Nottinghamshire County Council

REPORT OF THE SERVICE DIRECTOR FOR CUSTOMERS, GOVERNANCE & EMPLOYEES

INFORMATION GOVERNANCE IMPROVEMENT PROGRAMME: PROGRESS UPDATE

Purpose of the Report

1. To inform Governance & Ethics Committee of progress in delivering the Council's Information Governance Improvement Programme (IGIP).

Information and Advice

Background

2. The Council's IGIP was approved by Policy Committee in June 2017. The Programme was necessitated by a significant change in data protection law which was enacted in May 2018, strengthening the rights that individuals have over their personal data and increasing obligations on organisations that collect and use personal data.

3. The Programme has two phases. Phase One focussed on compliance with the new data protection law and was completed in December 2018. It delivered the requisite policies, procedures and a range of other measures to strengthen the Council's approach to data protection, together with the establishment of an Information Governance Team to take forward compliance work. To ensure ongoing momentum around this work, an annual Information Governance Action Plan was approved by Governance & Ethics Committee in May 2019 and will be subject to quarterly review by the Committee, with the quarter one progress update due in September 2019.

4. Phase Two of the Programme focuses on a Council-wide approach to document management, recognising that a more robust approach to this will strengthen organisational knowledge and record keeping (an objective brought into focus by the Independent Inquiry into Child Sexual Abuse (IICSA)), improve compliance with data protection and other laws and increase business efficiency.

Phase 2 Progress

5. SharePoint is a key element of Microsoft's strategic offering for document storage and management. SharePoint Online, to which the Council is moving as part of its overall

migration to Microsoft Azure and Office 365, adds additional functionality that delivers greater collaborative working opportunities and also includes a number of GDPR-compliant features to support information governance requirements and needs.

6.   It was therefore agreed that Sharepoint would be the technical platform for more robust document management. A Microsoft Gold Partner, QbitKloud, was engaged to undertake a discovery and preliminary design exercise to inform the Council's approach. This work has now completed with QbitKloud producing:

- An executive summary, including recommendations to take the work forward
- A discovery document providing evidence to underpin the recommendations
- A SharePoint Governance Starter Kit, based on information gathered during the discovery exercise

7.   Previously, thinking around document management had centred on the acquisition and roll-out of a electronic document management system which would mean designing and building a solution which would impact every area of the Council's electronic document management – millions of documents, across numerous systems, owned by hundreds of service areas. This 'big-bang' approach would be costly and time-consuming and require significant and more immediate cultural change.

8.   However, a greater understanding of the ever-evolving technological capabilities of Sharepoint mean that the Council's approach to document management could be significantly improved taking a more incremental, multi-faceted approach, over time and learning from good practice.

9.   A number of the Council's service areas have had a long-standing need to share documents and information with external partners. Currently this is achieved via the use of secure encrypted email, but this does not allow for easy collaborative working and also makes document control difficult, for example as multiple copies of a document may exist in different places.

10. A pilot project has been established that will deliver a small number of SharePoint sites for external sharing, together with the necessary policies, procedures, processes and technical standards to provide secure and efficient management and control. For instance, facilitating documents within a site to have information security classifications applied (i.e. protective markings – public; official; official-sensitive); defining the role of SharePoint site owners / administrators; automating the retention of documents in line with the Council's document Retention Schedule etc.

11. This project will enable approaches to document management to be trialled and assessed on a small, low risk scale with participants who will be actively engaged as there is a clear 'what's in it for me?' given the long-standing need for external sharing / collaboration on documents. Learning from the pilot sites will enable will not only create a blueprint so that future external sharing sites can be quickly provisioned but will also identify the policies and standards that can be applied across the Council's documents (excluding key line of business systems such as Mosaic and BMS).

12. The project will:

- gather, assess and prioritise service areas external sharing requirements (a number of these already exist in outline);
- select one or more areas to be included in the pilot (a site for the Midlands Engine Development Corporation has already been established and is being configured in conjunction with a requirements gathering exercise to take account of business, security and data protection needs);
- design, develop, test and implement the required site(s);
- in parallel, define and agree the required governance and control for the sites;
- monitor the usage and effectiveness of the sites and make any technical or process changes necessary as the project progresses;
- produce an assessment and recommendations once the pilot has completed to inform future external site provisioning and wider application.

13. It is anticipated that the project will run until approximately the end of 2019. This timescale takes account of the need to fit work around the overall Cloud Migration Programme and recognises that ICT staff are in the process of professionally developing their Azure / Office 365 and Sharepoint skills through multiple training workshops which will be delivered by Microsoft in July and August. The training is also essential to deliver the project's technical requirements.

14. Given how recently the Council has adopted Azure / Office 365 and SharePoint Online, it is considered that the project requires support from technical specialist(s) who have a track record of successful adoption of this technology within large, complex organisations, like the Council. It is therefore proposed to use some of the agreed budget for the Programme to commission appropriate supplier(s) through a government framework contract on a time-limited basis, which should be more cost effective than entering into individual procurement contracts

15. In addition to the project, a SharePoint Governance Group has been established. This will cover both technical and information governance issues and act as the decision-making body for SharePoint standards and processes. Having a governance group will enable the technical innovations which are currently developed at a local level with limited oversight to be developed in a way which would harness efficiencies for the whole business at the same time as ensuring appropriate information security and data protection measures are in place.

16. Running alongside the the pilot project for external sharing sites, work will be undertaken to review good practice regarding document management, retention and destruction from around the Council. The intention would be to use this to develop general principles, tools and guidance to act as a framework for all parts of the Council on a self-serve basis, tailored to the needs of individual service areas and using technology solutions wherever possible.

17. Given the incremental nature of the proposed approach to document management, the intention is to review progress at the end of each phase of work and plan the approach, costs and benefits of the next phase prior to securing approval to proceed.

Other Options Considered

18. Instead of a pilot project a "big bang" approach, implementing changes across the entire Council at the same time, could have been adopted. However this is considered high risk because this is an area in which the Council has limited expertise and the risk of problems

arising would be significant. Moreover, and as borne out by the Council's own experience and that of others, the "big bang" approach can be overwhelming given its depth and breadth and so creates a mentality where by trying to do everything, little is achieved.

Reasons for Recommendations

19.   Governance & Ethics Committee have previously agreed that work should be undertaken to improve the Council's information governance arrangements. The pilot project and establishment of the SharePoint governance group represent the next steps in that work.

20.   Governance & Ethics Committee has asked for periodic updates reporting progress in delivering improvements in information governance across the Council.

Statutory and Policy Implications

21.   This report has been compiled after consideration of implications in respect of crime and disorder, data protection and information governance finance, human resources, human rights, the NHS Constitution (public health services), the public sector equality duty, safeguarding of children and adults at risk, service users, smarter working, sustainability and the environment and where such implications are material they are described below. Appropriate consultation has been undertaken and advice sought on these issues as required.

22.   Improved information governance is one of the key drivers for the Programme. Data protection and information security will be fully considered in the design and implementation of document management solutions and Data Protection Impact Assessments completed where required.

RECOMMENDATION/S

1)   That members agree to receive a follow up/update report in the next six months and that this be included in the work programme.

Marjorie Toward
Service Director for Customers, Governance and Employees and Monitoring Officer

For any enquiries about this report please contact: Caroline Agnew

Constitutional Comments ([SLB 10/07/2019])

23. Governance and Ethics Committee is the appropriate body to consider the content of this report.

Financial Comments (SES 16/07/19)

24. There are no specific financial implications arising directly from this report. The use of the agreed budget is referenced in paragraph 14 to commission appropriate suppliers. The Information Governance Programme has a budget of £281,000 in 2019/20.

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

- Establishing and Implementing an Information Governance Improvement Programme – Policy Committee (June 2017)
- Information Governance Improvement Programme Update – Governance & Ethics Committee (December 2017)
- Information Governance Improvement Programme Progress Update – Governance & Ethics Committee (June 2018)
- Information Governance Improvement Programme Progress Update – Governance & Ethics Committee (December 2018)
- Information Governance Action Plan 2019/20 – Governance & Ethics Committee (May 2019)

Electoral Division(s) and Member(s) Affected

- All