p>The Council should assure itself that the role of SIRO has sufficient profile, authority and accountability, with the seniority to challenge decisions made at Senior Leadership Team.</p>
Information Governance Group	
4	<p>The Council should revise the Terms of Reference for the Information Governance Group to explicitly include the task of overall scrutiny of all the factors affecting the environment within which data and information reside.</p>
PSN Accreditation	
5	<p>The Council should pursue PSN accreditation as a matter of urgency within the current financial year, bringing in external resources to achieve this if necessary.</p>

The Council has information management arrangements which could support improvement but these need strengthening before their benefits can be fully realised

The Council has information management strategies and policies although some are not up to date and are confusing in content

- 5 The Council's iCounty Digital strategy (iCounty), which it developed in 2014 to formalise and provide a roadmap for its service transformation, was ambitious in its scope and aspirations. However, it did not clearly specify how the strategy would help the Council transform business delivery through the management of information. The Council reviewed its iCounty Digital Strategy in 2016, and it now covers the period 2016-19. In March 2015, the Council updated its Information Strategy, originally produced in 2009. The Information Strategy covers all paper based and electronically held information and, although not explicitly linked to the iCounty Digital Strategy, states that its aim is: 'to promote the effective management of information as a corporate resource, leading to improvements in services for citizens.'
- 6 An Information Strategy, supported by action plans, would normally set out how a council will achieve its information management aims and objectives. Information policies would normally define the parameters or rules within which a council expects members and officers to work when managing information, both digital and paper based. At the time of our review, Monmouthshire County Council's Information Management Policy (2016-19) described some specific actions it will take to improve management information, but these were absent from its Information Strategy. For example, the Information Strategy referred to the use of electronic data record management systems but did not explain whether the Council aims to reduce reliance on legacy systems and, if so, how it might achieve this and by when, so that it can measure progress in delivery.
- 7 The Council's Information Strategy was due for review in March 2017 but, at the time of our review in May 2017, it was not complete. The 2015 version of the Information Strategy was no longer fit for purpose as much had changed in the information management field in the intervening years. There was a risk that delaying the update of the Information Strategy further would hinder delivery of the Council's corporate objectives. For example, the lack of refreshed strategic aims and objectives would make it difficult for the Council to target resources effectively and measure improvement in the management of information. We understand that, since our visit to the Council, the information strategy has now been updated,

amalgamating previous strategies, and aligning with the themes of the service improvement plan. It was scrutinised, agreed and adopted (in October 2017) although we have not yet reviewed it.

- 8 The Council's Information Strategy is supported by its Agile Working Project. The project was initially a response to issues of accommodation and demand for new working patterns but it also had implications for how staff need, access and use information. The project has acted as a catalyst for the Council's transformation, bringing digital issues to the fore, and stimulating demand for business transformation at all levels, with many staff benefitting from easier access to IT systems and data.
- 9 Following on from the Agile Working Project, the Council's Digital Programme Office is conducting a digital review. The Council intends this review to provide a baseline for current use of digital technology in managing information, to help inform many of the Council's strategies and provide indicators against which to measure progress.
- 10 The Council is engaged in a strategic partnership for the delivery of information technology with the Shared Resource Service (SRS)¹, which includes information management. Our interviews indicated that the SRS is broadly popular with Council staff, providing some savings in terms of economies of scale and better access to expertise when required. At the time of our review, an up to date service level agreement defining the working arrangement between the SRS and the Council was not yet in place, although user groups provide feedback to the SRS on its services by attending SRS user groups.
- 11 The Council has a Digital and Technical Business Plan, covering the period (2016-2019), that provides details of immediate priorities for action for 2016-17. At the time of our review only the final section on risk covered the period beyond 2016-17, although staff explained that the Council was reviewing its Information Strategy.
- 12 Overall, the Council's information management planning and policy documentation lacked the appropriate flow and coherence of a golden thread from strategic to operational, to monitoring and review, and was not presented in a consistent format. For example, the Information Management Policy covered strategic aims at a high level, which would be more appropriate in a strategy; timelines were fragmented (the Digital Programme Office Business plan for 2016-19 only covers the period 2016-17); and some documents such as the Information Strategy itself

¹ The Shared Resource Service (SRS) describes itself as a collaborative technology provision in South Wales that provides technology services to the public sector. Current partner organisations of the SRS are Gwent Police, Torfaen CBC, Blaenau Gwent CBC and Monmouthshire CBC. The SRS currently has two strands to its service provision:

- the Shared Resource Centre in Blaenavon that houses a data centre capability used by partners and the wider Welsh Public Sector; and
- the Shared Resource Service which is an integrated technology team that provides IT services to partner organisations.

were still under development during our review. These documents did not sit alongside and support the Council's overall strategic approach to information management.

- 13 At the time of our review, in May 2017, the Council's plans to comply with the General Data Protection Regulation (GDPR) were progressing and built on much work done in the area of data protection over the past 4-5 years by its Data Protection Officer. The Council's staff we spoke to during our review were aware of the Council's incident reporting procedure. The procedure can be accessed via the Council's intranet, known as 'The HUB'.
- 14 The Council is signed up to the Wales Accord for Sharing Personal Information (Waspi) and many individual protocols are in place within service departments under this umbrella.

The Council shows commitment to information management and recently reconstituted its Information Governance Group, but its leadership and remit do not match best practice

- 15 The Head of People and Information Governance is the Council's appointed Senior Information Risk Owner (SIRO). Having the SIRO as a member of the Senior Leadership Team (SLT), independent of the delivery of IT services, is good practice. This gives the SIRO sufficient profile and authority to challenge decisions made at that level, and ensure accountability for information management, in line with the requirements of international standards such as ISO 27001². However, in Monmouthshire County Council the SIRO is not a member of its SLT and so the Council needs to assure itself that this does not hinder the SIRO from effectively undertaking their role.
- 16 The Council has an established Information Governance Group (IGG), re-established in May 2017 with new Terms of Reference. Membership includes the SIRO and other relevant senior staff. The Terms of Reference describe the role of the IGG as covering implementation, monitoring and review of strategy and policy around information management as well as to promote good working practices and support culture change towards data-led decision making and service redesign.
- 17 We would expect the Council to have a group that covers the function of an Information Security Management Forum, as defined in the ISO 27001 standard. The Council needs to be aware of all of the factors affecting the environment within which data and information reside, and a group delivering this function would fulfil that need. By having such a group, that was effectively discharging these responsibilities, the Council would have assurance that appropriate arrangements were in place to respond to all information breaches or potential breaches with appropriate mitigating action, monitoring and evaluation. The SIRO would then be able to use the group to fully evaluate the risk the information asset poses to the organisation and therefore support completion of the section on information assets in the Council's Annual Governance Statement. Although the Information Governance Group covers some of this remit in practice, this is not clear in its Terms of Reference.

² ISO27001 is an international standard for Information Security, published by the International Organization for Standardization and the International Electrotechnical Commission. It provides comprehensive best practice guidance for managing the security of information held by organisations, as well as a route to the formal accreditation of this.

- 18 The Council has approximately 40-50 digital champions in place across its directorates. These posts were formerly Information Management Champions/Representatives, but since then they have evolved into digital champions and have a wider more integrated remit covering both the dissemination of information and guidance for staff, and receiving feedback on the performance of digital and information services.
- 19 The Council has made induction training on Information Governance issues mandatory for all staff, including for those not based within the main offices, and there was evidence of a renewed appetite amongst staff and members for refresher training, including 148 requests as at May 2017.

The Council's information assets are, for the most part, easily and appropriately accessible to the public, members and staff, although the ongoing failure to meet Public Sector Network standards presents a significant risk to both information security and business activity

- 20 The Council has a website, available in both Welsh and English languages. It is clearly set out and provides links to the various services provided. Information is readily available to citizens and staff of Monmouthshire through the Council website.
- 21 The Council has supplemented its website with a mobile phone app, available on most mobile phone platforms. Whilst we have not reviewed these facilities in any technical depth as part of this review, they appear to provide citizens with quick and easy access to information about the Council and its services.
- 22 Council staff and members have access to the Council's intranet, known as the HUB, which is based on Microsoft Sharepoint. It is particularly popular with the staff we interviewed who mostly reported that it was effective and has had a transformative effect, allowing much easier remote working, collaboration and access to information. However, some of the Council's data which is not easily available via the HUB is held in specific legacy systems. These legacy systems are generally older systems, often designed for a very specific purpose, that save their data in a closed environment and lack compatibility with modern software such as that on which the HUB is built.
- 23 As part of the Auditor General's 2016-17 financial opinion work, our review of the SRS premises, in 2016, indicated that a comprehensive set of security and availability controls were in place. We concluded that because many industry standard resilience controls were in place, alongside robust backup and recovery arrangements, there was a very low likelihood of the councils involved in SRS experiencing service interruption or data loss.
- 24 The Council has informed the SRS of its priority systems that support the more critical public services that would require the greatest support in the event of any IT disruption. The SRS would need to consider these alongside similar lists from other SRS partners, so that it could prioritise competing demands for its limited resources.
- 25 In the longer term, the Digital and Technical Services Business plan (2016-19) indicates that Monmouthshire Council plans to reduce the number of legacy systems replacing them with systems designed for operation in a shared service environment, which has the potential to greatly reduce this risk.

- 26 During 2016, Monmouthshire Council failed to achieve Public Sector Network (PSN) accreditation which is essential for connection to government services such as DWP Housing Benefit Claims. The Council had not, at the time of our review in May 2017, achieved this PSN accreditation, and we understand has still not. Without this accreditation, the Council can not connect to Government services such as DWP but this could have significant financial and business impacts potentially affecting the provision of some benefits such as Housing and Council Tax. The Council needs, therefore, to pursue PSN compliance, bringing in external resources to achieve this if necessary.

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