

# Information Management Assessment

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Action plan progress  
review

UK Export Finance

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Working with government  
to raise standards in  
information management

## Contents

<b>Background</b>	<b>2</b>
<b>Progress to address recommendations and risk areas</b>	<b>3</b>
<b>Next steps</b>	<b>14</b>

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## Background

The Information Management Assessment (IMA) programme is the best practice model for government bodies wishing to demonstrate commitment to the principles of good information management.

The UK Export Finance (UKEF) IMA took place in 2014. We conducted interviews at the department's London office on the 14<sup>th</sup> and 15<sup>th</sup> January 2014. UKEF produced a detailed action plan and we formally assessed progress against this in July 2015. The IMA report and action plan are both published on The National Archives website.<sup>1</sup>

This progress review summarises key developments since the IMA. Areas where continued attention is still needed are listed below under 'Next Steps.'

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<sup>1</sup> <http://www.nationalarchives.gov.uk/information-management/manage-information/ima/ima-reports-action-plans/>

## Progress to address recommendations and risk areas

### 1 The value of information

Performance rating	IMA 2014	Review 2015
Communicating and realising value	Development area	Satisfactory
Managing information as an asset	Development area	Progressing towards good practice

#### Situation at the time of the IMA in January 2014

UKEF did not have an information strategy and needed to develop an overall strategic vision and set of goals for its information and records and ensure that this was aligned in support of the department's overall business vision.

The department had taken the decision to end its historic print-to-paper approach for records. To help establish a new mandate for digital information and records management, UKEF needed to provide clear direction. This needed to include guidance and support for staff as well as a strong and consistently expressed statement on the value of information and records conveying how information and records management supports and enables the achievement of the department's business goals.

UKEF's Freedom of Information (FOI) response rates had been variable and it only published a limited amount of public data. It was recommended that UKEF take a more proactive stance on FOI and open data which would increase awareness of the department and the services it offers, and would aid open government.

UKEF had taken some positive steps to develop a governance framework for its information assets but needed to build on the foundations already in place and develop a formal information asset register (IAR) that could act as an overall management tool and provide greater oversight and control. This would help the

department to maintain the digital continuity of its information assets, identify key risks and ensure they are being utilised to best effect.

UKEF has developed an Information strategy which was reviewed by The National Archives, signed off by the Executive Committee and published on UKEF's intranet. The Information Charter has also been updated. An Information Management Communications Plan has been devised alongside this to 'help develop and encourage a greater understanding of UKEF information and records management processes.' The plan covers all aspects of work relating to information management and activities on here include:

- launching the Information Management Strategy to the Senior Management Team and Departmental Records Management Officers (DRMO)
- publishing a team briefing article on the Information strategy
- publishing new requirements for information and records management on the intranet.

This will eventually link into a communications plan for the Electronic Document and Records Management System (EDRMS) project.

In line with our recommendations, the information strategy includes a statement of intent in relation to publication of information and UKEF's responsibilities under the Freedom of Information (FOI) Act. UKEF has continued to receive a relatively low volume of requests under the FOI Act. However, the department has developed an FOI dashboard, which also covers Parliamentary Questions and Ministerial letters, to help provide an overview of performance. UKEF's FOI performance has remained consistent with the overwhelming majority of requests answered within the statutory timeframe. A new process for publishing FOI responses is currently being drafted but is not yet complete.

The Senior Information Risk Owner (SIRO) is keen to push forward work on records management and sees this as very important. The SIRO recognised that the Knowledge and Information Management (KIM) team have made a good start in successfully communicating the importance of information management across the

department but now need to support this by embedding the role of the Information Asset Owner (IAO) and implementing a coherent set of EDRM systems. UKEF will have a new Chief Executive Officer (CEO) in the autumn and recognises the need to ensure that they are briefed on the importance of information and records management and UKEF's work around this.

UKEF has put considerable effort into updating its IAR to make it a more useful tool for the management of information assets. For example, it now includes retention information and information around the management of digital continuity. The department has moved away from just listing IT systems as information assets. It now has a much more detailed understanding of its information assets and asset clusters, which have been identified and catalogued. In pulling together the updated register the KIM team has visited all IAOs. There have also been workshops, including one from The National Archives' Information Assurance and Cyber Security Programme (IACSEP), to train them on the IAR and their responsibilities around this. Most IAOs attended these with their supporting staff and the new IAR has almost been completed. The department also took the time to research and look at what other organisations are doing. It is yet to decide how often the IAR will be updated but thinks it is likely to be every three to six months.

The SIRO plans to build on this work by reviewing the IARs as a whole to see how they join up. The department will also review the information that has been captured and the way it is being exploited.

The department has developed terms of reference for the IAO role, detailing responsibilities, and a letter of assurance which each IAO has to sign annually to demonstrate that they have discharged those responsibilities. This is sent out to IAOs by the SIRO. UKEF has also developed an IAO aide-memoire which includes details of guidance and training courses relevant to the IAO role. In addition the department is thinking about creating a performance objective for IAOs.

## 2 Digital information and supporting technology

Performance rating	IMA 2014	Review 2015
Supporting information through technology	Development area	Development area
Digital continuity and IT change	Satisfactory	Satisfactory

### Situation at the time of the IMA in January 2014

UKEF had yet to define an approach for the disposal of digital information and did not routinely delete information that was stored in personal repositories or shared drives. It was recommended that the department should adopt an approach that will allow it to apply data management and digital disposal principles to the technology environment as a whole. It also needed to make proportionate use of management rules within shared drives and apply functional limits to email accounts.

The assessment team gained a reasonable level of assurance that current governance arrangements support information and records management considerations as a component of IT change. Although phase one of the Electronic Case Management System (ECMS) project did not include disposal, it was within the project plan and the assessment team recognised that the department had followed good practice principles in identifying requirements. It had also clearly targeted the system roll-out on the basis of business need. UKEF needed to continue to support the ECMS as a key part of the overall plan to establish an enabling technology environment.

The ECMS, based on SharePoint, was designed to manage casework. It was gradually rolled out after the IMA and all areas of the business have now been using it for between several months and a year. UKEF is about to undertake a post-implementation review which will start in October 2015 and will be checking how far the system is being used and the quality of the data being inputted. The department

is considering inviting the group from the department for Business Innovation and Skills (BIS), who carried out a health check on the project last year, to be part of this review. We were told that feedback from users has been positive so far and only a few minor teething problems have been identified.

Some of the feedback the team has received concerns emails, for example, the legal team has a high volume of emails that they need to move into the ECMS. They are used to keeping all their emails and previously liked the ease of filing in outlook folders. A piece of software called HarmonIE is used to enable Outlook to connect with the SharePoint ECMS but the process of transferring emails across is more complicated than putting in documents, takes longer and it is not always possible to carry out bulk email transfers. The post-implementation review will also look at how staff are putting emails into the ECMS. In addition, we are pleased to note that UKEF is considering reducing the size of email inboxes, which should act as an incentive for staff to transfer their emails into the ECMS. However, if the problems described above continue this may discourage staff from moving their emails across to the ECMS therefore there is a risk that potentially important email records will be lost. UKEF would benefit from looking at the impact of introducing limits on inboxes by listening to the experiences of other departments with a high volume of email, such as the Department of Health.

A lack of available IT business analyst resource has had an impact on UKEF's planned EDRM project. A brief has just gone to the Change Board which has approved 15 days of business analyst time to scope the project. The Security, Procurement, and Facilities Manager will be the project manager. The delay has enabled UKEF to spend time talking to other departments about their experiences of implementing SharePoint including HM Treasury, Department of Energy and Climate Change and Department of Health, which should help it to adopt good practice and avoid potential pitfalls.

UKEF already has SharePoint which it uses for its ECMS so this will form the basis of the planned EDRM. The department will be using HarmonIE to facilitate email transfer in the new EDRM, as they already do with their ECMS system, but will not



be buying any additional plug-ins to facilitate records management and is planning to use workflows within SharePoint instead. UKEF should learn from the experience of other departments who are using SharePoint for records management without additional software. The department needs to ensure that appropriate resources in place, as SharePoint expertise is crucial to the success of this approach. The department does have two contractors with SharePoint expertise and is also recruiting for a SharePoint analyst which should in part help to address this issue.

UKEF has not yet put in place processes for the disposal of digital records. The department needs to ensure that disposal instructions are applied to the ECMS and that this is built into the EDRM from the outset.

UKEF has not yet fully reviewed the structure or content of its shared drives. Responsibility for monitoring shared drives has moved to London following the closure of the Cardiff office. There are limitations to what UKEF can do as there is a reliance on IT for assistance with activities such as deletion. The department recently asked its IT partner to generate a report about what is on the shared drives which revealed that they contain a lot of spreadsheets and duplicate material. Although it is envisaged that work on the shared drives would happen as part of the EDRMS project, the department would benefit from spending time now reviewing and preparing the shared drives for eventual migration to an EDRM. UKEF could potentially use DROID or a similar tool to help them identify the contents of the shared drives.

The department is considering locking down personal drives and will be discussing this with the senior management team. It is hoped that the recommendation will be accepted, as traditionally there has been more resistance to the concept of limits on inboxes rather than restrictions on the use of personal drives.

### **3 Information risk, governance and oversight**

<b>Performance rating</b>	<b>IMA 2014</b>	<b>Review 2015</b>
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<b>Recognising information risk</b>	<b>Satisfactory</b>	<b>Good practice</b>
<b>Establishing control</b>	<b>Satisfactory</b>	<b>Satisfactory</b>
<b>Providing guidance</b>	<b>Satisfactory</b>	<b>Progressing towards good practice</b>
<b>Measuring impact</b>	<b>Development area</b>	<b>Progressing towards satisfactory</b>

### **Situation at the time of the IMA in January 2014**

UKEF had documented a number of information and records management as well as information exploitation related risks on its operational risk register in line with The National Archives' guidance. However, causes and effects were not visible in the documentation viewed by the assessment team which could affect understanding of those risks. It was recommended that they review the likelihood and impact of these risks occurring and ensure that they are given emphasis to separate them from other information security related risks.

The Information Security Assurance Committee (ISAC) represented a potentially robust and useful vehicle for enabling information and records governance. A new reporting line had been established for the Departmental Records Officer (DRO) and new chair for the ISAC. Once established it was recommended that UKEF should review these arrangements to ensure they are providing the department with the right level of oversight. The department also needed to consider how the DRMO network should be positioned as a resource to promote good practice and highlight areas of concern.

The department recognised the need to establish new policy and guidance to support the move to digital information and records management. A culture change was needed to ensure staff trusted new processes to support the availability of information in accordance with business need. It was recommended that UKEF develop a communication plan to allow the department to drive understanding and

engage its IAO network and other senior staff to sell the benefits of new ways of working.

UKEF had not identified performance measures for information or records management and no reporting requirements had been defined for DRMOs. This limited the department's understanding of how information and records were being managed in practice.

The current SIRO took on the role at the beginning of 2014. They have attended The National Archives IACSEP workshops and the Government SIRO has visited UKEF as well. The SIRO does not line manage the Security, Procurement, and Facilities Manager, who is responsible for KIM, but they have established monthly one-to-ones in order that close contact can be maintained.

UKEF has put considerable effort into improving its overall approach to risk management. There are now risk champions within each division. A new operational risk register has been adopted following a series of risk workshops chaired by the SIRO. Risk champions report to the Audit Committee on risks that are above the risk appetite of the Security Committee risk register and have an action log to accompany this. Inadequate management information and/or knowledge and information is on the risk register as having a very high potential gross impact:

- I. Inconsistent, inaccurate and/or incomplete MI could lead to inaccurate reporting/ministerial briefings, poorly informed decision making and material reputational damage*
- II. Ineffective information (records) management could lead to inadequate or inaccurate information impacting daily business activities and management information.*

UKEF has also revised its Security Risk Appetite Statement. This covers information and records management risk and states that:

UKEF has a medium appetite for digital continuity risks. The Executive Committee will want to have annual assurance that Information Asset Owners have processes in place to monitor the digital continuity of all information assets.

UKEF has a medium risk appetite for risks to information. The Executive Committee will want to have annual assurance that guidance and procedures are in place and that training is undertaken by staff.

The ISAC has now been rebranded as the Security Committee. The Security Committee meets quarterly. It is chaired by the SIRO and the Head of KIM is a member. UKEF has also reviewed the committee's membership and brought in more senior members at Head of Division/SCS level. Terms of reference for the committee include a section on 'information', which states that the committee is responsible for:

- *ensuring processes are in place to handle information appropriately in accordance with its sensitivity*
- *ensuring records management policies and processes are in place to ensure electronic and paper records are managed appropriately and digital continuity risks are addressed*

The Records Management Policy has been reviewed and updated to reflect the move from paper to digital records. This has been signed off by the Executive Committee and published on the intranet. The department recognises that it needs updating again to reflect the loss of the Cardiff office and new procedures that have been agreed with Iron Mountain. The KIM pages on the intranet have been updated and related policies have been revised and published internally. For example, they have produced some clear, concise and simple guidance on what to keep as an electronic record and on what emails to keep. This is a great start and UKEF should continue to update and develop new guidance as they embed their ECMS system and to support the rollout of an EDRMS.

The KIM team is working with Learning and Development to put together a training package on SharePoint for both general and advanced users, such as the DRMOs. Once again they are learning from other department's experience and are currently speaking to HM Treasury about their approach to training staff in how to use SharePoint. They are also hoping to be able to reuse some of HM Treasury's training material if it is applicable to UKEF.

UKEF has not yet reviewed the DRMO role. Due to the closure of the Cardiff office, responsibility for overseeing the DRMO role has moved to London. The department also has IT liaison officers in business areas and there is some overlap between these and the DRMO role, for example, IT liaison officers have responsibility for amending the shared drives. Sometimes the IT Liaison Officer is the same person who undertakes the DRMO role and sometimes not. UKEF needs to redefine the responsibilities for this role and establish reporting requirements. This will be crucial to the ongoing work of embedding the ECMS and monitoring its use and in rolling out an EDRMS. DRMOs will also be responsible for ordering back files to and from Iron Mountain. The department has written to senior managers to convey the importance of the DRMO role.

UKEF is yet to establish performance measures and reporting criteria for records management to monitor how far its policies and processes are being adopted in practice across the organisation.

#### **4 Records, review and transfer**

<b>Performance rating</b>	<b>IMA 2014</b>	<b>Review 2015</b>
<b>Oversight of records and selection</b>	<b>Satisfactory</b>	<b>Satisfactory</b>
<b>Implementing disposal decisions</b>	<b>Satisfactory</b>	<b>Satisfactory</b>

## Situation at the time of the IMA

Currently, UKEF only transfers a relatively small volume of files to The National Archives. However, the proactive inclusion of more sensitive case files and the greater obligations on the department due to the 20 Year Rule may impact on work volumes in the future. The move to digital records management will create a new set of requirements for the department's Records Management Unit.

It was recommended that UKEF should, as a component of an overall strategy for information and records management, define a plan for the ongoing review and appraisal of records across all formats. In practical terms, UKEF should seek to promote a mandate for records management that establishes clear standards that the business needs to adhere to and consistent principles when projects, cases and other pieces of work are set up and closed.

At the time of this review UKEF had almost finished closing down their Cardiff office which housed the archive and related staff. All paper records had been moved to Iron Mountain and they had just gone live with the Iron Mountain file tracking system. DRMOs had received training in how to use the tracking system and retrieve files from Iron Mountain. Two UKEF staff originally based in Cardiff have now moved to BIS which has recently transferred its review service to Companies House. UKEF needs to ensure that it has appropriate resource to carry out this work, for example, by exploring options such as shared services.

UKEF has not yet devised a long term plan for ongoing review and appraisal of records in all formats, but recognises that this needs to be a part of the EDRMS project. It does have a good idea of what should be selected having recently updated its Operational Selection Policy. The department does not have a backlog of review and the next big transfer to The National Archives is due in 2020.

UKEF has not started to develop a retention schedule for digital records but needs to ensure that this happens and that disposal instructions are incorporated within the

ECMS and the future EDRM system, flagging any records of historical value that are destined for preservation.

## Next Steps

The National Archives will continue to work closely with UKEF so that the department is supported as it continues its work on information and records management. Outstanding recommendations will be reviewed at the time of the department's IMA reassessment in three to five years time. It is recommended that UKEF focusses on the following as it works to implement its information strategy:

- ensuring that the incoming CEO recognises the importance of information and records management and UKEF's work around this
- continuing to refine the Information Asset Register
- learning from the experience of other departments who are using SharePoint for records management without additional software and ensuring that it has appropriate resource in place as expertise on SharePoint is crucial to the success of this approach
- working with The National Archives as it adopts principles for digital records including application of retention and applying proportionate limits to personal drives/email. Looking at the experience of other departments with a high volume of email and the impact of introducing limits on inboxes, such as Department of Health
- reviewing the structure and content of the shared drives and spending time now preparing them for eventual migration for an EDRM
- continuing to update and develop new guidance as the ECMS system embeds and to support the rollout of an EDRMS
- redefining responsibilities for the DRMO role and establishing reporting requirements as this role will be crucial to success of the ongoing work on embedding the ECMS and in rolling out an EDRMS
- establishing performance measures and reporting criteria for records management to monitor how far its policies and processes are being adopted in practice across the organisation
- securing appropriate resource to carry out work on appraisal, selection and transfer, for example, by exploring options such as shared services
- working with their Information Management Consultant, develop a retention



schedule for digital records and a plan for the ongoing review and appraisal of records in all formats