

Information Management Assessment

Action plan progress
review

Welsh Government

Reviewed

February 2016

Published

September 2016

Working with government
to raise standards in
information management

Contents

Background	2
Progress to address recommendations and risk areas	3
Next steps	12

© Crown copyright 2016.



You may use and re-use the information featured in this report (not including logos) free of charge in any format or medium, under the terms of the [Open Government Licence v3.0](#).

Any enquiries regarding the use and re-use of this information resource should be sent to psi@nationalarchives.gsi.gov.uk

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 Welsh Government IMA took place in 2014. We conducted interviews at Welsh Government's offices in Cardiff, Merthyr and Treforest between 24 and 28 March. Welsh Government produced a detailed action plan and we formally assessed progress against this in February 2016.

The Director Analysis and Business Change, who is now the Welsh Government Chief Digital Officer, was identified in 2014 as the Senior Civil Service level owner for the Welsh Government IMA action plan. We are pleased to note that ownership of the action plan was maintained through significant wider governance changes.

IMA reports and action plans are published on The National Archives website.¹

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

¹ 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 2016
Communicating and realising value	Development area	Progressing towards satisfactory
Managing information as an asset	Development area	Progressing towards satisfactory

Situation at the time of the IMA

Welsh Government was promoting information as a corporate asset in key messages to staff, but it had not established a single strategy or set of linked goals to help drive the management, protection and exploitation of information.

Welsh Government's performance had improved in meeting deadlines for the resolution of enquiries under the Freedom of Information Act, but key documentation relating to transparency and access to information was out of date. Guidance for Information Asset Owners (IAOs) was similarly out-of-date: a one-page job description dated from 2008 and other guidance had missed a 2012 review date and still bore Welsh Assembly branding. Welsh Government needed to clarify IAO responsibilities for the lifecycle management of information assets; we also recommended a review of the structure and content of the Information Asset Register.

Welsh Government has now drafted a 2015-18 information management strategy. At the time of our progress meeting, this had been signed off by the Deputy Director of ICT and the Chief Digital Officer. It was due to be reviewed by the Senior Information Risk Officer (SIRO), who is the nominated strategy owner, and by the Operations Committee, the decision-making body that replaced the previous Operations Group and which now supports the Welsh Government Board.

The draft strategy contains an endorsement by the Permanent Secretary that places information and records creation in the context of the current historic opportunities available to Welsh Government to develop public services the 'Welsh Way'. The document sets out the benefits of good practice in information management to the individual, the organisation and the public. It also establishes Welsh Government's vision for information management, which builds on its existing eight-stage information lifecycle, established by its information and records management policy: 'Create, Assure, Use, Store, Access, Share, Publish and Dispose'. As a consequence, the vision encompasses outcomes for the protection and exploitation of information as well as its management. We are pleased to note that this same lifecycle is also now referenced in the Welsh Government information security policy, indicating that a common understanding has been reached on this point.

The draft strategy uses HM Government's seven information principles for the UK public sector to codify Welsh Government's current approach to information management.² A summary of future plans is also provided for each principle.

The practical impact of the strategy will be defined by its implementation through to its scheduled revision date in 2018. However, reference to the strategy in Welsh Government's new draft Open Data Plan provides a good indication of supportive links with other documentation while Permanent Secretary level endorsement demonstrates a strong commitment to taking necessary work forward.

Welsh Government has demonstrated its commitment to information re-use by defining its public task under the Re-use of Public Sector Information Regulations 2015 and publishing a public task statement. The Welsh Government statement clarifies the public task functions clearly, is dated and written in plain English, states that it will allow re-use freely under the Open Government Licence and refers to the complaints process. Few other Public Sector organisations who are not members of The National Archives' Information Fair Trader Scheme have published a public task statement. **This is good practice.**

² The Information Principles provide a framework for the protection, management and exploitation of information and were mandatory until the introduction of the revised Government ICT strategy in 2014: www.gov.uk/government/publications/information-principles-for-the-uk-public-sector

A new template Information Asset Register (IAR) has been developed. Revised headings will allow Information Asset Owners (IAOs) to record detail about their information assets and the way they need to be used. It will also allow IAOs to record key requirements for their management (such as retention periods, business value and business risk) and for maintaining digital continuity. The template has been piloted, but is not yet live; Welsh Government plans to roll it out across all directorates in summer 2016.

IAOs are now appointed at deputy director level and have responsibility for identifying information assets within their areas of responsibility. At the time of our meeting, guidance on the use of the new IAR template had not yet been developed. We are pleased to note, however, that the definition of an information asset in the Welsh Government information security policy has been updated and corrected.

2 Digital information and supporting technology

Performance rating	IMA 2014	Review 2016
Supporting information through technology	Development area	Satisfactory
Digital continuity and IT change	Development area	Development area

Situation at the time of the IMA

We gained a good level of assurance that the Welsh Government electronic document and records management system (EDRMS) iShare was well-run and was providing an environment that met a number of the core requirements set out in the Section 46 Code of Practice.³ This was in contrast to the EDRMS in many Whitehall departments previously reviewed by the IMA programme. However, Welsh Government needed to address the large volumes of information that were held in

³ nationalarchives.gov.uk/information-management/manage-information/planning/records-management-code/

current and legacy shared drives and in Enterprise Vault. Welsh Government had also not applied any functional limits to current email accounts, without which it lacked a key driver for the corporate storage of email.

Welsh Government had not begun any formal planning for digital continuity. It also needed to ensure that digital continuity and records management considerations are routinely factored into the ICT procurement.

Welsh Government's improving email and record keeping project was set up to respond to feedback around the way email is used and to tackle the storage of large volumes of emails in personal and shared mailboxes. Work conducted in these areas has addressed a number of key concerns set out in our 2014 report. The four strands of the project were:

- Better record management
- Improved mailbox management
- Simplified rules, guidance and support
- Standards for email behaviour

Aims of the record management strand included encouraging storage of all records within iShare and restricting access to alternatives locations. The project recognised the need to make it easier for staff to do the right thing and included a six-month behavioural change campaign. A communications plan drove regular publication of news items and updates across a range of locations. **This is good practice.**

The improving email and record keeping project was established under the corporate 'Reducing Complexity' banner with sponsorship from the Permanent Secretary. This gave it visible senior support and placed it in the same context as wider organisational improvement work in areas including the provision of advice to ministers. **This is good practice.** Following completion of the project in spring 2015, a review was conducted to determine its success. This highlighted outstanding areas that should be taken forward through the ongoing improving iShare project.

To encourage storage in iShare, Welsh Government has placed a 1GB size limit on email accounts, with automated deletion of all emails after one year. It hopes to reduce this limit in the future. A limited set of exemptions were identified and temporary solutions were offered to support those with larger mailboxes or legacy information. Operations Group approval was obtained for this work and for work to tackle legacy storage in personal and shared spaces. The post-project review indicates that there has been a 64% increase in iShare use since the introduction of mailbox limits and deletion rules.

Welsh Government plans to use its e-Discovery tool to help interrogate and appraise legacy information held in shared drives - which are now subject to central oversight - and emails previously held in the Enterprise Vault. These records have now been placed into temporary .pst files. An initial trial of the e-Discovery tool on one shared drive has identified a duplication rate of 40%.

Staff were informed that information held in Enterprise Vault would be deleted within a year: they were provided with guidance to help them identify information with business or historic value that should be stored in iShare. The Enterprise Vault is no longer accessible to staff but has been kept off-line to comply with the requirements of the Independent Inquiry into Child Sexual Abuse (IICSA) moratorium on destruction.

We note that the draft information management strategy highlights the need to limit the proliferation of new systems and applications. It also underlines Welsh Government's commitment to enabling digital continuity and reducing related risks. However, there is no specific reference to digital continuity or legacy information in any of the future plans sections.

The draft strategy only mentions digital continuity outcomes in relation to work already undertaken, highlighting, for example the addition digital continuity criteria to the new IAR template. Once the IAR is live, it should enable IAOs to log key context about the availability, completeness and usability of existing information assets, as well as information assets created through the ICT procurement process. Continued

oversight will be needed as the template is embedded to ensure the right insight is being provided.

3 Information risk, governance and oversight

Performance rating	IMA 2014	Review 2016
Recognising information risk	Development area	Progressing towards satisfactory
Establishing control	Satisfactory	Satisfactory
Providing guidance	Satisfactory	Satisfactory
Measuring impact	Satisfactory	Satisfactory

Situation at the time of the IMA

Welsh Government had no information risk policy – a mandatory requirement under the Security Policy Framework. We emphasised the need for a consistent approach across all departments to logging, tracking and managing information risks with potential organisation-wide impacts, including those relating to information and records management. This was needed to ensure the importance of managing these risks was understood; it would also give the Senior Information Risk Owner (SIRO) and Departmental Records Officer (DRO) leverage to ensure that the necessary steps to tackle them are taken.

We recognised the potential benefits of new reporting structures that brought teams responsible for policy and oversight of the EDRMs together within Knowledge and Analytical Services. Welsh Government needed to establish a network and community for its Records Management Support Officers (RMSOs) and to clarify the responsibilities of its Departmental Knowledge and Information Managers (DKIMs), aligning them with information strategy outcomes.

Welsh Government needed to provide 'what to keep' style guidance to staff to help them to identify what information had value. It needed to obtain qualitative and quantitative performance measures to understand how well policy was being adhered to; it also needed to use the insight gained to target areas that were performing poorly.

Welsh Government has not yet finalised its information risk policy, but has updated its information risk appetite statement to reference the role of information management policy and retention schedules. We understand that the Welsh Government Board has also endorsed inclusion of information risk on the corporate risk register. We have been given verbal assurance that this will cover information security and information management related risks. However, sample directorate risk registers supplied for our review indicate that information management related risks are not yet being consistently defined or owned by business areas. One register contained a well-described risk relating to compliance with information security policy, but made no mention of information management policy. In another case, a register contained a risk badged as information management related, but mitigating actions solely covered steps needed to improve information security. We understand that the new single corporate planning tool is expected to help standardise Welsh Government's approach in this area.

Following the 2014 IMA, Knowledge and Analytical Services moved out of the corporate centre and now sits within the Mental Health, NHS Governance and Corporate Services directorate within the Health and Social Services DG group. Based on evidence supplied, the KIM and Security Group Board is providing a forum to discuss information and records management as well as information security related issues. Following completion of the improving email and records keeping project, Welsh Government needs to focus on delivering its information management strategy and providing continued impetus and direction for improvement work. We note that DKIM and RMSO roles have not been reviewed; Welsh Government should revisit the provision of support roles as a priority.

Welsh Government has published its information and records management policy externally.⁴ The web page includes a statement: ‘Compliance enables the Welsh Government to meet its business needs, accountability and governance requirements and protects the interests of the Welsh Government and the rights of employees and the community’. In line with recommendations in Sir Alex Allan’s 2014 *Records Review*, it has also published its retention and disposal schedule.⁵

The draft information management strategy states that Welsh Government will simplify and improve the access to information management guidance that is provided to its staff on the Intranet. Work already undertaken through the improving email and records keeping project has resulted in a single point of reference for guidance on the use of email and calendars, where multiple sets of guidance existed previously. This includes a straightforward ‘what is a record’ statement. However, Welsh Government still needs to provide staff with proportionate tailored guidance to help them interpret the principles set out in detailed retention and disposal schedules. This is needed so that staff can readily identify information with value that needs to be kept.

Reporting by the improving email and records keeping project has given Operations Group a good level of oversight of work to improve capability. **This is good practice.**

4 Records, review and transfer

Performance rating	IMA 2014	Review 2016
Oversight of records and selection	Good practice	Good Practice
Implementing disposal decisions	Satisfactory	Good Practice

⁴ www.gov.wales/about/foi/policies/recordsmanagement/?lang=en

⁵ www.gov.uk/government/publications/records-review-by-sir-alex-allan

Situation at the time of the IMA

The Welsh Government macro appraisal policy needed to be updated, but processes for the appraisal of paper records were well managed and conducted at file-level. Welsh Government had begun to conduct in-life digital appraisal.

To support the timely disposal of records, Welsh Government needed to ensure that retention schedules were being correctly applied to the iShare file plan and that files were being closed routinely. Welsh Government had not documented principles for sensitivity review but was proactively engaging with the digital transfer and digital sensitivity review groups.

In response to recommendations in our report, Welsh Government updated its macro appraisal policy in 2014, with a further review due in 2016. The policy now includes a section on in-life digital review and has been submitted to The National Archives for review and comment.

A sensitivity review statement and a procedure document have been produced to capture and define key processes. In accordance with a recommendation made in Sir Alex Allan's *Records Review*, Welsh Government has also drafted Terms of Reference for an Information and Records Review Panel. Its senior civil service membership is intended to act as the stakeholder element of selection, appraisal and transfer of Welsh public records.

Welsh Government has addressed concerns relating to difficulties in applying trigger dates within iShare by imposing a blanket closure of the whole file plan, linked to electoral sessions. It planned to open a new file plan in May 2016.

From July 2014, Welsh Government was a key participant in The National Archives' Digital Transfer Project pilots. These pilots tested processes for appraisal, selection, sensitivity review and transfer of digital records. Welsh language policy records, encompassing the records of the Welsh Language Board and the Welsh Government and its predecessors, were chosen for the pilot transfer. Records were selected at a high level in reference to Welsh Government's official selection policy,

supported by a range of other approaches including keyword searches and searches 'by creator', 'by time' and 'by document type'.

The selected series contained digital records, held on both iShare and the shared drives, and also included legacy paper files brought over to Welsh Government following the Welsh Language Board merger in 2012. Welsh Government adopted a file-by-file approach to sensitivity review, with one member of staff conducting sensitivity reviews for 17 paper files and 239 digital files over a period of three weeks. A different approach is being employed for Welsh Government's second transfer of digital records: this will consist of the records of the 2012 Olympics in Wales and the 2010 Ryder Cup.

Welsh Government demonstrated a willingness to engage, test The National Archives' processes and experiment throughout the project. **This is good practice.** Key lessons learnt from the process were documented in a report intended to help inform the work of the Digital Transfer Project in establishing digital transfer as a business-as-usual process.

Records were transferred in February 2015 and are now stored in series WA 11, 12 and 13. This marks the first formal digital transfer of public records to The National Archives and we note that the project benefitted from Welsh Government's participation and input.

Next Steps

Welsh Government has fully addressed recommendations 2 and 12 and has addressed significant elements of all remaining recommendations. The National Archives will continue to work closely with Welsh Government 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, due in 2018-19.

To fully address remaining concerns, Welsh Government should focus on the following:

- Agree and deliver a detailed implementation plan for the draft information management strategy. Include the planned work to increase oversight and understanding of legacy digital information within this implementation plan. Sir Alex Allan's 2015 *Government digital records and archives review* report provides an additional driver for this work.⁶
- Formally define the relationship of the information management strategy to other key documents including the ICT strategy and open data plan. To support this, and fully address our recommendations, Welsh Government should clarify whether the draft strategy is intended to drive improvements in the protection and exploitation of information, or whether it is primarily intended to demonstrate how achievement of information management goals will support and enable work in these areas. This is currently unclear.
- Ensure that the new ICT strategy links to the information management strategy and adopts the single information lifecycle.
- Define how Welsh Government will work to ensure the digital continuity of its records. In practical terms, Welsh Government needs to monitor completion of digital continuity columns within the new IAR template to ensure that the right context is being collected, including requirements identified through the ICT procurement process.
- Finalise the information risk policy to provide a clear definition of the information and records management related risks that Welsh Government faces; deliver the planned improvements to risk reporting noted above.
- Work with the business to develop simple, tailored guidance to help staff know what to capture and keep, helping them interpret the detailed principles established by the Welsh Government retention and disposal schedule.
- Complete the planned reviews of support roles.
- Establish information and records management reporting criteria to ensure that the Operations Committee has an overview of progress of work to improve performance, manage risk and deliver the Welsh Government

⁶ www.gov.uk/government/publications/government-digital-records-and-archives-review-by-sir-alex-allan

information management strategy. Formal reporting requirements for the strategy should be established.

The IMA team will now pass responsibility for monitoring progress against outstanding recommendations to the Welsh Government's Information Management Consultant. This will be done as a component of regular strategic information management meetings between Welsh Government and The National Archives.