

CORPORATE INFORMATION POLICY

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Author (s) of Document:	Helen Cannings, Team Leader Information Governance	
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Changes:	September 2017	New Policy which replaces the following corporate policies: Freedom of Information; Records Retention & Disposal Schedule; Information Security; Information Lifecycle Management; Information Asset Register; Business Classification Scheme; Data Protection.
	March 2019	Minor amendments to reflect organisational change and revised supporting procedures

1. What is this policy for?

This Policy sets out the Council's policy on the use and governance of our information and data.

2. Who is this policy for?

This Policy applies to:

- all staff, agency staff and volunteers of the Council
- elected members, contractors and sub-contractors of the Council when involved in processing, or making decisions about the processing of, Council information and data
- any other person who in any way processes, or makes decisions about the processing of, Council information and data.

Processing includes but is not limited to the following activities, whether or not they are conducted by automated means: collection, recording, creation, organisation, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, dissemination or otherwise making available, alignment or combining, restriction, erasure or destruction.

3. Why do we need this policy?

Information and data are key assets of the Council. Realising the value of our information and data to evolve as an organisation means we need a strong, consistent, integrated and corporate approach to the use and governance of our information and data, so that we have clear assurance around our information assets, and we have information and data which is fit to enable both our day to day business, and our transformation.

Good quality information and data is the cornerstone of us being open and transparent, because it allows us to explain and justify the decisions that we have made, evidence the processes we have followed, and comply with our legal and statutory responsibilities.

Because of who we are, a great deal of our information is about the people we serve. Being the custodian of this type of information about people's lives is a huge responsibility, so making sure we properly steward our people's information is critical to maintaining the trust we need to deliver outcomes for our people, place and economy.

If we fail to manage our information and data properly, we may not have the right information and data in the right place, at the right time to deliver services for our customers. For critical services, this can have serious consequences. If we don't manage our information and data properly, our customers may lose confidence in us, our reputation may suffer, and we won't have the trust we need to engage meaningfully within the wider community to shape Aberdeen's future.

The adoption of an Information Policy means that we are taking a consistent approach across the Council to the use and governance of all of our information and data, in order to deliver outcomes for our people, place and economy.

The Council's use and governance of our information and data is increasingly subject to legislation, Government guidelines, scrutiny and audit. This Policy sets out the Council's position in relation to compliance with relevant Data Protection, Freedom of Information, Environmental Information, Re-use of Public Sector Information and Public Records law.

4. What does it mean for the Council? (Policy Statement)

The Council values its information and data, and recognises the crucial role that the proper use and governance of our information and data plays in:

- **delivering outcomes for our people, place and economy**
- **respecting privacy and fostering trust**
- **demonstrating accountability through openness**
- **enabling and supporting our staff**
- **building Aberdeen's memory**

These form the Council's guiding principles in relation to its information and data.

Because the Council serves the people and place of Aberdeen in such a diverse range of ways, the range and volume of information and data we create, receive and use to do this is huge.

The Council's information is defined as all information and data created, received, maintained or used by or on behalf of the Council, in any format and of any age. This includes, but is not limited to: paper records, email, spreadsheets, data in business systems, audio and video recordings, web pages, and CCTV recordings. Under each of our guiding principles, the Council is committed to the following policy statements in relation to its information and data:

Delivering outcomes for our people, place and economy

1. The Council is committed to improving the management of our information and data so it is aligned to our strategic objectives for our people, place and economy.

Our information and data supports our business. More than that, the way we use and govern our information and data can either enable or hinder us doing business in the best way to deliver for our people, place and economy.

2. The Council is committed to ensuring that effective and proportionate security, business continuity and disaster recovery arrangements are in place to protect and safeguard our information and data.

The Council recognises that appropriate security, business continuity and disaster recovery arrangements are essential to ensure the consistent availability, integrity and confidentiality of its information and data, which we rely on to deliver for our people, place and economy.

3. The Council is committed to the ethical use of its information and data for robust, transparent and evidence-based decision making.

The Council understands that the way we use, analyse, interpret and present our information and data is crucial to ensure we make robust, transparent, evidence-based decisions.

4. The Council is committed to realising the potential value of its information and data beyond the Council, by opening up our information and data, and making it available free of charge, wherever we can.

The Council recognises that the information and data it holds, due to its unique role in the lives of the people and place of Aberdeen, has a potential value which extends beyond the Council, to our local and national communities.

Respecting privacy and fostering trust

5. The Council is committed to the ethical, fair, lawful and transparent care of the personal information we process to carry out our business, in accordance with applicable data protection law.

A great deal of the information and data we hold is about the people we serve. Being the custodian of this type of information about people's lives is a huge responsibility, which the Council takes very seriously.

Demonstrating accountability through openness

6. The Council is committed to complying with the requirements of the Public Records (Scotland) Act 2011, Data Protection law and any other legislation which governs the way we create, use or dispose of our information and data.

The Council is committed to creating the right information and data so we can be held accountable for the decisions we've made, actions we've taken, and processes we've followed, and managing this information and data in the right way throughout its lifecycle, including keeping it for the right amount of time.

7. The Council is committed to complying with the requirements of the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.

The Council recognises the important role that the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 play in supporting accountability through openness and transparency.

Enabling and supporting our staff

8. The Council is committed to providing staff with appropriate procedures, guidance, training and awareness activities to support them to play their part, effectively and accountably, in the proper use and governance of the Council's information and data.

The Council recognises the central role our staff play in the proper use and governance of our information and data.

Building Aberdeen's Memory

9. The Council is committed to the ongoing appropriate permanent preservation of information and data which will continue to build the memory of the people and place of Aberdeen for future generations.

The Council recognises that our information and data are the building blocks of the Council's corporate memory, and of the memory of the people and place of Aberdeen.

5. How will we make it happen?

Overall governance and strategic responsibilities for this policy are assigned to the Council's Senior Information Risk Owner (SIRO). All activity relating to this policy is monitored, actioned and reported to the SIRO through the Information Governance Group. The Council's approach to ensuring the effective and appropriate use and governance of our information and data is focussed on three key areas:

- **People and Behaviour**

Everyone who creates or uses Council information or data shares responsibility for making sure we do it right.

That said, getting the proper use and governance of our information right means we need to make sure that the Council has the right expertise, leadership, accountability and ownership for the management of its information, so that everyone is clear on what their role is, how they do it, and where they can go for help and support.

- **Systems and Processes**

Making sure that everyone covered by this policy can carry out their roles effectively on behalf of the Council means having the right systems and processes in place; this includes standards, procedures, handbooks and guidance, training and awareness activities, underpinned by a culture throughout the Council that values our information.

- **Adapting and Learning**

Ensuring the proper use and governance of the Council's information and data is an ongoing activity. New and changing legislation, systems, staff, and ways of doing business, as well as new and emerging cyber threats, all shape and change the environment within which the Council operates in relation to effective use and governance of its information and data.

Keeping up means a careful balancing between the requirement to monitor and be adaptable to our changing environment, and the requirement to agree and implement improvements over the medium term, in line with the Council's Information Strategy, and associated Information Assurance Improvement Plan. This balance will be managed through the following roles and responsibilities:

5.1 Roles & Responsibilities

Everyone

Everyone covered by this policy is responsible and accountable for managing and using information in accordance with all relevant corporate policy, and corporate and local procedures. This includes but is not limited to the procedures on the left.

More broadly, everyone covered by this policy is responsible for taking appropriate care of the information and data they create, use, update and communicate in the course of their work.

Any deliberate or wilful breach of this policy may lead to disciplinary or other appropriate action being taken and may be reported to the police.

Corporate Information Handbook

The Corporate Information Handbook sets out the Council's procedures in relation to the creation, organisation, communication, protection and disposal of information and data, including the Council's business classification scheme and records retention and disposal schedule. Everyone is responsible for following these procedures, in conjunction with any other corporate, team or service level procedures in relation to the proper use and governance of information and data. The Handbook includes a full range of Corporate Data Protection Procedures which cover all aspects of ensuring the Council's use and governance of personal data is ethical, fair, transparent and lawful. Everyone is responsible for ensuring that these are followed.

Freedom of Information and Environmental Information Procedures

The Council has Corporate Procedures in place which set out how it manages compliance with the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004. Everyone is responsible for ensuring that these procedures are followed.

Information Asset Owners

Information Asset Owners are senior business managers who are responsible and accountable for the specific, defined information assets within their remit, in accordance with the Council's Information Asset Owner Handbook.

Information Asset Owners are responsible for ensuring all staff understand and act in accordance with their responsibilities outlined in this policy.

Information Asset Owners are responsible for maintaining the Information Asset Register in relation to their asset(s) and providing regular assurance to the Senior Information Risk Owner about the management of their asset(s).

Information Asset Owner Handbook

The Council's Information Asset Owner Handbook, and supporting guidance, sets out the role of the Information Asset Owner and how this is carried out. All Information Asset Owners are responsible for carrying out their role in accordance with this Handbook.

Information Asset Register

The Council maintains an Information Asset Register to record all information of value held by the Council, which provides the basis for ensuring that the arrangements in place to secure and protect the information assets are effective and proportionate in relation to the value and risks around each asset. Information Asset Owners are responsible for maintaining entries in the Register.

Information Asset Assurance Statements

Information Asset Owners provide the Senior Information Risk Owner with regular Information Asset Assurance in relation to the ongoing management of their information assets.

Information & Data Governance Office

This Office is the central corporate office which is responsible for setting, owning and driving information and data strategy, policy, standards and practice across the organisation.

The Information & Data Governance Office holds the corporate Information Asset Register on behalf of the SIRO. The Data Office is led by the Council's Information Manager.

Information Strategy, Policy and Standards

The Data Office is responsible for setting, owning and driving information and data strategy, policy, standards and practice across the organisation.

Records Management Plan

The Data Office will maintain the Council's Records Management Plan which sets out its proper arrangements for records management across the organisation in accordance with the Public Records (Scotland) Act 2011. This plan is monitored through the Information Governance Group and formal updates are submitted to the Keeper of the Records of Scotland on an annual basis.

Information Governance Group

The Information Governance Group brings together specialist roles across the organisation in Freedom of Information, Data Protection, Risk Management, Performance, Information Security, Information and Data Management, and Information Preservation, Business Support, Organisational Development, and Corporate Investigations.

Information Governance Performance Monitoring and Reporting

The Council's Information Governance Group is responsible for collating, analysing, and monitoring the Council's performance in relation to compliance with information legislation and information security, to ensure that trends, issues, incidents and breaches are dealt with appropriately as they arise.

Information Assurance Improvement Plan

The Information Governance Group agree and implement the Council's annual Information Assurance Improvement Plan, in conjunction with relevant stakeholders throughout the organisation, and in accordance with the Council's Information Strategy. This plan sets out the Council's priorities in the following key areas:

- Oversight & Control
- Legal & Business Requirements
- Technical & Physical Security
- Business Continuity & Disaster Recovery
- Information Sharing & Integration
- Culture, Awareness & Training
- Information Preservation
- Information for Strategic Performance Management & Transformation
- Realising Information Re-use Value

Data Protection Officer

The Council's Data Protection Officer (DPO) is responsible for monitoring the Council's compliance with Data Protection law and acting as the point of contact for the public and the Information Commissioner's Office.

Data Protection Impact Assessments
The DPO provides support on the completion of Data Protection Impact Assessments, as well as providing expert advice on Data Protection issues more broadly.

Data Protection Compliance Monitoring
The Council's DPO is responsible for monitoring compliance with data protection legislation across the organisation.

Data Protection Culture
The Council's DPO is responsible for fostering a data protection culture throughout the Council.

Data Protection Point of Contact
The Data Protection Officer is the first point of contact for members of the public and for the Information Commissioner's Office on all matters relating to personal data.

Senior Information Risk Owner

The Senior Information Risk Owner (SIRO) is accountable to the Council's Chief Executive Officer for the management of the information risks across the Council.

This role chairs the Information Governance Group. The Council's SIRO is the Chief Officer - Governance.

Information Risk
The SIRO has overall responsibility for monitoring the Council's information risk and provides assurance to the Council's Chief Executive Officer.

Information Culture
The SIRO leads a culture throughout the Council that values, protects and uses information for the success of the Council and benefit of its customers.

Information Asset Ownership
The SIRO has overall responsibility for ensuring the Council's Information Asset Owners are carrying out their roles effectively and are consistently implementing information risk processes.

Information Incident Management
The SIRO owns the Council's information incident management framework.

6. How will we manage any risks that affect this policy?

6.1 Information Risk Register

The risks to the Council from a failure to appropriately manage the lifecycle of its information are outlined in the Council's Information Risk Register, which is managed by the Council's Senior Information Risk Owner. The Council's Information Risk Register is used as the basis for the Council's Information Assurance Improvement Plan, to ensure that the measures and actions identified and completed appropriately control and mitigate the Council's information risks.

6.2 Cluster Risk Registers

Information Asset Owners are responsible for managing risk to the information assets that they are responsible for, these risks are managed through Cluster Risk Registers and included in Business Continuity planning and disaster recovery arrangements wherever appropriate.

6.3 Corporate Risk Register

Information governance and cyber security also pose a strategic risk for the Council which is recorded in the Corporate Risk Register. The Council's SIRO provides the Council's Corporate Management Team with regular updates on the strength of controls in place against this risk.

7. How will we know if it's working?

All activity relating to this policy will be monitored by the Information Governance Group and reported by the Senior Information Risk Owner to the Corporate Management Team on a quarterly basis, and annually to the Audit, Risk & Scrutiny Committee through an annual Information Governance Report.

8. How will we keep this policy up to date?

This policy will be reviewed annually by the Information and Data Governance Office to ensure that it meets business and accountability requirements, and measurable standards of good practice.

9. Related Policy Document Suite

Strategy & Policy

- [Local Outcome Improvement Plan](#)
- [Strategic Business Plan](#)
- [Information Management Strategy](#)
- [Being Digital Transformation Strategy](#)

- [ICT Acceptable Use Policy](#)
- [Protective Monitoring Policy](#)
- [ICT Access Control Policy](#)

Procedures and Protocols

- Corporate Information Handbook
- Corporate Records Retention & Disposal Schedule
- Freedom of Information & Environmental Information Procedures
- Information Asset Owner Handbook
- Insider Information Protocol

Related Legislation

- [General Data Protection Regulation](#)
- [Data Protection Act 2018](#)
- [Freedom of Information \(Scotland\) Act 2002](#)
- [Environmental Information \(Scotland\) Regulations 2004](#)
- [Public Records \(Scotland\) Act 2011](#)
- [Re-use of Public Sector Information Regulations 2015](#)
- [Market Abuse Regulation](#) (concerning Insider Information)