

Information Management Assessment

Department for Environment, Food and Rural Affairs

Reviewed

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Working with government

to raise standards in information management

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Background

- The first Information Management Assessment (IMA) of the Department for Environment, Food and Rural Affairs (Defra) was held in 2011 and was formally closed in October 2013. The IMA reassessment involved a detailed review of supporting documentation and interviews with senior staff, specialists and practitioners. These were held in the department's offices in London and Alnwick between 4 and 12 September 2017. Additional interviews with key staff were conducted by telephone later in the month.
- This report provides a summary of the good practice and risks we identified, focussing on the most significant findings.
- We recommend that permanent secretaries/chief executive officers publish a statement of commitment to our assessment process that also underlines the importance of good practice in information and records management. Defra plans to promote and publicise the statement of commitment that was shared with The National Archives before the IMA to support creation and delivery of its IMA action plan.

Executive summary

- There are 10 performance headings embedded in this IMA report. Defra receives
 a Satisfactory rating under six headings. A Satisfactory rating indicates an
 approach that is positioned to support efficiency, effectiveness and compliance
 with legal obligations and responsibilities.
- Defra receives a medium priority Development area rating under the report's remaining four headings. A Development area rating indicates a key issue or gap in process or governance that may trigger a range of risks.
- Positive approaches and key improvements made since the last IMA are included in the key highlights summary below on page 4.

Ratings received ranked by priority

Performance rating: Development area		
Priority	Medium	
Report section	1.1 Communicating and realising value (page 6)	
1.2 Managing information as an asset (page 7)		
2.2 Digital continuity and IT change (page 9)		
3.1 Recognising information risk (page 9)		

To improve performance under these headings Defra needs to:

 Ensure strategic priority is attached to driving and maintaining a supportive information management culture in addition to the provision of an enabling Office 365 environment. Active engagement and sustained top down support from senior management is needed to ensure the importance of good practice is recognised and to provide impetus for behaviour change.

- Strengthen current processes for information asset governance to ensure effective assurance is being obtained.
- Build on the foundations provided by Defra's previous digital continuity project and ensure that key vulnerabilities of digital information relating to age and format are identified so they can be addressed.
- Ensure that risks related to information and records management are formally identified and recorded on risk registers. This includes assessing the impact if key information is not available as needed or usable. Defra needs to state clearly how the burden of mitigation for these risks is distributed between Knowledge and Information Management (KIM) and IT and the business areas responsible for implementing corporate policy. Defra should also ensure that information management related risks are covered by its information risk policy.

Performance Rating: Satisfactory		
Priority:	Low	
Report section	2.1 Supporting information through technology (page 7)	
	3.2 Establishing control (page 10)	
3.3 Providing guidance (page 10)		
	3.4 Measuring impact (page 11)	
	4.1 Oversight of records and selection (page 11)	
	4.2 Implementing disposal decisions (page 12)	

To maintain performance under these headings, Defra needs to:

- Identify how a good practice KIM service will be delivered from the centre and supported through use of devolved networks as Defra embeds SharePoint 2013 and moves to introduce the Office 365 environment.
- Ensure policy and supporting guidance are kept up-to-date and promoted (including through induction) as the IT environment develops and evolves. Retention schedules should be published on GOV.UK.
- Identify how information management practice will be monitored and reported to drive improvements now that SharePoint 2013 is in place.

 Continue to engage with The National Archives and cross-government initiatives to ensure 20-year rule commitments can be met and the department is well placed to begin its first digital transfers.¹

IMA reports and departmental action plans are published on The National Archives' website at: nationalarchives.gov.uk/information-management/our-services/ima-reports-action-plans.htm

Good practice and key highlights

The following are among the areas of good practice identified at the time of the IMA. They include approaches that other government organisations may find helpful in mitigating information and records management related risks:

- Business engagement and partnering was a significant component of the SharePoint 2013 build and deployment, which was delivered by a small team. Defra carried out content analysis of shared drive folders, holding design workshops and providing training. Project principles were established, but Defra worked to adopt a flexible approach that recognised specific user needs, including restricting access to sensitive information. Ongoing support has been provided to business areas that have encountered issues with new file structures, with scrutiny of take-up and use of team sites delivered through a cross-department review.
- Defra has collected monthly reports on Exchange Server volumes, and used these
 to identify those staff with the largest inboxes and offer support. It has now identified
 owners of legacy .pst files and plans to engage with them to ensure record content
 is captured prior to the move to Office 365.
- KIM have moved into the Digital Data and Technology Service directorate. Following
 this, the Data Asset workstream moved into KIM. This new governance structure
 has the potential to support and enable a more formal, joined-up and holistic
 approach to the protection, management and exploitation of information and data.
- The Local Information Champions (LIC) role was set up to support preparations for the move to SharePoint 2013 and the effective use of team sites once the system was in place. Defra has now begun work on an LIC engagement plan to ensure consistent messaging and is working to develop and embed an LIC community. It has consulted with LICs via a survey to gauge views and identify how the role could be improved and used more effectively. It is also introducing a new LIC newsletter to highlight news and events, with reminders and tips intended to help make the role easier to carry out.
- Each function in a directorate is being encouraged to provide a description on its team site. The example we viewed was comprehensive and was being actively updated. Completion and maintenance of function pages was identified as an enabler for future digital appraisal, as well as for current knowledge management.
- Processes for appraisal and selection of paper records are well organised and managed. Defra adopts a good-practice macro-appraisal approach that looks at file

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¹ http://www.nationalarchives.gov.uk/about/our-role/plans-policies-performance-and-projects/our-projects/20-year-rule/

- series with records sifted by title based on this. The review team is drawing on a range of evidence including past decisions to standardise selection decisions.
- Defra has adopted a proactive approach to trialling software to help interrogate the 9TB of legacy digital information from its shared drives that is held on its servers. It conducted a trial to assess the e-Discovery capabilities of The National Archives' Digital Records Object Identification (DROID) file profiling tool, identifying a number of quick wins. It also worked with the Better Information for Better Government programme to trial potential e-Discovery solutions, contributing to government understanding of good practice options. Following on from this, Defra is looking into alternative tools used by other IMA programme members.

Recommendations to address risk areas

Full details including suggested supporting actions are in Annex A (see page 13).

Recommendation	To address a medium-priority development area rating
1	Bring information and records management practice within scope of KIM vision statements and establish a plan to develop and maintain the right information management culture. Active and visible support of senior management is needed to help deliver change.
2	Deliver greater support and challenge to Information Asset Owners, ensuring key threats are surfaced consistently. This report places particular emphasis on those related to lifecycle management and digital continuity.
3	Identify digital continuity priorities to ensure the usability of digital information and embed these in KIM planning.
4	Define the risk to the department and wider Defra Group of a failure to manage information and records effectively, and a failure to ensure digital information remains usable. Mitigating actions and monitoring mechanisms should be established.
	To maintain a satisfactory rating
5	Maintain the priority currently attached by Office 365 plans to information management and information assurance, ensuring opportunities to embed good practice approaches are taken.
6	Continue promoting information and records management policy and supporting guidance. This should be reviewed before the introduction of Office 365 to ensure an effective mandate is established for teams and individuals.
7	Build on the positive start made through team site reviews and establish a new performance monitoring model that can be developed and embedded over the long term.
8	Maintain the priority currently attached to meeting the requirements of the 20-year rule transition period.

Key findings of the assessment

1 The value of information

Key developments since closure of Defra's last IMA:

- The November 2013 Defra Network Knowledge Strategy has closed. This was published and promoted internally, but no formal implementation plan was produced. A new set of interlinked visions for Knowledge and Information Management (KIM) has been circulated to the six agencies and nondepartmental public bodies due to move to Office 365 with core Defra.
- Defra participated in a series of Information Asset Owner (IAO) training workshops run by The National Archives in September and December 2014 for a total of 39 staff.

Performance heading	Performance rating	Priority
1.1 Communicating and realising value	Development area	Medium

- The staggered roll-out of SharePoint 2013 On Premise has provided an opportunity to engage individual business areas on the subject of information and records management as new team sites were being set up. However, with the exception of specific steers provided by managers in teams with particular drivers for good practice, such as threat of audit, the staff we spoke to did not recognise any accompanying top-down steer on the importance of information and records management. Visible leadership is needed to help promote the message that information and records management is a key part of staff's day-to-day role and not an optional addition to it. Defra should formally appoint a senior information and records management champion to support key communications and help promote consistent understanding. Defra should also consider factoring information management into assurance statements provided by senior staff as other IMA programme members such as the Foreign and Commonwealth Office have done.
- The annual personal commitment statement was mentioned as one means by which Defra established the importance of information management. While it is positive that information capture is mentioned in this document, the subject could, in our view, be given considerably more emphasis than the current two lines. The document should be updated to provide a more meaningful steer on information management responsibilities, and to reflect the introduction of SharePoint 2013.
- Defra's ambitious set of interlinked user, business and KIM visions for 2018 and beyond recognises the need to respond to changes in the way people work across the departmental Group. Achievement of the visions is positioned as an enabler for greater efficiency and improved ways of working. However, the visions have not been explicitly aligned with current Defra Group strategic objectives and priorities. Defra should address this and ensure the visions are embedded in Digital, Data and Technology Services (DDTS) planning following the KIM team's

move into the directorate (see page 10). The relationship with the separate vision established by the Office 365 adoption strategy should also be clarified.

 We note in particular that the KIM and Office 365 adoption strategy visions place no emphasis on the role that information and records management practice will play in ensuring effective utilisation of the Office 365 environment. Defra must address this and make a clear statement on how it will enable improved behaviours and drive business ownership of good practice. Senior support for this work is needed to drive business engagement. See recommendation 1

Performance heading	Performance rating	Priority
1.2 Managing information as an asset	Development area	Medium

- Defra's information asset governance approach extends beyond personal data to give some proportionate coverage to unstructured information including sensitive policy documentation and legal advice. No department-specific guidance has been established to set out how Defra's information assets should be managed, protected and exploited. Processes around handover of the IAO role appeared relatively informal, with IAOs rather than the central team expected to brief their successor on requirements of the role.
- Processes for risk assessing and reporting on information assets would benefit
 from more structure. The information asset register itself contains 24 fields, which
 is a relatively high number. Those for lifecycle management and digital continuity
 did not appear to be interpreted or completed consistently by IAOs. Clear
 requirements need to be identified in both cases. Defra could be doing more to
 support and challenge IAOs. See recommendation 2

2 Digital information and supporting technology

Key developments since closure of Defra's last IMA:

- SharePoint 2013 was rolled out to the core department through a formal Electronic Document Records Management System (EDRMS) project, which ended in April 2017. This aimed to introduce a single shared corporate repository that reduced technical barriers to good practice. Access to legacy material from Defra's shared drives and SharePoint 2007 that was not migrated has been restricted.
- A digital continuity strategy implementation plan was developed prior to closure of the department's digital continuity project in 2015. A project closure report was produced.

Performance heading	Performance rating	Priority
2.1 Supporting information through technology	Satisfactory	Low

- EDRMS project goals included automating metadata capture and restricting the
 number of content types to reduce the burden on users. It aimed to increase the
 availability of information, a potential benefit recognised by a number of the staff
 we spoke to. Routine digital disposal will be a new step for the department and
 continued focus will be needed to ensure document libraries are set up and used
 correctly as it works to embed use of SharePoint.
- Defra imposes a limit of 1GB on personal drive storage and has a standard email quota of 200MB. These are intended to discourage staff from storing information with value outside shared repositories and help drive disposal of ephemeral material. This policy is not being adhered to, and the number of staff with mailboxes over 2GB in size grew from 26 in June 2015 to 132 in July 2017, while nearly one in five staff now has a mailbox over 1GB in size. Defra has invested in third-party software to make it easier to capture emails in team sites. This, though, is not likely to drive effective mailbox management by itself. At the same time, there is a continuing risk that email of value may be lost if staff are using the Vault email archive, which has an activated three-year retention policy, as a means of freeing up space in their inbox. Although this is against policy, a number of interviewees indicated they were doing this, in some cases routinely.
- Defra is in the process of defining options for migration of Vault contents as part of the move to Office 365 and introduction of Exchange Online. The decision taken must factor in the likelihood that information with value will be held in Vault and take a risk-based approach to ensuring its capture.
- Email management was covered in SharePoint training. Defra has provided support to some of those identified as holding the highest volumes of email and has been working to address the issues of orphaned shared mailboxes. It should now take the opportunity offered by the introduction of Office 365 to review its approach to restricting personal storage in overall terms. It should ensure that proportionate enforceable controls are in place to cover key current and potential risk areas such as OneDrive use. This should be done in conjunction with work to improve behaviours rather than in isolation, and storage levels should continue to be monitored. It should consider putting in place a project to address email archiving, email management, the proliferation of shared mailboxes and records capture. Within the IMA programme, the work conducted by organisations including the Welsh Government and HM Treasury may provide a helpful template for this.
- Defra recognises the move to Office 365 as an enabler for the adoption of more efficient and effective working practices, and better sharing of information. However, the core department faces a significant challenge in rolling out the service to its own staff and the other six organisations within the Defra Group that are due to adopt it. It needs to balance its own requirements with differing approaches to information management and policies that have existed to date, including identifying common principles and permitted variations in areas such as content types and retention. Defra will need to ensure that information assurance and information management requirements do not get lost in the midst of what will be a large-scale change piece. It should seek to re-use work already conducted for the SharePoint 2013 roll-out to help minimise business impact and ensure continued engagement. See recommendation 5

Performance heading	Performance rating	Priority
2.2 Digital continuity and IT change	Development area	Medium

Defra's current work to tackle legacy .pst files ahead of the move to Office 365 addresses a specific area of digital-continuity risk. We saw no evidence, though, to demonstrate that Defra is planning on a consistent basis to ensure digital continuity of its information and data. Defra needs to address this and ensure that information and records management, and digital continuity, are considered routinely as a component of IT procurement processes. See recommendation 3

3 Information risk, governance and oversight

Key developments since closure of Defra's last IMA:

- KIM moved from Commercial, Estates and Knowledge to DDTS during the IMA. Staff from the Data Asset workstream of Defra's Data Transformation programme moved into KIM after the IMA in October 2017. This team has been working to ensure Defra's data is managed to a common framework.
- The roles of Local Information Champion and Site Owner were introduced and Defra's programme of information audit's came to an end as resource was moved to support the roll-out of SharePoint 2013.

Performance heading	Performance rating	Priority
3.1 Recognising information risk	Development area	Medium

- To date, risks logged on the KIM risk register and logged through Commercial, Estates and Knowledge monthly reporting processes (prior to KIMs move into DDTS) have focussed on resource and Defra's ability to comply with legal obligations. These include the Public Records, Freedom of Information and Data Protection Acts. Defra has not, however, defined the risk of a failure to manage information and records and the potential impact this may have on their availability. Potential cultural, IT and governance related causes need to be identified. Defra has also not yet defined the risk of a failure to ensure the digital continuity of its information. Both risks need to be captured at an appropriate level centrally to enable escalation in the context of Defra's new risk strategy. To support this there may be benefit in encouraging business areas to formally define the risks raised by poor information and records management practice, including how they will mitigate them.
- Defra should factor information and records management related risks into its information risk policy. This currently focusses on information security related risks including the loss or unauthorised alteration or disclosure of Defra's information assets. See recommendation 4

Performance heading	Performance rating	Priority
3.2 Establishing control	Satisfactory	Low

- At the time of the IMA, KIM consisted of the Library and Information Services, Information Rights, Records and Information Management, and the General Data Protection Regulation (GDPR) project. Interviewees noted that DDTS and KIM were already collaborating on GDPR related plans.
- The SharePoint 2013 roll-out and continued provision of support has resulted in a reduction in resource available within the records and information management team for other work. Defra needs to consider the resource levels required to support roll-out, continued maintenance of Office 365, and the delivery of an effective KIM service, which is working to challenge and improve behaviours. This should factor in devolved networks.
- The current split between administrative (Local Information Champions) and oversight/management (Site Owner) roles is potentially effective. Defra should build on this and establish a mechanism to promote and champion good information and records management practice in general, not simply use of SharePoint. See recommendation 5

Performance heading	Performance rating	Priority
3.3 Providing guidance	Satisfactory	Low

- Information Management policy was reviewed and updated in 2017. A further
 review should be factored into the Office 365 roll out. Defra should consider using
 the review to highlight the responsibility of managers and senior staff for ensuring
 the right records are captured. It should gain board-level sign off for the policy
 and should also indicate how compliance will be monitored, as recommended in
 the Section 46 Code of Practice on the Management of Records.²
- Defra has continued to update its What to Keep desk guide, which now covers EU Exit related material. We saw positive evidence that this guidance was being used by staff, with one Local Information Champion (LIC) in an area that was working with KIM to overhaul their team sites stating they had used it to shorten retention schedules applied to their area's records. Defra has, though, not published What to Keep guidance or retention schedules publicly. This was recommended by Sir Alex Allan in his 2014 Records Review report and should be addressed.³
- In line with recommendations made in Sir Alex Allan's 2015 Review of Government Digital Records report, Defra should also work with private offices to ensure that minsters' comments on submissions and other documents are being

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² http://www.nationalarchives.gov.uk/information-management/manage-information/planning/records-management-code/

³ https://www.gov.uk/government/publications/records-review-by-sir-alex-allan

preserved as well as summaries that are sent to the business.4

• The information and records management team has been proactive in providing tailored support to those Directorates most closely involved in EU Exit related work towards the end of the SharePoint 2013 roll-out. KIM staff delivered user training to all core Defra staff, as well as offering refresher training. Sessions covered records management and What to Keep guidance as well as technical instructions. What to Keep guidance is also promoted during LIC training. While this is positive, new corporate induction processes do not touch on information and records management responsibilities, and had been drawn up without consulting KIM. HR and KIM need to work together to ensure a joined-up process is in place. Defra needs to be sure that new staff, particularly those working on EU exit related priorities, receive a clear steer from the outset. See recommendation 6

Performance heading	Performance rating	Priority
3.4 Measuring Impact	Satisfactory	Low

- LICs are expected to carry out a monthly check on the use and integrity of team sites. Some LICs are doing this, but without a mandate from managers, it is not being prioritised by business areas, and no process is in place for delivering any feedback on performance.
- Defra is reviewing team sites to assess how effectively they are being used and is planning to produce a league table to help encourage engagement. As Defra moves beyond implementation of SharePoint 2013 and into the exploitation phase, it needs to expand and develop its approach to provide assurance on the quality of record capture. This may entail consideration of key risk factors such as email capture or the performance of business areas with high-value information. Among IMA programme members, the performance monitoring model implemented by HM Treasury is a good practice model. See recommendation 7

4 Records, review and transfer

Key developments since closure of Defra's last IMA:

 The inheritance of paper records from the Food and Environment Research Agency (FERA) raised the risk that Defra would be out of compliance.

Performance heading	Performance rating	Priority
4.1 Oversight of records and selection	Satisfactory	Low

⁴ https://www.gov.uk/government/publications/government-digital-records-and-archives-review-by-sir-alexallan

- Well-established good practice approaches are in place for the appraisal of core Defra paper records. Defra should build on these with a view to producing an appraisal report. Defra has limited insight into the contents of its newly inherited legacy of FERA paper records, but is working to address this and working to interrogate them using macro-appraisal principles. In view of the move to consolidate the Defra family, it may be worth defining the risk of further paper or digital legacies being inherited and impacting on the department's ability to keep pace with the 20-year rule transition period.
- Defra holds a small legacy in SharePoint 2007 team sites in addition to the 9TB held in its shared drives. It plans to decommission these once the contents have been reviewed.
- To date, the records and information management team has had limited oversight of Defra's data. The Data Asset workstream's move into KIM offers an opportunity to address this and to define how data will be factored into the records management programme. Defra's data-rich status and aspiration to become a data-driven department make it particularly important that this is addressed. This should be extended to encompass analytical models, including Quality Assurance approaches that are applied. We did not gain assurance that requirements relating to Quality Assurance are being consistently addressed in line with recommendations made in the 2013 review conducted by Sir Nicholas McPherson.⁵ See recommendation 8

Performance heading	Performance rating	Priority
4.2 Implementing disposal decisions	Satisfactory	Low

- Although Defra has yet to begin routine automated disposal of digital information, business areas were encouraged to engage with KIM and dispose of ephemeral material during the migration to SharePoint 2013. It is using The National Archives' Digital Records Object Identification (DROID) file profiling tool to delete pre-2001 digital material earmarked for destruction in its 2014 operation clean sweep project.
- Defra's first digital transfers will be due in 2022. The department has discussed participation in a digital transfer pilot with The National Archives. Plans are on hold currently, awaiting completion of Defra's planned move to Office 365.
- Defra is engaging with The National Archives as it works to define a five-year transfer plan through to the end of the transition period. In year, it had an existing legacy of 8,000 records to process prior to the influx of FERA records. Defra recognises the need to obtain legal cover for retention of around 19,700 of these records and plans to submit an application for a Retention Instrument at the February 2018 meeting of the Advisory Council on National Records and Archives.⁶ See recommendation 8

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⁵ https://www.gov.uk/government/publications/review-of-quality-assurance-of-government-models

⁶ http://www.nationalarchives.gov.uk/about/our-role/transparency/record-transfer-report/

Annex A - Recommendations in full

 Recommendations consist of an overall outcome to be delivered through the period of the Defra IMA action plan and a set of supporting actions that will help address the recommendation.

Medium-priority recommendations

1

Defra to bring information and records management practice within scope of KIM vision statements and establish a plan to develop and maintain the right information management culture. Active and visible support of senior management is needed to promote change.

This would be supported by:

- Formally appointing a senior champion for information and records management to sponsor key communications and campaigns and provide visible leadership, including leading by example.
- Ensuring KIM vision statements are built into DDTS planning and formally aligned to Defra Group strategic objectives. The relationship between KIM visions and the Office 365 adoption strategy vision should be clarified.
- Factoring information and records management into Director's assurance statements as done by departments in the IMA programme including the Foreign and Commonwealth Office.
- Updating the annual personal commitment statement to provide more effective coverage for information management.

2

Defra to deliver greater support and challenge to IAOs, ensuring key threats are surfaced consistently. This report places particular emphasis on those related to lifecycle management and digital continuity.

This would be supported by:

- Ensuring a central steer is provided to new IAOs on the requirements of the role and establishing Defra specific guidance. This should include adapting the IAO Handbook, following the example of IMA programme members such as the Ministry of Justice.
- Engaging with the KIM team to identify what lifecycle and digital continuity related factors should be captured on the Information Asset Register.
- Drawing on models used by other IMA programme members such as the Department for Transport and Department for Education to enable a more structured approach to IAO reporting and risk assessment.

3

Defra to identify digital continuity priorities to ensure the usability of digital information and embed these in KIM planning.

This would be supported by:

- Factoring consideration of information and records management and digital continuity into IT procurement.
- Promoting use of the IMA programme's Self-Assessment Questionnaire to members of the Defra Group as a means of benchmarking capability.
 Doing this now will help assess preparedness for migration to Office 365 and identify any digital legacy related risks.

4

Defra to define the risk to the department and wider Defra Group of a failure to manage information and records effectively and a failure to ensure digital information remains usable. Mitigating actions and monitoring mechanisms should be established.

This would be supported by:

- Factoring information and records management related risk into Defra's information risk policy.
- Embedding definitions at a proportionate level within the DDTS risk reporting framework, including mitigating actions.
- Encouraging business areas to define the risks that poor information management practice raise.

Recommendations to maintain a satisfactory rating

5

Defra to maintain the priority currently attached by Office 365 plans to information management and information assurance, ensuring opportunities to strengthen governance and embed good practice are taken.

This would be supported by:

- Reviewing Defra's policy on restricting personal storage and ensuring proportionate enforceable controls are in place now and for potential risk areas such as OneDrive.
- Providing targeted support to staff in addition to this to help drive the right behaviours in key areas such as email management, Vault usage and records capture. Welsh Government's project to tackle archived emails and improve email management may be helpful.
- Ensuring ongoing focus on actions taken by LICs and staff to support effective application and implementation of retention schedules.
- Reusing work already conducted for the SharePoint 2013 roll-out and learning lessons.

- Including KIM membership on DDTS governance boards.
- Identifying how the implementation and embedding work and delivery of a KIM service will be resourced and supported. This needs to include use of devolved networks, with consideration given to the provision of administrative support as well as active championing of good practice in overall terms.

6

Defra continue promoting information and records management policy and supporting guidance. This should be reviewed before the introduction of Office 365 to ensure an effective mandate is established for teams and individuals.

This would be supported by:

- Engagement between HR and KIM to establish a joined up process for coverage of information management during induction.
- Publishing What to Keep or other retention guidance publicly, as recommended in Sir Alex Allan's 2014 Records Review report.
- Working with private offices to ensure original ministerial comments are being captured as part of the record.
- Following good practice principles established by the Section 46 Code of Practice such as Board level sign off. Policy should ideally establish the role of individuals, managers and senior staff in making sure information is managed effectively.

7

Defra to build on the positive start made through team site reviews and establish a new performance monitoring model that can be developed and embedded over the long term.

This would be supported by:

- Drawing on the good practice approach implemented by HM Treasury, which factors in senior accountability and use of statistics.
- Incorporating qualitative as well as quantitative measures.

8

Defra to maintain the priority currently attached to meeting the requirements of the 20-year rule transition period.

This would be supported by:

- Establishing an appraisal report.
- Continuing to engage with The National Archives as it defines a deliverable five-year-plan, ensuring it has capacity to keep pace with the transition to the 20-year rule.

- Defining the risk to Defra's ability to comply with 20-year requirements if further legacies in all paper or digital format are inherited due to machinery of government changes.
- Identifying how data and use of analytical models can be factored into Defra's information and records management approach
- Including maintenance of function pages in team site reviews.