Information Management (IM) Strategy

Owner: Peter Kennedy, Welsh Government SIRO
Issue Number: 1.0

Date: June 2016
Next Major Review Date: June 2019

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WHO IS THIS STRATEGY FOR?

All employees of the Welsh Government need information every day in order to do their jobs – the Welsh Government cannot function or meet its objectives without it. This strategy isn't just for those working in "information roles": it is for all Welsh Government staff – for every role, every grade, in every part of the organisation. It outlines what 'we' as Welsh Government staff need to do to manage our information better and support the Welsh Ministers.

Achieving perfection in managing information is beyond any large organisation; we must therefore concentrate on information that is likely to be of value.

We must comply with the law, in particular the four main Acts covering the way that we manage and use information in the Welsh Government:

- The Public Records Act
- The Data Protection Act
- The Freedom of Information Act
- Information Environmental Regulations
- The Official Secrets Act
- Public Sector Information Regulations

We must also comply with overall Government policy and guidance, in particular:

- Security Policy Framework
- Code of Practice on the management of records
- Information Commissioner's Guidance

WHAT IS THIS STRATEGY ABOUT?

This strategy aims to provide a framework around managing our information throughout its lifecycle. It aligns with the Information Principles http://www.nationalarchives.gov.uk/information-management/manage-information/planning/information-principles/ and with the goals of the Welsh Government's Programme for Government (PfG) http://wales.gov.uk/about/programmeforgov/?lang=en and Welsh Government Departmental Business Plans.

This strategy replaces the "Knowledge and Information Management Strategy 2012 – 2015".

Related Strategies

Welsh Government's ICT strategy
The Welsh Government employs an "intelligent client" methodology where business needs are identified by departments and submitted to the Solutions Design Authority (SDA) via an ICT Project Approval Form (IPAF) for approval.

Section 14 of Reference B, "What Measures Need to be Put in Place when Using New Systems?", mandates that the Information & Records Management team will be informed of new project areas via the IPAF process and that it will enter into discussions with the project to ensure that information requirements are met. This includes access to current records during their lifetime and where appropriate continues to be accessible for future generations.

Related policies

Information and Records Management Policy
https://documents.hf.wales.gov.uk/id:A14413875/document/versions/published

Digital First: Putting digital at the heart of public services in Wales
http://gov.wales/docs/det/publications/150421-digital-first-en.pdf

Security Policy
https://documents.hf.wales.gov.uk/xclient/id:A879090

Information Security Policy
https://documents.hf.wales.gov.uk/id:A9478770/document/versions/published

Information Security Management System (ISMS) Operational Policy
This applies to staff responsible for the management and operation of the Welsh Government's Information Security Management System (ISMS).
http://intranet/English/Information/Protecting/Security/Pages/ISMSOperationalPolicy.aspx

SIRO Risk Appetite Statement
https://documents.hf.wales.gov.uk/id:A9407465/document/versions/published

Social Media Policy
https://documents.hf.wales.gov.uk/id:A729749/document/versions/published

Supporting information

Government of Wales Act 2006 http://www.legislation.gov.uk/ukpga/2006/32/contents

Freedom of Information Act 2000 http://www.legislation.gov.uk/ukpga/2000/36/contents

New Freedom of Information (Release of Datasets for Re-use) (Fees) Regulations 2013
http://www.legislation.gov.uk/uksi/2013/1977/contents/made

Freedom of Information Act: your responsibilities and obligations - Information
Commissioner's Office
http://www.ico.gov.uk/for_organisations/freedom_of_information.aspx

Freedom and rights - Ministry of Justice
http://www.justice.gov.uk/guidance/freedom-and-rights/freedom-of-information/index.htm

Data Protection Act 1998 - Information Commissioner's Office
http://www.ico.gov.uk/for_organisations/data_protection.aspx

Public Records Act 1959 & 1967;
http://www.legislation.gov.uk/ukpga/Eliz2/6-7/51 &
http://www.legislation.gov.uk/ukpga/1967/44

Environmental Information Regulations (EIR);
http://www.legislation.gov.uk/uksi/2004/3391/contents/made

The Re-use of Public Sector Information Regulations 2015
http://www.legislation.gov.uk/uksi/2015/1415/pdfs/uksi_20151415_en.pdf

Copyright, Designs and Patents Act 1988;
http://www.legislation.gov.uk/ukpga/1988/48/contents

Constitutional Reform and Governance Act 2010
http://www.legislation.gov.uk/ukpga/2010/25/contents

Protection of Freedoms Act 2012
http://www.legislation.gov.uk/ukpga/2012/9/contents/enacted

Statistics and Registration Service Act 2007
http://www.legislation.gov.uk/ukpga/2007/18/contents

Government Statistical Service (GSS) codes
 https://gss.civilservice.gov.uk/about/code-of-practice/

Quality Management Strategy
www.wales.gov.uk/statistics-and-research/about/statement-of-compliance/quality-management

Foreword by Permanent Secretary

The Welsh Government cannot operate without information. Good quality decision making relies upon it. Whilst we may often find we are drowning in information, we need to be confident that the underlying information and data are up to date, accurate, delivered in a timely manner and in a format that is usable.

Much has changed since we published our previous strategy (Knowledge and Information Management Strategy 2012 – 2015) both within the Welsh Government and the National Assembly for Wales. This refreshed Information Management Strategy sets out our approach to managing our information to achieve the right balance between managing information and making information more widely available to the public, whilst ensuring that adequate protection is in place.

Technology can and must be used to transform the delivery of our public services. Making the fullest possible use of the opportunities technology offers will help us to be more efficient, cut the cost of delivery, and make the public sector a better place to work.

This strategy also aims to address the recommendations for improvement made by The National Archives in their 2014 Information Management Assessment report. We have not been using our content assets enterprise repositories such as iShare, our EDRMS, in the most effective way possible. How effectively we handle our information and keep records has a direct impact on our ability to support Ministers and to deliver vital services to the people of Wales.

We also need to provide better services and information to our customers and re-use information received from them. It is essential that we sustain our focus on these important elements of information management so that we can deliver for the people of Wales.

All managers, especially Senior Civil Servants, shall model the behaviours and culture that ensures information is valued, protected and used for the public good. Managers shall encourage their staff and stakeholders to identify risks.

The changes to the constitutional and democratic landscape that are opening up right now offer us a huge opportunity to develop public services the 'Welsh way'. We must remember that the information and records we create now will be invaluable information resources in the future.

As Chief Accounting Officer, this strategy has my full support and that of our Board members and our Senior Information Risk Owner (SIRO).

Sir Derek Jones
Welsh Government Permanent Secretary

Contents

Introduction

Information is needed to inform policy development and make evidence-based decisions, as well as to ensure accountability to the National Assembly for Wales and the Welsh public. At an operational level, information can be used to drive efficiency and service improvement - enhancing public services, while at the same time reducing waste and improving value for money.

Information comes in many forms – policy documents, research papers, minutes, statistics, operational data, images, photographs, databases, datasets, personal data – and is held in a variety of printed and electronic formats. Across the Welsh Government we use this information in our daily working lives as we work to achieve our own objectives and those of the Welsh Government - whether it be delivering services, formulating policy, drafting legislation, holding meetings or managing staff.

To maximise the potential benefit from our information we need to manage it effectively, through its lifecycle[1], re-use it where we can, share it appropriately and ensure that it is adequately protected. Past experience has shown us that this does not always happen – information that is not managed properly may be lost, shared with the wrong people or not found at all.

Good information management is crucial to the work of the Welsh Government. The Information Management (IM) strategy aims to provide a framework around managing our information throughout its lifecycle and to give a focus which has hitherto been missing. It also describes the actions that are underway or planned to further develop our information management capacity.

The strategy recognises that local IM strategies and policies may exist within business areas but it is expected that these will be aligned with this over-arching Welsh Government IM strategy and the Welsh Government's plan of action for the 2016-2021 Assembly term. It represents a commitment to delivery, measured by the impact government is actually having on people's lives.

Improving the way we manage our information brings a number of benefits both to the individual and to the Welsh Government

Good information management provides the individual with the following benefits:
- finding the information you need quickly and easily;
- knowing what you need to keep and what you can dispose of – removing duplication and the "I'll keep it just in case" approach;
- knowing where to keep it and how to save it;
- working more efficiently, making best use of resources – re-using information created by you or others and not re-inventing the wheel;
- working more collaboratively – making best use of skills and knowledge;

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[1] The Welsh Government uses an eight stage lifecycle: Create, Assure, Use, Store, Access, Share, Publish and Dispose.

- knowing what you can share and with whom;
- knowing what information needs to be protected and what should be made available to the public; and
- providing assurance that risks are reduced and that you are complying with your responsibilities under legal requirements.

Good IM provides the Welsh Government with the following benefits:
- enables us to provide a more effective service to stakeholders and the public with greater transparency around the information we hold;
- preserves our reputation with the public and enables us to meet expectations of how we will manage their information;
- builds trust in the quality of our information both for staff and the public;
- supports informed decision and policy making;
- ensures compliance with legal requirements;
- preserves for the public record decisions being made now which will become our future history;
- increases our efficiency by enabling us to get the most out of the information we hold and to re-use it, which prevents us having to start all over again each time;
- reduces levels of information-related risk and ensures that our information is protected and secure;
- provides confidence and assurance to Senior Information Risk Owners (SIROs) that we are managing information risk in the department; and
- through the role of Information Asset Owners (IAOs), ensures that we are aware of our information holdings.

Good IM in the Welsh Government provides the Welsh public with the following benefits:
- delivers more efficient, cost effective services;
- ensures that we make the best use of information;
- increases the transparency of our data, enabling the public to participate in decision making;
- increases understanding of what the Welsh Government does;
- enables the public to engage and collaborate with the Welsh Government in achieving its aims;
- enables the public to hold the Welsh Government to account.

Welsh Government Context

The Welsh Government is responsible for proposing and implementing policy and laws which apply to Wales and which aim to improve the lives of everyone in Wales. It is supported by staff based in offices throughout Wales.

Our Information Management Strategy sets out our approach to managing our knowledge and information to achieve the right balance between making information more widely available to the public, whilst ensuring that adequate protection is in place.

This Information Management Strategy explains how the Welsh Government is addressing the government's Information Principles to help meet its objectives through more effective policy making, delivery of our programmes, services and operations and to develop Welsh laws.
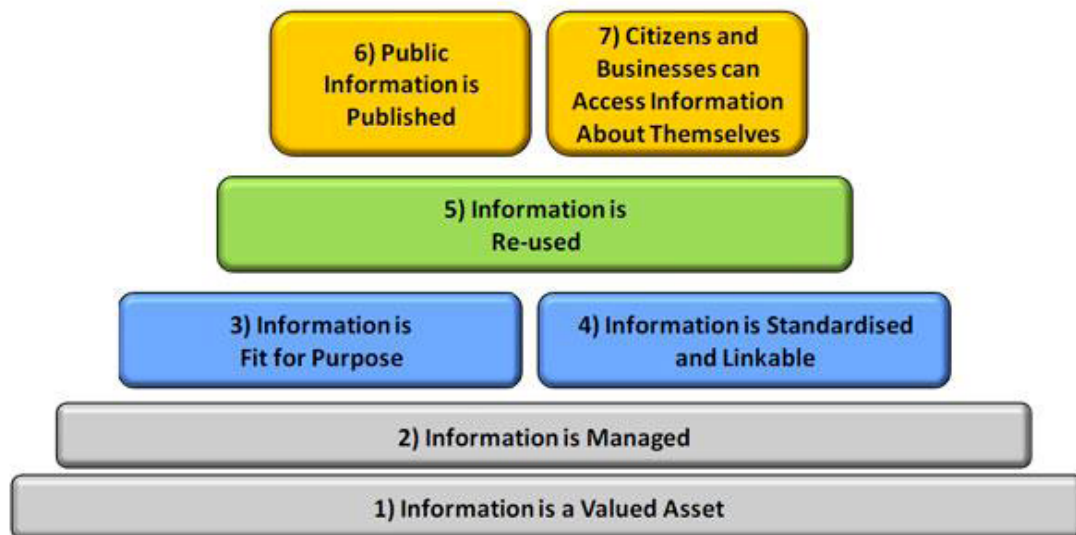
The Strategy is part of a suite of inter-related strategies that set out how the Welsh Government is addressing cross-government and Welsh public sector requirements. It reinforces how we are managing the information and data we create across our business activities and how we plan to further develop our capability, processes and systems. It will be reviewed annually to establish any updates that are required.

It is important to note that all of the legislative requirements underpinning this strategy stem from UK-wide (non-devolved) legislation, and from European legislation. Welsh Government may influence the development of new legislation in these areas through submission to public consultations, but we hold no law making powers in these matters.

2.1 Information Management Assessment (IMA)

The National Archives (TNA) undertook an Information Management Assessment in March 2014. This recognised the Welsh Government's good practice in three of the five areas assessed in the
Information Management Assessment: A Review of Good Practice from the IMA Programme 2008-14 report.

An Action Plan was agreed with TNA to address weaknesses in the areas of "Information risk, governance and oversight". Information risks and their impact on the Welsh Government, as well as support for legacy data and records and digital continuity, have also been addressed.

2.2 Information Management (IM) Maturity Model

Annex 1 contains a set of indicative criteria for each of the ten headings under which The National Archives assesses organisations, progressing through four different levels of maturity. These criteria will be used to measure our progress and help to demonstrate recognisable benefit in line with business objectives.

2.3   ICT Strategy

Within a clear governance framework ICT will bring value to WG by enabling both the corporate body and departments to meet their information management needs through an ICT organisation that has the customer interests at heart and identifies innovative solutions to meet business needs.

The Welsh Government's Information Management (IM) Vision

"The Welsh Government aims to create, assure, use, store, access, share, publish and dispose of information through systems and processes that are aligned with legislative requirements and the needs of transparency and supported by effective policies, procedures and guidance."

We will achieve our IM vision by:
- sharing and re-using systems and technology;
- joining-up information flows and processes;
- exploiting and enabling re-use of information;
- complying with legislation and regulations.

The next section sets out a framework of government-wide Information Principles under which we have identified a number of actions that we will take to create the environment necessary to manage, exploit, make available and protect corporate information. Many of these actions overlap with our Information Management Assessment (IMA) Action Plan

3.1   We value information as an asset

> *"It is important that information is valued as an asset and managed, protected and exploited throughout its lifecycle"*

3.1.1 Key tools and sources of information

- Open Data Strategy (including the Publications Scheme and Publications Catalogue)
- iShare, our corporate electronic document and records management system
- SAP, our finance system
- WEFO Programme Information Management and Monitoring System (PIMMS)
- CMS is CAFCASS Cymru's electronic Case Management System.

- Information Asset Registers (IARs)
- Information and Records Management Policy
- HM Government Security Classifications
- [Digital Continuity Strategic Overview](#)

3.1.2 How we are meeting the requirements

Declaration from the organisation to establish the importance of information to the business

This Strategy recognises the value of Welsh Government corporate information and how it contributes to meeting the overall objective of implementing policy and laws to improve the lives of everyone in Wales through our programmes, policies and services. Together with our Open Data Strategy, it recognises the need to exploit such information more widely for the benefit of the Welsh public, our partners in WGSB and Welsh Local Authorities.

Governance Statement and Internal Control Questionnaire (ICQ)

The Governance Statement is one of the major pieces of work which supports the Permanent Secretary, as Principal Accounting Officer, in making his declaration within the Welsh Government's annual accounts as to how he has discharged his responsibility to manage and control the resources used in and by his organisation.

In support of the Permanent Secretary, and his Governance Statement, each Director General (DG) is required to undertake a review of internal controls operating within their directorates and report the results in a Statement of Assurance for all of their departments at the financial year end. A proforma statement is provided for this purpose.

An Internal Control Questionnaire (ICQ) has been developed to facilitate this review of the controls operating in each directorate and to assist the Directors General in the completion of their statements. Guidance notes to help with the completion of the ICQ are also provided. Assurances will need to be obtained from across each directorate and it is advisable for each division to provide their own Statement of Assurance based upon the ICQ. A proforma statement is provided for this purpose.

Each DG's Statement of Assurance and ICQ return should be subject to scrutiny and challenge by the DG's Corporate Governance Committee (DG CGC). In particular, the Committee should advise the DG of any control issues that it considers are significant and require disclosure in the [Statement of Assurance](#).

Knowledge assets are owned and catalogued and their value to the organisation is known

All IAOs are responsible for producing quarterly Statements of Assurance in their respective areas, with their Group covering the performance of his/her staff in key areas that include compliance on information systems, record keeping and data security e.g. iShare, transparency and data protection.

Defined approach for consistently identifying, categorising and cataloguing information assets and their usage

We operate an Information Asset Register under which we manage each information asset as a single unit to ensure that it is understood, shared, protected and exploited effectively. Each information asset is assigned to a senior Information Asset Owner (IAO) who must have the required training and understand the nature and purpose of the asset. They are assigned responsibility for monitoring the usage, addressing the risks and ensuring the asset is fully used for the public good. They are accountable on an annual basis to the Senior Information Risk Owner (SIRO). Guidance is available in relevant sections of our intranet, "Connect".

We give high priority to transparency as part of the way we work in the Welsh Government. We publish information for re-use on our website and Online Publications Catalogue

We aim to publish data to 3* and the aim is to get the most used datasets on StatsWales to 4* in the next few months. Initiatives are under way aimed at releasing new data and making it easier for others to use.

We publish detailed official data for Wales on https://statswales.wales.gov.uk/Catalogue.

Established framework for assessing and recording the value of information assets

Our Permanent Secretary made a commitment in the Welsh Government's Information Management Assessment by TNA to "strengthen information risk management, digital continuity and oversight".

IAOs are accountable for confirming to the SIRO that new assets have been included on the Register, business impact and digital continuity have been assessed and management arrangements have been put in place. They must show that consideration has been given to using information assets for the public good and reviewing the information on the Register to ensure it is accurate and up-to-date.

Adequate capacity and budget are secured to deliver our information management priorities

Budgets for information management activities are discussed during the later stages of the previous financial year. The decision about the budgeted amounts is based on an assessment of need to spend, particularly in regards to contractual commitments but also critical services.

3.1.3 Future plans
- We will seek to reconfirm the commitment of the Permanent Secretary and the Deputy Permanent Secretaries to the importance of information management

and compliance by implementing the recommendations in Sir Alex Allan's Reviews[2] to help ensure the long term integrity of Welsh Government records.

- We have secured funding for an "Information & Records Management project" locally known as "Improving iShare" to exploit the unused functionality in our EDRMS, iShare and to tackle complexities in the way it is used. The project will also investigate the options around electronic record capture for EU projects and pilot one or more options to tackle information stored in legacy personal and shared storage areas (H: and P: drives). An e-Discovery software tool which would improve our ability to identify and extract records for action (e.g. technically assisted sensitivity review of digital records and transfer to The National Archives) will be considered. This will allow a more flexible approach to redeveloping our corporate file plan.

- We will ask Internal Audit to review the Welsh Government's performance against the UK government's Information Management (IM) Maturity Model to measure progress.

- We will continue to participate in the The National Archives on-going Information Management Assessment (IMA) programme (http://www.nationalarchives.gov.uk/information-management/manage-information/ima/information-ima-members/).

3.2   We manage our information

> "Information needs to be governed with regard to legal requirements and based on a consistent approach to risk assessment. Organisational roles and responsibilities should be in place, and skills and capabilities developed."

3.2.1 Key tools and sources of information
- Divisional Information Asset Registers (IAR)
- Divisional Risk Registers
- Welsh Government Corporate Risk Register
- Information & Records Management Policy
- Email Policy
- Information Security Policy
- Social Media Policy

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[2] Independent report. Government digital records and archives review by Sir Alex Allan. London: Cabinet Office, First published: 17 December 2015. https://www.gov.uk/government/publications/government-digital-records-and-archives-review-by-sir-alex-allan

- FOI Policy and Guidance
- Data Protection Policy and Guidance
- Handling Personal Information (Staff Guidance)
- Publications Scheme

3.2.2 How we are meeting the requirements

Defined approach to Information Governance

The Knowledge & Information Management and Security (KIMS) Group ensures visible and effective leadership for setting and overseeing the corporate strategic direction of knowledge, information/records management and information security within the Welsh Government.

This Group supports the Senior Information Risk Owner (SIRO) in discharging his duties and fulfils compliance requirements set out in ISO27001. The Group is also committed to good information management principles and processes defined by ISO 15489 and legislation such as the Freedom of Information Act (2000), the Environmental Information Regulations (2004), the Data Protection Act (1998) and the Re-use of Public Sector Information Regulations (2005 & 2015). The Group also provides direction and support for Information Asset Owners (IAOs).

Ensuring the delivery of the actions already agreed under the existing Email and Records project as well as developing and implementing the follow on stages (such as further reductions in storage limits and deletion rule on emails);

Establish a technology environment that supports the management, protection and exploitation of information

The Welsh Government has a corporate repository, iShare, for the storage of information that supports lifecycle management.

Significant work has been undertaken by the "Reducing Complexity: Improving Email & Information Management" Project and Implementation Board to introduce a consistent approach and exercise control over a range of corporate systems, alternative repositories and legacy holdings.

A framework for managing information through the different stages in the lifecycle

Our Information and Records Management Policy incorporates Freedom of Information requirements and Information Management Standards. The policy defines the standards by which Welsh Government records and information should be managed to ensure that vital and important records are identified. It also outlines how the Welsh Government should hold records that are necessary, sufficient, timely, reliable and consistent with operational need, and ensures that legal and regulatory obligations are met. It defines the roles and responsibilities for the creation, safekeeping, access, change and disposition of information. The policy is endorsed by our Permanent Secretary.

A central Information and Records Management (IRM) team monitor these processes with the support of Departmental Knowledge and Information Managers (DKIMS) and Records Management Support Officers (RMSOs) based in departments, regional offices and offices outside Wales.

iShare allows all staff to store and access business documents up to "OFFICIAL–SENSITIVE", including saved emails in the corporate file plan. The Departmental Records Officer (DRO) is responsible for electronic records management processes, and for the older records and information at "Restricted"/"OFFICIAL–SENSITIVE" that are still managed in traditional paper files.

Retention and disposal processes are undertaken in line with our corporate Retention and Disposal Schedule. These are based on TNA guidelines and legislative requirements. TNA guidelines for digital continuity are taken into account in our records management and transfer procedures and digital continuity is included in the corporate process for setting up new projects.

The Information and Records Management Policy sets out the guidelines for managing email and saving business emails to iShare. The Policy stipulates that all other emails be automatically deleted after one year.

Defined approach to Technology and Systems

Our ICT Division is responsible for Welsh Government's Corporate ICT Strategy, and associated governance arrangements, along with ensuring ICT services provided via the Merlin ICT contract are delivered to agreed levels of delivery and value for money.

Established framework for information risk assessment and risk management

The Welsh Government has policies that ensure we review the risks and manage and protect our data throughout its lifecycle. The policies are set out for staff on our Intranet (Connect) and are accessible on iShare. All new IT systems, and all substantial upgrades to existing IT systems, are subject to a risk assessment by our Departmental Security Unit (DSU) in accordance with HMG Information Assurance standards before they are implemented.

Information Risk is defined in our SIRO Risk Appetite Statement as that part of our overall risk portfolio which relates to the confidentiality, integrity and availability of information within the Welsh Government, in electronic and paper forms.

We recognise that it is vital to manage these risks well in order to minimise the potential impact on the Welsh Government's operations and reputation, and to protect any personal information. Wider transparency is also addressed as an integral part of our corporate Risk Register and this is monitored regularly.

Our policy for managing information risk, and evaluating the effectiveness of the measures put in place, is the responsibility of the SIRO. This is currently our HR Director. He is

supported by a Deputy SIRO, the Welsh Government Security Adviser. The SIRO is responsible for developing and implementing the policy and for regularly reviewing it.

Defined approach to ensuring legal and regulatory compliance

The Welsh Government's Accounting Officer and/or the Chief Executive has a SIRO, who in turn reports to the First Minister (FM).

The DRO, Information & Records Management team and Historical Appraisal team ensure that our information and records management procedures incorporate the requirements of the Public Records Act and other information management legislation. They work with DKIMS and local RMSOs to carry out quality assurance of our processes and provide guidance to staff on their individual responsibilities. Guidance is provided on copyright compliance by the Library.

Advice must be sought from the Information Rights Unit on compliance with the Data Protection Act, Freedom of Information and the Environmental Information Regulations. We explain on how we handle personal information to meet the Data Protection Act on our intranet: http://gov.wales/about/foi/policies/?lang=en.

Our Publication Scheme makes it easier to access our information, as required under the Freedom of Information Act.

All new IT systems which process personal data in new ways are subject to a Privacy Impact Assessment (PIA) before implementation. Guidance on the requirements for Data Protection is provided to all staff and training is mandatory for those routinely handling personal data. IAOs are accountable for ensuring that the risks of data sharing are assessed and appropriate mitigation steps taken in defined circumstances.

Our Information Sharing Policy emphasises how sharing with external partners is central to our transparency commitments but also points staff to the legislative, security and policy considerations that they need to take into account.

Skills framework/maturity model is established to develop organisational capabilities and culture for information management

A cross-government Information Management Maturity Model (see Annex 1) is used to assess information management capabilities and culture in the Welsh Government.

An eLearning module on core Information and Records Management Skills is available on our intranet.

We have developed our own KIM Professional Development Programme which aims to provide staff with the necessary KIM skills to assist them in their work. The course has been accredited by Agored Cymru.   Details   of   the   modules   can   be   found   at: http://wales.eliesha.com/CourseOutline.aspx?Course=417

3.2.3 Future plans
We will encourage staff to make better use of iShare. This will cover:

- Exploring AEC (Automatic Email Capture) which allows folders in Outlook to be linked to iShare files, reflecting the management of emails within Outlook in iShare (whilst out of scope for the RC Email & Record project, this feature will provide a simplified way for people to move email records to iShare);
- iShare Browser: WG accesses iShare via the Navigator but hold the licence to use a browser based front end which may be more user friendly. The browser may also improve resilience by offering an alternative way to access documents if the Navigator is not functioning (although not yet clear if this latter use will be possible in the WG environment);
- New Search: understanding how to get the most from the search tool has been identified as a key barrier to user satisfaction with iShare. This project will include a focus on communicating the potential of the new search facilities in iShare and when to use this and the original advanced search, plus exploring the potential to configure the new easy search to better meet WG needs.
- We will address the mismatch between individuals' requirements and integrated IT systems, and update processes that restrict information sharing practices. This will include mandating ICT/IM collaboration on all new projects.
- We will promote information management skills as part of the Civil Service Competences through our performance management process.
- We will simplify and improve the access to information management guidance that is provided to staff on the Intranet.

3.3   Information is fit for purpose in the Welsh Government

"It is important to ensure that information is of sufficient quality to meet the purpose for which it is intended. This includes both its primary purpose and also any additional secondary purposes to which it might also be put."

3.3.1 Key tools and sources of information

- Information Asset Registers
- Open Data Strategy
- ICT Strategy
- iShare, our EDRMS
- Information and Records Management Policy

3.3.2 How we are meeting the requirements

Defined approach to determining the right quality of information to meet its purpose

The Information Asset Register sets out the characteristics of each Information Asset. The owners, together with the Business Units and Information and Records Management (IRM), set the standards for those entering data and information to ensure that the primary (and any secondary) purposes are met. Approval of new projects requires quality to be addressed in Business Cases and as part of the Change Agreement Board process.

Data requirements should be clearly specified based on the information needs of the Welsh Government and data collection processes matched to these requirements. We define good quality data as follows:

Data must be…	
Accurate	Accurate enough for the intended purposes
Valid	Recorded and used in compliance with the relevant requirements
Reliable	Reflects stable and consistent data collection processes across collection points and over time
Timely	Captured as quickly as possible after the event or activity and made available for the intended use within a reasonable period of time
Relevant	Relevant to the purposes for which it is to be used
Complete	Data requirements should be clearly specified based on the information needs of the body and data collection processes matched to these requirements

The Welsh Government's Privacy Statement on the internet explains how we handle personal data.

Welsh Government staff have a duty to ensure the data released to the public is both accurate and meaningful. Efforts are under way to ensure more consistency in the approach to information quality across the different systems and processes through a more joined up approach.

We undertake Privacy Impact Assessments (PIA) to ensure that the confidentiality, integrity and accessibility of personal information are maintained.

Established processes and governance to monitor and assure information and data quality

Information and data quality is everyone's responsibility and staff must not rely on others to carry out their information and data quality responsibilities. All staff are responsible for ensuring adherence to the relevant information and data standards and for ensuring good information and data quality.

However, it is the responsibility of each IAO to identify any information assets held within their area of responsibility, and to ensure they are documented in their Department's Information Asset Register (IAR).

The Statistics team has established a Statistical Quality Committee and has a representative on the Government Statistical Service Quality Champion Network.

They hold statistical quality management and data checking training sessions for all statistical and analytical staff. They also conduct a regular programme of peer review (of statistical outputs, quality assurance plans, disclosure control risk assessments and approaches to the audit of admin data).

At the Statistics team's request Internal Audit undertook a review of the quality assurance procedures in 2014. The team has now largely implemented the recommendations which came out of the audit.

The UK Statistics Authority has recently published a [Regulatory Standard](#) for the quality assurance of administrative data used for statistical purposes and we are currently working towards meeting this standard.

Defined approach to recording the relationship between information and its supporting technology, platform and format

Ways of encouraging better data quality are considered as part of technical system design (e.g. through drop down lists or more effective reporting tools). The aim is to ensure that we provide platforms and formats that are aligned with the way the information is to be used, and this is now being assessed in terms of encouraging external use of our data as well as meeting our internal requirements. Our ICT Strategy sets out this approach.

The Solutions Design Authority (SDA) and the ICT Project Approval Form (IPAF) process set within "Related Strategies" (mentioned on page 4) provide the defined approach to recording the relationship between information and its supporting technology, platform and format.

3.3.3 Future plans
Welsh Government ICT provides and manages the "core framework" within which departments operate. Outside this "core framework" numerous systems with overlapping functionality have been developed by different parts of Welsh Government. The SDA, if allowed to utilise their authority, will apply a brake on this proliferation by directing departments to use applications that already exist within the Welsh Government estate.

We will consider the possibility of implementing an Information Quality Improvement Plan to address priority areas not already covered in the Data Quality Improvement Plan. This may include the introduction of new document templates aimed at improving the corporate record.

3.4   Information is standardised and linkable in the Welsh Government

> "The opportunities for exploiting information greatly increase when it is made available in standardised and linkable forms"

DHSS has an information standards assurance process in place. This requires departmental sponsors to make submissions to the Welsh Information Standards Board through key stages of data requirement development; Requirement Notification Development Proposal and Final Proposal. Final Proposal results in a Data Set Change Notice (DSCN) are published. This is an information mandate to the NHS. DSCNs are published on the NHS Wales Data Dictionary which can be accessed from the internet and NHS intranet. Welsh Government data requirements are also assessed in legal and common law terms by the Wales Information Governance Board

3.4.1 Key tools and sources of information
- Open Data Strategy
- ICT Strategy

3.4.2 How we are meeting the requirements

Commitment to open standards
We are committed to adopting Open Standards, wherever possible, and to promoting these in the development field. We publish data in an open, internationally agreed standard that others can reuse and repurpose. We are considering open standards for other types of information (finance, procurement, geographic etc.).

Established framework for linking information
Documentation held on the Projects Database is sourced from iShare and financial data from the SAP system and there are links between the two systems. The Ministerial Advice

Tracking System (MATS) for managing official correspondence links to documents on iShare.

Pragmatic approach for migrating to standardised, linkable data[3]
The Open Data Strategy sets out how we aim to further develop our ability to provide data in standardised, linkable formats, to enable re-use and publication in other formats.

3.4.3 Future plans
We will continue our pragmatic approach to implementing open and corporate standards and providing data in standardised, linkable formats**.**

We will put a programme of work in place to get 'consent to link' established on surveys and begin to get deterministically linkable data in.

3.5   Information is re-used

> *"The value of information can be multiplied by re-use. This requires a change of mind set – to think outside of traditional silos and proactively look for opportunities to re-use."*

3.5.1 Key tools and sources of information
- Information Sharing Policy
- Open Data Strategy
- Public Sector Information (PSI) & Public Task Statement
- Publication Scheme and Online Publications Catalogue

3.5.2 How we are meeting the requirements

Proactively offer re-use opportunities

The Welsh Government already makes its information available for re-use via its websites, http://mylocalschool.wales.gov.uk/, www.wales.gov.uk, and datasets via https://statswales.wales.gov.uk/ under the Open Government Licence (OGL).

The Welsh Government's public task statement is available at http://gov.wales/about/foi/policies/public-task-statement/?lang=en.

The Wales Accord on the Sharing of Personal Information (WASPI)

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[3] A method of publishing structured data so that it can be interlinked and become more useful through semantic queries. It builds upon standard Web technologies such as HTTP, RDF and URIs, but rather than using them to serve web pages for human readers, it extends them to share information in a way that can be read automatically by computers. This enables data from different sources to be connected and queried.

The Wales Accord on the Sharing of Personal Information (WASPI) provides a framework for service-providing organisations directly concerned with the health, education, safety, and social well-being of people in Wales.

In particular, it concerns those organisations that hold information about individuals and who need to share that information to deliver effective services.

It is a key element of the Welsh Government-led Sharing Personal Information Project which aims to make sure public services, as well as appropriate third and private sector service providers, share personal information about individuals legally, safely and with confidence.

The framework facilitates this by establishing agreed requirements and mechanisms for the exchange of personal information between service providers.

All Welsh Local Authorities, Health Boards/Trusts, Police Forces, Fire Services, a large number of charities and voluntary sector organisations have signed up to the Accord. Other organisations, such as schools, GP practices, Housing Associations and some private sector organisations have also signed the Accord.

3.5.3 Future plans

We will reflect on our new responsibilities under the revised PSI Regulations, particularly for the cultural sector.

We have published a statement of public task to set out our information trading activities clearly and concisely.

We will identify information and data we could make "open" and publish it on our websites, www.wales.gov.uk & https://statswales.wales.gov.uk/
We will look into establishing an approach for promoting information that can be re-used.

We will ensure greater consistency in licensing (Open Government Licence) across the Welsh Government. This might include applying for a Welsh Government-wide Information Fair Trade Scheme (IFTS) software licence.

3.6   Public information is published

> **"***Public information includes the objective, factual, non-personal information on which public services run and are assessed, and on which policy decisions are based, or which is collected or generated in the course of public service delivery. Public information should be published, unless there are overriding reasons not to.***"***

3.6.1 Key tools and sources of information

- Open Data Strategy
- Digital First Strategy
- Publication Scheme
- Online Publications Catalogue

3.6.2 How we are meeting the requirements

Framework in place for responding to legal obligations regarding public access to information
We have a process in place for responding to legal obligations around access to information under the Freedom of Information Act and the Environmental Information Regulations. Our Information Rights Unit provides guidance and advice and deals with enquiries about our performance in meeting the targets.

As part of our ongoing commitment to maximising openness, we have compiled an "Open Data Index" or a list of existing open data resources in relation to Welsh public services (http://gov.wales/about/foi/open-data/?lang=en).

Framework in place for proactively categorising information in terms of its relevance and suitability for publication

We maintain a Publication Scheme as required under the Freedom of Information Act. This aims to make it easy for people to access information on what we do and how we spend our budget. They can assess how well we are addressing our priorities and how we make decisions. Access is provided to our policies and procedures with links to the services that we offer.

Established channels and processes for publishing information

Welsh Government publications and research reports are initially available via the Welsh Government internet channels. Over time details of Welsh Government publications are added to the historic Publications Archive and into the Online Publications Catalogue.

The Online Catalogue helps the public to find details of items published by the Welsh Government and Welsh Office. The Online Catalogue contains a wide range of documents including circulars, statistical reports, strategies, consultation papers, research reports and technical advice notes. Most of these publications are freely available, though some of the older items may only be retrieved from our archive and therefore can only be viewed at the Publications Centre in Cardiff.

Those who do not have access to the Internet can access information and data through the First Point of Contact Centre by letter, email or telephone
http://gov.wales/contact_us/?lang=en

3.6.3 Future plans

We will review our Publication Scheme on a regular basis to ensure that it complies with changes in legislation, such as the UK implementation of Directive 2013/37/EU amending Directive 2003/98/EC on the re-use of public sector information.

3.7   Citizens and businesses can access information about themselves

> *"Citizens and businesses should be able to access information about themselves, along with an explanation of how it is used. This may be either on request or, preferably, by making it available by default. In effect, such information should be considered as belonging to the citizen, though entrusted to the care of a public body."*

The Data Protection Act 1998 (DPA) gives individuals the right to access personal data (information about themselves) that is held by a data controller.
Our Information Rights Unit provides advice and guidance on Subject Access Requests (SARs).

3.7.1 Tools and sources of information
- Data Protection Act 1998
- Data Protection guidance
- Guidance on the transfer of Protectively Marked Material and Personal Data
- Handling Personal Information (Staff Guidance)
- Wales Accord on the Sharing of Personal Information (WASPI)

3.7.2 How we are meeting the requirements

Framework for responding to legal obligations regarding citizens' access to information about themselves and how it has been used

Where we hold information on members of the public, we have agreed channels to allow people to access this information.

When handling your personal information, we promise to:
- protect it appropriately and make sure nobody has access to it who shouldn't;
- let you know if we need to share it with other organisations to give you better public services, and whether you can say no to this;
- consider privacy risks if we plan to use your personal information in new ways;
- only keep it for as long as we need to; and
- not make it available for commercial use (such as marketing) without your permission.

3.7.3 Future plans

The Digital First Plan[4] was agreed by Cabinet in April 2015. Its purpose is to describe the steps the Welsh Government needs to take to create the environment necessary to enable the public sector to provide excellent online services to the people and businesses of Wales. This has been reaffirmed in Welsh Government's Digital Action plan, developed to improve the way we deliver digital services.

The newly appointed Chief Digital Officer (CDO) for Welsh Government is driving a broad programme of digital transformational change to radically improve how the civil service operates and how government interacts with citizens. The CDO has responsibility for the successful delivery of the Action Plan, focusing initially on transformation and improving how Welsh Government delivers its services through more co-ordinated use of ICT. Future responsibilities include leading change across all parts of the public sector including health, local government, and education to achieve efficiencies and improve services.

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[4] http://gov.wales/docs/det/publications/150421-digital-first-en.pdf

Annex 1: Assessment Criteria for Information Management Maturity

SECTION 1: THE VALUE OF INFORMATION				
1.1 Communicating and Realising Value Goal: The organisation establishes information's value in principle and supports the realisation of value in practice				
Criteria	**Development area**	**Satisfactory**	**Good**	**Best practice**
Setting direction	The organisation recognises the need to set goals for information management, but it does not yet do so at a strategic level.	The organisation has set time-bound strategic goals for information management. These are positioned to support compliance with legal obligations and responsibilities.	The organisation has a mutually supportive strategy/vision for the protection, management and exploitation of information. It sets proportionate goals to address key risks and improve capability and culture.	The organisation has established its information strategy/vision as an integral part of wider corporate strategy/vision. It is subject to regular review and is recognised as a key enabler of business outcomes.
Telling staff why information matters	The organisation recognises that the information it holds and works with has value, but it does not yet define this formally for staff.	The organisation defines the value of information for staff in information management policy. This emphasises legal obligations and responsibilities.	The organisation defines the value of information and required behaviours consistently across supporting and linked policy and guidance.	The organisation ensures that the value of information is defined through standard business processes. Key messages are promoted by senior staff and managers.
Publishing and enabling access to information	The organisation recognises the need to realise the value of its information, but its performance is variable in opening up access to it and publishing transparency data.	The organisation has put in place a framework that supports it to meet required standards in opening up access to information and publishing transparency data.	The organisation has a consistent overall approach to transparency, open data and enabling access to information that is linked to its information strategy/vision. It publicises its commitment.	The organisation establishes good information management as an enabler for transparency and open government. It engages with citizens and proactively publishes information unless there is an overriding reason not to.
SECTION 1: THE VALUE OF INFORMATION				
1.2 Managing Information as a Valued Asset Goal: The organisation manages, protects and exploits its information assets to achieve maximum value				

Criteria	Development area	Satisfactory	Good	Best practice
Defining information as an asset	The organisation recognises the need to manage its information as an asset, but it defines and categorises information assets at too high or too low a level of granularity.	The organisation's definition of an information asset reflects Security Policy Framework requirements and is at a level of granularity that supports oversight and management.	The organisation's definition of an information asset is interpreted consistently across supporting and linked policy and guidance. It encompasses unstructured and structured information.	The organisation's definition of an information asset is fully embedded within the business. It provides a basis for effective governance and staff use it to describe the information they hold and work.
Establishing ownership of information assets	The organisation recognises the need to identify its most sensitive and valuable information assets, but it has not yet done so, or established who owns them.	The organisation has identified its most sensitive and valuable information assets and established who owns them. IAOs are providing assurance against key risks and issues.	IAOs are appointed consistently across the organisation. IAOs understand their role and provide routine assurance on the protection, lifecycle management and exploitation of their information assets.	IAOs actively participate in the organisation's plan to establish the right culture. IAOs work together to ensure information assets are fully utilised so that their value can be realised internally and externally.
Cataloguing information assets	The organisation recognises the need to catalogue its information assets, but it does so to a limited degree or at too high or too low a level.	The organisation uses a framework such as an IAR to catalogue information assets containing personal or business-critical information. Key sensitivities and handling requirements are captured.	The organisation catalogues a wide range of unstructured as well as structured information assets. It consistently captures context that supports effective management including value, risk, content and lifecycle.	The organisation's approach to cataloguing information assets promotes understanding of all the information it holds and has responsibility for. Business requirements are captured in line with The National Archives' Digital Continuity guidance.

SECTION 2: INFORMATION AND SUPPORTING TECHNOLOGY				
2.1 The Technology Environment				
Goal: The technology environment supports the management, protection and exploitation of information				
Criteria	Development area	Satisfactory	Good	Best practice

	Development area	Satisfactory	Good	Best practice
Managing digital information	The organisation recognises the need to manage digital information from creation to disposal, but corporate systems do not yet support lifecycle management.	The organisation has a defined corporate repository for the storage of information that supports lifecycle management. Control is exercised over alternative repositories and legacy holdings.	The organisation adopts a consistent approach to lifecycle management of information across a range of corporate systems. Information can be captured and retained or disposed of in line with a defined retention and disposal policy.	The organisation uses common standards and information management applications operate predictably. Corporate systems make minimal impact on information creators and information can be retained in usable form as long as required.
Finding, exchanging and exploiting digital information	The organisation recognises the need to discover and retrieve stored information, but search functions are unreliable and the technology environment introduces artificial barriers.	The organisation has ensured that search functions meet current business needs. It is reducing artificial barriers within the technology environment that might limit the exploitation of information.	Corporate systems are easy to use and navigate and are consistently structured. The provision of knowledge sharing tools supports the discovery and exchange of information across the network.	Corporate systems enable effective collaboration between internal stakeholders and with external partners. They promote information/work flows and provide automated routes for the publication of data.
Accessing digital information	The organisation recognises the need to ensure the security of sensitive information, but key systems lack appropriate controls.	The organisation has put in place controls in key systems where sensitive information is held, and in relation to removable media to protect against malicious behaviour.	Corporate systems consistently support staff to work with and process sensitive information safely, reducing the risk that alternative solutions will be used.	Corporate systems promote the protection of sensitive information from unauthorised disclosure, alteration and destruction through its lifecycle. Controls are flexible and make minimal impact on users.

SECTION 2: INFORMATION AND SUPPORTING TECHNOLOGY

2.2 The Continuity of Digital Information

Goal: The organisation is taking proactive steps to assure the continuity of its information, over time and through change

Criteria	Development area	Satisfactory	Good	Best practice
Understanding what information is held	The organisation recognises that its information may be vulnerable due to its location, age or format, but it has not yet conducted an assessment or produced a digital	The organisation knows where its most valuable and sensitive information assets are stored and has identified vulnerabilities due to their age or format. It has identified key digital continuity objectives.	The organisation has taken proportionate steps to understand the contents of its file stores, conducting analysis and prioritising risks and issues. It has developed a digital continuity plan.	The organisation uses its understanding to inform decisions on application provision and infrastructure rationalisation. Digital continuity planning is helping drive the effective

	continuity plan.			use and exploitation of current business information.
Understanding how technology supports usability	The organisation recognises that technology supports the usability of its information, but it has yet to identify key dependencies.	The organisation has mapped the key technical systems, platforms and processes that its most valuable and sensitive information assets require to be usable.	The organisation has documented at an appropriate level how technology supports its information assets to be usable. It has defined key information/work flows.	The organisation has embedded consideration of supporting technology within its information asset management approach; KPIs are set and the impact of changes is tracked.
Considering digital continuity ahead of change	The organisation recognises the need to consider business requirements for information management during IT change and procurement, but it has no formal means of doing so.	The organisation has established formal mechanisms to support consideration of business requirements for information management during major IT change and procurement.	The organisation ensures that IT change and procurement processes consistently factor in business requirements for information management. Meeting them is recognised as a core success criterion.	The organisation is maintaining its understanding of its business requirements for information management. Potential threats and opportunities relating to information assets actively inform decision making during change.

SECTION 3: INFORMATION RISK, GOVERNANCE AND OVERSIGHT

3.1 Recognising Information Risk
Goal: The organisation defines and manages information risks to minimise threats and maximise opportunities

Criteria	Development area	Satisfactory	Good	Best practice
Governance for information risk	The organisation recognises the need to provide leadership on information risk, but it has not yet established an appropriate governance structure.	The organisation has appointed a SIRO who is appropriately trained. It has put in place a security governance structure that provides accountability and leadership on information risk.	The SIRO and Board consistently and visibly sponsor and champion the management of information risk. They emphasise the importance of adherence to corporate policy and guidance.	The SIRO and Board prioritise the establishment of a reporting and learning culture. Senior staff and managers recognise their accountability and consistently promote the importance of managing information risk at all levels of the organisation.
Establishing how to manage information risk.	The organisation recognises that information risks may have significant impact, but it	The organisation has produced a definition of information risk that reflects legal and	The organisation has defined tolerances, appetites, reporting lines and escalation routes. It	The organisation manages information risk within the standard business risk framework, and it is

	has not yet produced a definition or produced a policy for its management.	regulatory requirements and has published an information risk management policy.	consistently assesses risks to inform decisions on the management, handling and exploitation of information.	represented on risk registers at all levels. It is considered alongside and as a factor in other business risks.
Identifying causes, threats and opportunities	The organisation recognises the need to develop its understanding of information risk, but it identifies a narrow range of causes and has not yet documented it at an appropriate level.	The organisation has identified key information risks at a proportionate level. It recognises that information management as well as handling can be a significant source of risk for the organisation.	The organisation documents a proportionate range of threats raised by governance, planning, policy and practice in information management and handling. It identifies mitigating actions.	The organisation documents the risk of not sharing or exploiting information according to its value. It emphasises the potential strategic impact of such risks, focussing on opportunities as well as threats.

SECTION 3: INFORMATION RISK, GOVERNANCE AND OVERSIGHT

3.2 Establishing Control
Goal: The organisation has effective governance structures in place that foster communication and strategic planning

Criteria	Development area	Satisfactory	Good	Best practice
Planning and delivering a service to the business	The organisation recognises the need to allocate lead and operational responsibility for information and records management, but it has not yet done so.	The organisation has allocated lead and operational responsibility for information and records management. A plan to address key priorities has been developed.	The information and records management function has staff with the necessary KIM skills and a proportionate plan in place to provide support to the business, improve capability and address identified risks.	The information and records management function is positioned to provide crucial assurance to the board. It actively engages with the business and is responsive to emerging needs.
Ensuring information professionals support each other	The organisation recognises the need for communication between information and records management, IT and IA staff, but few formal channels exist.	The organisation has established formal channels that support communication and collaboration between information and records management, IT and IA staff.	Information management and records management, IT and IA staff are working together on a routine basis. Governance arrangements such as Board membership enable a co-ordinated approach.	Information and records management, IT and IA staff engage in joint planning at a strategic and operational level. Close working relationships ensure that a shared understanding is maintained.
Devolving responsibility to supporting networks	The organisation recognises the need to devolve administrative responsibility for	The organisation has identified where it needs to devolve administrative responsibility for	The organisation is setting up networks and communities. These are well supported and are	The organisation has well-established networks and communities in place. These are providing expert

	information management, but it has not yet defined how it will do this in practice or allocated supporting roles.	information management. Roles have been allocated to support compliance with policy and support the business.	working together to enable the consistent protection, management and exploitation of information.	advice and have a recognised role in enabling operational efficiency and effectiveness.

SECTION 3: INFORMATION RISK, GOVERNANCE AND OVERSIGHT

3.3 Providing Guidance
Goal: The organisation gives staff the instruction they need to manage, protect and exploit information effectively

Criteria	Development area	Satisfactory	Good	Best practice
Establishing policy to inform decision-making	The organisation recognises the need to provide policy and guidance for information and records management, but documentation is not current or easy to find.	The organisation has current, comprehensive published policy and guidance in place for information and records management. It is centrally hosted, easy to find and accessible.	Policy for information and records management exists within a wider framework that is mutually supportive and targets identified risks. It is endorsed by senior management and promulgated.	Policy for information and records management is aligned with information and business strategies. It is published externally and regularly reviewed to ensure on-going relevance.
Identifying what to keep and how it should be managed	The organisation recognises the need to manage volumes of digital information, but it does not yet provide appropriate disposal guidance for staff.	The organisation has produced generic disposal guidance that establishes what information needs to be kept, where, by whom and for how long.	The organisation produces proportionate, tailored disposal guidance. It works with users to ensure guidance remains up-to-date and reflects key quality requirements.	Disposal guidance is recognised as a key corporate resource. Its use is promoted at all levels of the organisation as a means of mitigating risks to the availability and completeness of information.
Meeting training needs	The organisation recognises the need to ensure staff are aware of standards for information management, but it is not yet providing training.	The organisation has identified training requirements for information management. It is providing instruction to ensure staff are aware of standards and guidelines.	The organisation consistently engages senior staff and managers to increase understanding of good practice. It employs professional information management staff and supports their continuing development.	The organisation ensures that protecting and managing information are recognised as key competencies and embedded within induction processes at all levels. Training needs are evaluated on an on-going basis.

SECTION 3: INFORMATION RISK, GOVERNANCE AND OVERSIGHT

3.4 Measuring Impact
Goal: The organisation measures performance in practice and takes informed risk-based action as a result

Criteria	Development area	Satisfactory	Good	Best practice
Establishing oversight to monitor performance	The organisation recognises the need to understand how information is being managed and handled, but lacks oversight and has not defined metrics.	The organisation has sufficient oversight of the technology environment to understand how information is being managed and handled within corporate repositories. It has defined a basic range of metrics.	The organisation has oversight of the majority of the technology environment. It has identified a proportionate range of metrics that can help it to understand how information is being handled, managed and exploited.	The organisation has oversight of the whole technology environment and it can obtain detailed metrics according to need, at all levels. It has identified a range of quantitative and qualitative performance measures.
Reporting performance	The organisation recognises the need to report performance in information management and handling, but is not yet defined requirements.	The organisation has defined when and how to monitor performance in information management and handling in line with its own needs.	The organisation routinely reports progress in information management and handling, emphasising progress to drive capability and manage risks. Performance is visible at Board level.	The organisation seeks continual assurance on performance in information management and handling and progress to achieve information strategy goals. It can demonstrate the business benefit of KIM in line with corporate objectives.
Targeting bad practice and driving up standards	The organisation wishes to increase capability in information management and handling, but has not yet established benchmarks.	The organisation has defined what good and bad look like in terms of compliance with legislation, regulatory requirements and key business outcomes. Responsibility for corrective action is allocated.	The organisation is using its understanding of performance in information management and handling consistently, to highlight good practice and prioritise areas for improvement.	The organisation uses tools such as information management improvement plans, maturity models and internal health checks on a structured basis; performance is assessed to drive continual improvement.
SECTION 4: RECORDS REVIEW AND TRANSFER				
4.1 Records Appraisal and Selection Goal: The organisation understands the value of its records and can consistently identify those with enduring historical value				
Criteria	Development area	Satisfactory	Good	Best practice
Enabling compliance with the Public Records Act	The organisation recognises the need to appoint a Departmental Records Officer (DRO), but it has not yet done so	The organisation has appointed the DRO role to oversee the management of information. It has defined its approach to	The DRO role is positioned and supported to highlight key risks relating to records management. The DRO	The DRO role is integrated within wider systems of corporate governance. The DRO role plays a pro-active role in championing

	or defined its obligations under the Public Records Act.	addressing obligations under the Public Records Act.	has a recognised role in leading on compliance with the Public Records Act.	a culture of good information management.
Understanding volumes and value and managing resources	The organisation knows that its information is governed by the Public Records Act, but does not have an understanding of what it holds nor how to appraise its value.	The organisation can make a rough estimate of records held in all formats. It has identified roles and responsibilities required to meet its obligations under the Public Records Act.	The organisation can consistently determine the total volume of records it holds in all formats. It is able to judge the value of its records in line with key business objectives, functions and processes.	The organisation maintains its understanding of what information it holds, where and in what format. Its approach for records appraisal involves the business and is aligned with retention scheduling process.
Selecting records of historic value	The organisation recognises that its records may have value for the users of the future, but is not yet able to identify them or apply selection criteria.	The organisation has used generic selection criteria to develop its justifications for selection. It is investigating how to apply these to digital and hybrid records.	The organisation understands which records are likely to hold historical value, and is able to select them consistently in line with the policies agreed with The National Archives, using different methods to address different requirements.	The organisation has produced and published a clear description defining historical value, which is endorsed by The National Archives after public consultation. It selects records using the application of the agreed and justifiable criteria across all formats.

SECTION 4: RECORDS REVIEW AND TRANSFER

4.2 Implementing Disposal Decisions

Goal: The organisation understands the process for records disposal and consistently implements decisions in line with defined plans

Criteria	Development area	Satisfactory	Good	Best practice
Disposing of records securely	The organisation recognises that it needs to dispose of records, but has not yet defined how to do so across all formats.	The organisation has defined requirements for the secure disposal of records (including closed records). It is carrying out the secure destruction of records in all formats and maintaining an audit trail	The organisation has the resources and support to consistently implement approved value-based processes for the routine and secure disposal of paper and digital records in line with its disposal policies.	The organisation takes routine and auditable decisions on the disposal of all records in all formats with support from the business. It actively monitors performance of contractors to ensure criteria are met.

Reviewing records for sensitivity	The organisation recognises the need to conduct sensitivity review, but does not yet provide a trained and expert resource.	The organisation has defined its requirements for sensitivity review, including consultation and redaction. It provides a suitably trained and expert resource and ensures it applies to the Lord Chancellor's Advisory Council in time to meet the 20 Year Rule.	The organisation has arrangements in place to determine routinely which records should be retained in the department, designated as open on transfer or transferred as closed. Exemptions are applied consistently across records.	There are proven, monitored processes in place for the sensitivity review of paper records and application of exemptions. The organisation is working with TNA to understand requirements for digital records.
Planning to transfer records	The organisation recognises its obligations to transfer records, but lacks a plan, or plans on an ad-hoc basis.	The organisation is working to a defined and agreed plan for records transfer to The National Archives and other places of deposit.	The organisation understands the impact of the 20-year rule on transfer volumes and has a proportionate plan in place to meet requirements covering all formats.	The organisation consistently meets the targets it sets and actively engages with The National Archives on the early transfer of records in all formats, where practicable and appropriate.