Leeds City Council
Information Governance Governance Policy
Introduction

1.1. Information is a corporate asset, which is of extremely high value to the council, and as such it must be protected and managed correctly. Information enables the council to operate effectively, to be transparent and accountable for its actions, and therefore effective management of this information is crucial.

1.2. A fundamental area of work which will enable the council to manage information correctly is ‘information governance’, which is concerned with the creation and implementation of policies, procedures, processes and controls to manage information to support the immediate and future regulatory, risk, environmental and operational requirements of the council.

1.3. This policy is part of a set of information governance policies, procedures and strategies that support the delivery of the Information Governance Framework, and should be read in conjunction with these associated policies. A list of policies, their key messages, and all relevant documents can be found on the ‘managing information’ toolkit.

2. Scope

2.1. This policy applies to everyone who has access to the council’s information, information assets or IT equipment. These people are referred to ‘users’ in this policy. This may include, but is not limited to employees of the council, members of the council, temporary workers, partners and contractual third parties.

2.2. This policy covers information and records created and held in all physical and electronic formats, including, but not restricted to:

- Paper;
- Electronic / digital documents, including scanned images, databases and spreadsheets;
- E-mail and voice mail;
- Information held in blogs, wikis and discussion threads, and in other social media when used for business purposes, such as Twitter;
- Visual images such as photographs;
- Microform, including microfiches & microfilm;
- Information stored on removable media, such as audio and video tapes, memory sticks, CDs, DVDs and cassettes;
- Published web content (Intranet/Internet/Extranet).

This policy will also cover formats that are developed and used in the future.

3. Definitions

Definitions of the specialist terms which appear in the text of this policy can be found in the ‘jargon buster’ section of the Intranet.
3.1. Any documents referenced within this policy can be obtained by contacting the Information Governance Team on InformationGovernance@leeds.gov.uk.

4. Aims/ Purpose/ Objectives

4.1. This aim of this document is to provide a high-level policy statement on information governance.

5. Policy Statement

5.1. It is council policy that all users will take responsibility for managing information in accordance with the Information Governance Framework, and with all corporate policies, procedures, and guidance developed to support that framework. The framework outlines the rationale and objectives for six key information management areas, and the policies and procedures required to deliver the outlined rationale. The framework also outlines information governance needs, roles and responsibilities, the policy and compliance environment, and provides a glossary of terms.

5.2. Supporting policies include the following:

- Clear Desk & Clear Screen Policy
- Data Protection Policy
- Electronic Communications Code of Practice
- Freedom of Information Act/ Environmental Information Regulations Policy
- ICT Equipment Disposal Policy
- Information & Data Quality Policy
- Information Risk Management Policy
- Information Security Incident Management & Reporting Policy & Procedures
- Information Security Policy
- Information Sharing Policy
- Information Systems Acceptable Use Policy
- Information Systems Monitoring Policy
- Password Management Policy
- Protective Marking & Asset Control
- Records Management Policy
- Records Retention & Disposal Policy
- Remote Access Policy
- Remote Working Policy
- Removable Media & Mobile Computing Policy
- Social Media Code of Practice

5.3. All users of council information systems will:

- recognise the value of information as an asset to the council, and manage it according to its value;
- Lead and foster a culture that values, protects and uses information for the public good;
- regard and treat information as a Leeds City Council resource, which is owned by the council and not by Directorates, Services or individual employees;
- take personal responsibility for information management as outlined in the Information Governance Framework, and in accordance with council policies and procedures, with relevant legislation / regulations and best practice guidance;
- obtain information fairly and lawfully;
- ensure that information is accurate and fit-for-purpose;
- share information appropriately and lawfully;
- ensure that information is securely held and protected appropriately at all times;
- use information effectively and ethically;
• make efforts to ensure information is open and accessible, recognising the importance of information in ensuring the accountability and transparency of the council.

5.4. Officers with responsibility for information governance within each strategic directorate will have authority to produce local guidance where necessary and relevant for services in their area of responsibility. Where this occurs, such local guidance will be in accordance with all relevant corporate policies and procedures.

5.5. A summary of the key messages of this policy can be found in appendix A.

6. Legislative Context

6.1. Information governance sits within a legislative background and a number of Acts of Parliament and international standards influence this policy. Users of council information systems must be familiar with the relevant legislation relating to Information Governance and Data Protection, and must be aware of their responsibilities under this legislation. Further information about the statutory legislation governing aspects of the council’s information governance arrangements can found by following the link from the ‘managing information’ toolkit.

6.2. It should be noted that in some circumstances, instances of misuse may constitute a criminal offence.

7. Roles and Responsibilities

7.1. It is important that all users (as defined in the scope of this policy) understand what is required of them and comply with this policy.

7.2. Detailed descriptions of information governance roles and responsibilities can be found on the ‘managing information’ toolkit.

8. Training

8.1. Appropriate training will be made available for existing staff that have responsibility for information governance duties.

8.2. All staff will be made aware of their obligations for information governance through effective communication programmes.

8.3. Each new employee will be made aware of their obligations for information governance during an induction-training programme.

8.4. Training requirements will be reviewed on a regular basis to take account of the needs of the individual, and to ensure that staff are adequately trained.

9. Policy Compliance and Audit

9.1. Failure to observe the standards set out in this policy may be regarded as serious and any breach may render an employee liable to action under the council’s Disciplinary procedure, which may include dismissal. The Disciplinary procedure is part of the Local Conditions of Employment. Any disciplinary investigation resulting from a breach of this policy will be undertaken by the line manager.

9.2. Non-compliance with this policy could have a significant effect on the efficient operation of the council and may result in financial loss and an inability to provide necessary services to our customers. The council will undertake audits as required to monitor compliance with its information governance policies.
9.3. Occasionally there may be situations where an exception to one of the council's information governance policies is required. Exceptions may be granted but they will be risk assessed on a case-by-case basis. Details can be found within each individual policy, or by contacting the Information Governance team on InformationGovernance@leeds.gov.uk.

9.4. Any user who does not understand the implications of this policy or how it may apply to them, should seek advice from their immediate line manager and/or their directorate’s Records Manager, Information Compliance Officer or the Corporate Information Governance team.

10. Policy Governance

10.1. The following table identifies who within Leeds City Council is Accountable, Responsible, Consulted or Informed with regards to this policy. The following definitions apply:

- **Responsible** – the person(s) responsible for developing and implementing the policy.
- **Accountable** – the person who has ultimate accountability and authority for the policy.
- **Consulted** – the person(s) or groups to be consulted prior to final policy implementation or amendment.
- **Informed** – the person(s) or groups to be informed after policy implementation or amendment.

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<td><strong>Responsible</strong></td>
<td>Chief Officer, Intelligence and Improvement</td>
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<tr>
<td><strong>Accountable</strong></td>
<td>Senior Information Risk Owner (SIRO) - Assistant Chief Executive, Planning, Policy and Improvement</td>
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<td><strong>Consulted</strong></td>
<td>Information Governance Management Board (IGMB).</td>
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<td><strong>Informed</strong></td>
<td>All users and persons with management or oversight responsibility for users.</td>
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11. Equality Impact Assessment

11.1. Equality and diversity issues have been considered in respect of this policy and it has been assessed that a full Equality Impact Assessment is not required as there will be no adverse impact on any particular group.

12. Policy Review and Maintenance

12.1. This policy will be reviewed annually, or as appropriate and in response to changes to legislation or council policies, technology, increased risks and new vulnerabilities or in response to security incidents.

13. Declaration

As part of the consultation process this policy has been endorsed by the Council’s, Information Governance Management Board. In accordance with the Council’s Information Governance Framework this policy is formally adopted as a Council policy.

James Rogers
Assistant Chief Executive (Planning, Policy & Performance)
Appendix A: Policy Overview and Key Messages

Policy Overview
The aim of this policy is to provide an over-arching statement about the council’s approach to the governance of its information. It aims to promote best practice and to link together the suite of policies under the Information Governance Framework which relate to specific aspects of information management, such as information sharing.

Key Messages
All users of council information systems will:

- recognise the value of information as an asset to the council, and manage it according to its value;
- Lead and foster a culture that values, protects and uses information for the public good;
- regard and treat information as a Leeds City Council resource, which is owned by the council and not by Directorates, Services or individual employees;
- take personal responsibility for information management as outlined in the Information Governance Framework, and in accordance with council policies and procedures, with relevant legislation / regulations and best practice guidance;
- obtain information fairly and lawfully;
- ensure that information is accurate and fit-for-purpose;
- share information appropriately and lawfully;
- ensure that information is securely held and protected appropriately at all times;
- use information effectively and ethically;
- make efforts to ensure information is open and accessible, recognising the importance of information in ensuring the accountability and transparency of the council.
- Officers with responsibility for information governance within each strategic directorate will have authority to produce local guidance where necessary and relevant for services in their area of responsibility. Where this occurs, such local guidance will be in accordance with all relevant corporate policies and procedures.
- All users should be aware of their responsibilities in respect of this policy;
- Relevant training will be made available to employees. Once training has been delivered, then failure to observe the standards set out in this policy may be regarded as serious and any breach may render an employee liable to disciplinary action, which may include dismissal. The Disciplinary procedure is part of the Local Conditions of Employment.
- All employees should be aware that there is an Information Compliance Manager, Records Manager and Data Protection/ Freedom of Information Practitioner for their directorate, and a local information officer for their service, who are able to advise on information governance issues;
- Non-compliance with this policy could have a significant effect on the efficient operation of the council and may result in financial loss and an inability to provide necessary services to our customers.
- Where there are justifiable reasons why a particular policy requirement cannot be implemented, a policy exemption may be requested by following the policy exemption process.
## Appendix B: Revision History

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<td>20.02.12</td>
<td>First Draft</td>
<td>Katie McNeill</td>
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<tr>
<td>0.2</td>
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<td>23.02.12</td>
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<td>23.02.12</td>
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<td>Andy Nutting</td>
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<td>29.02.2012</td>
<td>Minor amendments before sending for approval.</td>
<td>Katie McNeill</td>
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<td>06.03.12</td>
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<td>07.03.12</td>
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<td>Finak</td>
<td>09.10.12</td>
<td>Amendments made for publication on new Intranet</td>
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## Review and Approvals

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<td>06.03.12</td>
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<td>Asst CX (Planning, Policy and Improvement)</td>
<td>James Rogers</td>
<td>See DDN form</td>
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