Information Management Policy
December 2018

Key Information

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Section/Directorate:	Policy Team
Service Impact Assessment:	N/A

External Consultation:	N/A
Internal Consultation:	GDPR Working Group Key officers involved in development of Policy throughout process
Background Information:	Information Principles for the UK Public Sector, HM Government Information Sharing Protocols, ICO Whole Essex Information Sharing Framework

Policy Approval – Officer Level	Paul Burkinshaw, Assistant Director – 6 November 2018
Policy Approval – Member Level	Policy Oversight & Strategy Committee – 13 December 2018 (scheduled for consideration)

Policy Review Date:	December 2020
Service Impact Assessment Review Date:	December 2020

Content

1.   Introduction

Basildon Council holds and processes a range of information about the people, places, events and businesses of the Borough, including staff who work with and on behalf of the Council. This information enters the Council from a variety of sources, including from other partner agencies. Essentially, the council cannot provide services to its residents and stakeholders without the collection, use, and disposal of information.

This policy recognises information as an intrinsic and valuable asset to the Council. It can provide knowledge and evidence which in turn can be used to inform Council policy and decision-making. Additionally, the ability for the organisation to meet and deliver the needs of the Borough in the future will depend increasingly on how well information is managed and how effectively it is used. For this reason, a robust structure of policies and procedures underpin this policy and are necessary to reflect the value of this asset, with the aim that it continues to be viewed in high regard across all departments, services and customers alike.

An effective policy should set out a clear rationale for the collection, processing, and destruction of information. Adopting a clear framework is vital to facilitate the successful sharing of information, both internally and externally, as well as the appropriate processes for the management of data. Additionally, this framework will lay the foundations for our information management practices to be transformed or expanded, as necessary.

2.   Executive Summary

Information governance is an essential component of organisations across all sectors. Data protection laws[1] implemented in 2018 have been key drivers in developing an updated, rigorous policy to guide the organisation in the management of the information it collects and processes. Both the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 have given individuals greater control over their personal data, whilst also promoting principles and safeguards that the Council will implement and promote. Moreover, the Freedom of Information Act 2000 and the Local Government Transparency Code 2015 provide regulations allowing public access to information held by public authorities and set out the minimum data that local authorities should be publishing, as well as guidelines for this.

Basildon Council is committed to the implementation of good Information Management practice. This will help ensure that data is consistent and appropriately confidential, whilst also maintaining integrity and availability of data across all levels of the workforce. Appropriate guidelines and training will be available for all officers regarding the management of both physical and electronic information assets held by Basildon Council, in line with the requirements of this policy.

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[1] General Data Protection Regulation (GDPR) and the Data Protection Act (2018), have updated data protection laws and privacy regulations for individuals within the European Union and the United Kingdom.
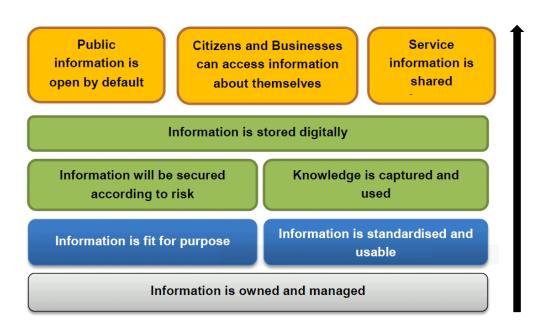
3. Policy Statement

Basildon Council will collect, share and utilise relevant, minimum and appropriate information in a safe, lawful and consensual way, in line with national legislation. It will ensure shared responsibility across the organisation to manage information correctly, thereby safeguarding our customers' rights and ensuring a valuable corporate asset is utilised effectively.

4. Information Management Approach

This policy outlines Basildon Council's approach to information management and data handling. It provides the guiding principles and assurances necessary to govern the activity of information management, as well as the promotion of the positive use of information that we collect and store as an organisation. Supporting codes of practice, procedures and guidelines provide further details and establish the Information Management framework, which will sit beneath this policy document.

Information Management Principles

Basildon Council will be guided by the 'Information Principles for the UK Public Sector[2]', as set out below, while prioritising and making these specific to our organisation and services:

Basildon Council will progress towards these principles using our infrastructure, policies and available capacity, when and where it is appropriate. Ensuring all staff understand the principles and their responsibilities will help to ensure corporate information is handled and processed appropriately. This is of utmost importance as a failure to adequately secure information increases the risk of financial, reputational, and opportunity losses for the Council.

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[2] 'Information Principles', HM Government, December 2011

Information Management Framework

A framework of supporting documents (policies, procedures and guidance) sit beneath this policy and work to address different aspects of our information governance, ensuring the organisation manages information appropriately.
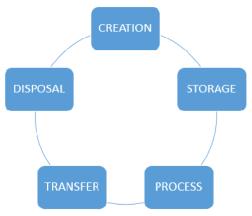
The council recognises the importance of **information as an asset**, the need for effective **records management,** and respects the **information rights of the individual.** This is all underpinned by effective **compliance** measures. These aspects are summarised in the following sections;

Information as an Asset

Basildon Council recognises that data is an important asset that can be used to better understand the needs of the community and service provision. Data should be understood, recorded, valued, protected and utilised like other organisational resources. Therefore, Basildon Council will use data as a way of designing service, developing policy, and providing the best possible value for our customers and residents. By continuing our commitment to the Whole Essex Information Sharing Framework (WEISF) and the Digital Online Partnership, the Council is well equipped to share and utilise data with relevant partners, ultimately adding to the delivery of effective and efficient public services, which can be coordinated around identified need.

Records Management

All information follows a life cycle that needs to be reflected in the governance arrangements in place within an organisation.

Information Life Cycle

Basildon Council will adhere to the seven governing principles set out by the Information Commissioner's Office (ICO)[3] as well as the Information Sharing Protocols published by the ICO[4]. These principles relate to the creation, storage, processing, transfer, and disposal of information and are listed below:

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[3] https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/principles/
[4] https://ico.org.uk/media/for-organisations/documents/1068/data_sharing_code_of_practice.pdf - the data sharing code of practise is yet to be updated by ICO in respect of the Data Protection Act 2018

- **Lawfulness, fairness and transparency**
- **Purpose limitation**
- **Data minimisation**
- **Accuracy**
- **Storage limitation**
- **Integrity and confidentiality (security)**
- **Accountability**

Information Rights

Residents expect their information to be held and processed responsibly, and individuals need to feel secure providing their information with the confidence that it will be protected and safeguarded in accordance with statutory legislation. Due to this, Basildon Council recognises the rights of individuals in respect of their information with the following ICO standards that will apply to all data subjects the Council engages with[5]:

1. **The right to be informed**
2. **The right of access**
3. **The right to rectification**
4. **The right to erasure**
5. **The right to restrict processing**
6. **The right to data portability**
7. **The right to object**
8. **Rights in relation to automated decision making and profiling.**

More information on data management and further detail related to information security can be found in supporting documents, most notably the Privacy Policy[6], which expands on this document and provides more information about definitions, principles, roles, responsibilities and legal requirements.

Compliance

Through effective information management, Basildon Council will comply with the following obligations:

- Data Protection Act 2018
- General Data Protection Regulation (GDPR) 2018
- Freedom of Information Act 2000
- Local Government Transparency Code 2015
- Environmental Information Regulations 2004
- Acceptable Use Policy
- Public Records Act
- Civil Service Code
- The Government's 'Information Principles for the UK Public Sector'
- The Information Sharing Principles from the Whole Essex Information Sharing Framework

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[5] https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/
[6]

- The Equality Act 2010: Public Sector Equality Duty

This policy is applicable to and will be communicated to, all Basildon Council staff, contractors, stakeholders, suppliers and third parties who interact with information held by the Council and the information systems used to store and process data. Employees are responsible for ensuring that they understand their responsibilities as defined in this policy and the supporting framework. Line managers are responsible for ensuring that all Basildon Council staff and contractors understand their responsibilities as defined in this policy and that they continue to meet its requirements for the duration of their employment. Furthermore, it is the line manager's responsibility to take appropriate actions if individuals fail to comply with this policy and the guiding principles.

Further information can be found in the Roles and Responsibilities Guidance, which outlines the roles and responsibilities associated with governance and management of information held by the Council. This includes information about data owners, data controllers, data processors, data protection officers, line managers, the chief information officer, information governance manager and more.

5. Council Promises

The table below provides a visual display of how this Policy will impact on the delivery of the Council's corporate plan promises.

Corporate Promises 2018	Levels of Impact			
	High	Medium	Low	None
1. A place where people are happy, healthy and active		X		
2. An attractive and welcoming place that people are proud to call home			X	
3. A place that encourages businesses to grow and residents to succeed		X		
4. A Council fit for purpose and able to deliver	X			

6. Outcomes and Priorities

This policy seeks to achieve the following Outcome and Priorities:

Outcomes:

1. Full compliance with current legislation and updated best practice guidelines in relation to information management at Basildon Council
2. Establishment of a clear information management framework for future mapping of supporting policies, procedures and guidance
3. Public confidence in the Council's approach towards information management and data sharing

4. Embedding of the principle that information is an asset, and therefore understood, recorded, valued, protected, utilised and disposed of suitably.

Priorities:

o Reduction in legal challenges posed to the Council based on a failure to adhere to data sharing and information management legislation
o A triangulation of the Council's digital transformation strategy, IT strategy and Information Management Policy Framework, ensuring mutual compatibility and collaborative working, enabling strategic alignment within the Council
o Developing awareness in regards to the associated statutory and regulatory requirements and responsibilities for information management
o Improved decision-making, policy formation, and general governance through the provision and utilisation of shared information

7. Links to other Corporate Policies or Partner documents

- ICT Security & Acceptable Use Policy
- Digital Strategy
- Corporate Plan
- Privacy Policy
- Roles and Responsibilities (GDPR Guidance)

8. Glossary of Terms

- **Controller** – A person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Data Protection Officer** – Under the GDPR, some organisations need to appoint a data protection officer who is responsible for informing them of and advising them about their data protection obligations and monitoring their compliance with them.
- **Data subject** – The identified or identifiable living individual to whom personal data relates.
- **Framework** – The structure of supporting policies, procedures, strategies and guidelines that will underpin information management. These will be refreshed and updated when necessary.
- **Personal Information** – Any information relating to a person (a 'data subject') who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.
- **Processing** – In relation to personal data, means any operation or set of operations which is performed on personal data or on sets of personal data (whether or not by automated means, such as collection, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure, dissemination, restriction, erasure or destruction).
- **Processor** – A person, public authority, agency or other body which processes personal data on behalf of the controller.

- **Records Management** – the administration of records and documented information for the entirety of its lifecycle.

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