

# **Information Management Assessment**

## **UK Export Finance**

**Assessed: January 2014**

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## **Statement of commitment**

UK Export Finance is committed to making sure that it manages, protects and exploits the information it holds and works with as part of its corporate obligations.

As evidence of our commitment, I have asked The National Archives to review our processes and systems. The National Archives regularly conducts assessments of Information Management practices and compliance within government departments. The report they produce will help me to support all aspects of Knowledge and Information Management across the department so that our information is appropriately captured, managed and preserved, and information risks and sensitivities are appropriately handled.

I view this as a particularly important piece of work at a time when we are undergoing organisational change which might have an impact on the way we manage information.

David Godfrey

Chief Executive Officer, UKEF

## Assessment background and key findings

### IMA background

The Information Management Assessment (IMA) entailed a detailed review of supporting documentation followed by interviews with senior staff, specialists and practitioners. These were conducted between 14 and 15 January 2014. An additional interview with the department's Senior Information Risk Owner (SIRO) was held on 19 February 2014.

The following report provides a summary of good practice and risks identified in the course of the assessment. IMA reports and departmental action plans are published on The National Archives website and can be accessed at: <http://www.nationalarchives.gov.uk/information-management/our-services/ima-reports-action-plans.htm>

### Executive summary

#### 1 The value of information

<b>Communicating and realising value</b>	<b>Development area</b>
<b>Managing information as an asset</b>	<b>Development area</b>

- UKEF's decision to end its historic print to paper approach for records means that new guidance and support for staff will be necessary. To help establish a new mandate for digitally based information and records management, UKEF needs to provide clear direction. It also needs to provide a strong and consistently expressed statement on the value of information and records. This should clearly convey how information and records management supports and enables the achievement of the department's business goals.

- UKEF has developed a short information security strategy to support the introduction of the department's new Electronic Case Management (ECM) system. UKEF should recognise the introduction of the ECM as one of a number of possible enablers for the management, protection and exploitation of information and records. Rather than focussing on a technology outcome, it should establish an overall strategic vision and set of goals for its information and records. The amount of change that the organisation is currently undergoing makes this particularly important. To gain maximum benefit, UKEF should ensure the strategy it defines for its information assets is aligned in support of the department's overall business vision.
- UKEF currently receives a relatively low volume of requests under the Freedom of Information (FOI) Act. Published statistics indicate that response rates have been variable, and on two out of three quarters in 2013 have been at a level that could trigger monitoring by the Information Commissioner's Office. A review of data.gov.uk and the department's website demonstrates that it currently publishes a limited amount of public data. UKEF should assure itself that it can meet its obligations in the future. UKEF should also ensure that it is taking advantage of opportunities that a more proactive stance on FOI and open data would provide to increase awareness of the department and the services it offers, and as an aid to open government.
- The assessment team recognise that UKEF has taken some positive steps to develop a governance framework for its information assets. However, an organisation's ability to continue to use its information assets as needed can be undermined change, whether technology, organisational or information management. UKEF is currently undergoing all of these. It should therefore build on the foundations already in place and develop a formal information asset register that can 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.

## 2 Digital information and supporting technology

<b>Supporting information through technology</b>	<b>Development area</b>
<b>Digital continuity and IT change</b>	<b>Satisfactory</b>

- UKEF has yet to define an approach for the disposal of digital information and does not currently routinely delete information that is stored in personal repositories or shared drives. The end to the department's print to paper policy provides an opportunity to address this and UKEF must now adopt an approach that will allow it to apply data management and digital disposal principles to the technology environment as a whole. This is crucial to helping the department meet business and legal outcomes for the completeness and availability of information including under the Public Records Act. UKEF must also 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 ECM project does not include disposal, it is within the project plan and the assessment team recognises that the department has followed good-practice principles in identifying requirements. It has also clearly targeted the system roll-out on the basis of business need. UKEF must continue to support the ECM as a key component of overall plans to establish an enabling technology environment.

## 3 Information risk, governance and oversight

<b>Recognising information risk</b>	<b>Satisfactory</b>
<b>Setting direction</b>	<b>Satisfactory</b>
<b>Providing guidance</b>	<b>Satisfactory</b>
<b>Measuring Impact</b>	<b>Development area</b>

- UKEF documents a number of information and records management and exploitation related risks on its operational risk register using template definitions in The National Archives' publication *Managing Information Risk*.<sup>1</sup> However, causes and effects were not visible in the documentation viewed by the assessment team. This may affect understanding of these risks. In light of current levels of technology, organisational and information management change, UKEF should review the likelihood and impact of these risks occurring. It should also ensure that they are given emphasis to separate them from other information security related risks that the department documents.
- The Information Security Assurance Committee (ISAC) represents a potentially robust and useful vehicle for enabling information and records governance. The departure of the previous SIRO has been followed by a new reporting line for the Departmental Records Officer (DRO) and new chair for the ISAC. UKEF should review these arrangements once established to ensure they are providing the department with the right level of oversight. In addition, UKEF also needs to consider how the Departmental Records Management Officer (DRMO) network should be positioned as a resource to promote good practice and highlight areas of concern.
- UKEF recognises the need to establish new policy and guidance documentation to support the move to digitally based information and records management. To help encourage adoption and adherence, this needs to be low barrier and user focussed. A culture change will be needed to ensure staff trust new processes to support the availability of information in accordance with business need. A communication plan would allow the department to drive understanding, and UKEF should also seek to engage its IAO network and other senior staff to sell the benefits of new ways of working.
- UKEF has not identified performance measures for information or records management. No reporting requirements have been defined for DRMOs. This limits the department's understanding of how information and records

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<sup>1</sup> <http://www.nationalarchives.gov.uk/services/publications/information-risk.pdf>

are being managed in practice. UKEF must address this so that it can monitor progress to adopt new policy and consequently manage identified risks relating to the capture, retention and use of information.

#### 4 Records review and transfer

<b>Oversight of records and selection</b>	<b>Satisfactory</b>
<b>Implementing disposal decisions</b>	<b>Satisfactory</b>

- UKEF currently transfers a relatively small volume of files to The National Archives. 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.
- As a component of the overall strategy for information and records management recommended by this report, UKEF should define a plan for the on-going review and appraisal of records across all formats. In practical terms, UKEF should seek to promote a clear 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.



## Highlights table

The following are among the areas of good practice at the time of the assessment specifically highlighted in this report. They include systems and approaches that other government organisations may find helpful in mitigating information and records management related risks:

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|--|
| <ul style="list-style-type: none"><li>• UKEF has adopted an approach to defining core business requirements for its new Electronic Case Management system that is good practice. This builds on a period of business analysis including more than 50 one-to-one interviews. The initial rollout targets users expected to get most benefit from the new system.</li></ul>  |
| <ul style="list-style-type: none"><li>• The Information Security and Assurance Committee (ISAC) acts as the main governance body for information related matters, with a focus on information security and assurance, but including information and records management. The DRO is a standing member with the IT Director and Digital champion. The committee has a recognised function within the department's control framework.</li></ul>   |
| <ul style="list-style-type: none"><li>• UKEF's operational risk register features information management and information exploitation related risks that "critical information is wrongly destroyed, not kept or can't be found when needed" and the risk of a "failure to utilise the value of the information asset". These are highlighted in The National Archives' publication <i>Managing Information Risk</i> and demonstrate that UKEF recognises the potentially significant impact if information and records with value cannot be located or exploited.</li></ul> |
| <ul style="list-style-type: none"><li>• UKEF intends to embed information and records management principles within guidance published for the new ECM. This will help embed information and records management principles and help ensure a consistent message about them is delivered to staff.</li></ul>   |
| <ul style="list-style-type: none"><li>• UKEF has produced an information security focussed induction for permanent, temporary and contracted staff. It covers records management and other topics such as physical security, establishing key principles such as the impact of non compliance with legislation and the need to store information in shared drives rather than outlook.</li></ul>   |
| <ul style="list-style-type: none"><li>• UKEF has agreed an Operational Selection Policy (OSP) with The National Archives, which is published.</li></ul>  |

## Recommendations to address risk areas

Ref.	Summary recommendations
1	<p>UKEF to define an overall strategic vision and set of goals for the management, protection and exploitation of its information and records, centred on the digital continuity principles of <b>availability</b>, <b>completeness</b> and <b>usability</b>.</p> <p>This <b>priority recommendation</b> would be supported by:</p> <ul style="list-style-type: none"> <li>• Developing a communication plan to encourage greater understanding as the organisation seeks to embed digitally-based information and records management.</li> <li>• Alignment with the department's overall vision "to benefit the UK economy by delivering the best possible professional service to UK exporters".</li> <li>• Ensuring that the strategy explicitly covers existing as well as newly created information and records.</li> <li>• Ensuring that goals are time bound and the strategy is accompanied by an implementation plan with measurable milestones.</li> <li>• Engaging the IAO network and using existing management structures such as team briefings to encourage buy-in.</li> </ul>
2	<p>UKEF to ensure that it establishes through its information strategy or other means a clear statement of ambition in relation to compliance with the Freedom of Information Act, open data requirements and the government's transparency agenda.</p> <p>This would be supported by:</p> <ul style="list-style-type: none"> <li>• Alignment with the department's objective of increasing its profile and awareness of the services it provides.</li> <li>• A review of recent performance against FOI targets to ensure the reason for varying response times is understood.</li> </ul>
3	<p>UKEF to build on the foundations already in place for information asset governance, reviewing the level at which it defines its information assets and developing an</p>

information asset register in line with digital continuity guidance to support their management over time and through change.

This would be supported by:

- Basing the information asset register on standard information types, such as those used for the creation of metadata fields or retention schedules.
- Using the Information Asset Register to document usage requirements (for finding, opening, trusting, understanding or working with information assets), value, risks and opportunities for exploitation.
- Using the information asset register to document how technology currently supports UKEF to use its information assets.
- Using this information as the basis to review the suitability of current technology provision, identifying technology related risks and areas where technology is no longer required.
- Ensuring that core principles relating to information asset governance are consistently expressed across all relevant policy, guidance and other documentation such as information risk appetite statements.

4 UKEF to continue to support the ECM project and to provide a technology environment that supports the lifecycle management of digital information and records and enables their protection and exploitation.

This **priority recommendation** should be recognised as a **core information strategy aim**. It would be supported by:

- Defining key actions relating to data management and digital disposal to enable the retention of valuable information and records and deletion of ephemeral content across all corporate repositories including the shared drives and ECM.
- Establishing appropriate functional limits on personal repositories including inboxes to encourage corporate storage and reduce the risk of instability, inaccessibility or loss.
- Reviewing the use and structure of the shared drives and applying proportionate management rules. UKEF should liaise with The National Archives in relation to

	any blanket disposal decisions to be applied to the information stored within them.
5	<p>UKEF to ensure that it expedites the production of a mutually supportive and user-focussed suite of policy and guidance documentation that defines clear requirements for digitally based information and records management.</p> <p>This <b>priority recommendation</b> should be recognised <b>as a core information strategy aim</b>. It would be supported by:</p> <ul style="list-style-type: none"> <li>• Providing a clear, business focussed statement of information's importance to UKEF and the need for it to be managed, protected and exploited in line with its value.</li> <li>• Updating linked policies and guidance such as the Information Security Risk Management policy to reflect new requirements for information and records management.</li> <li>• Ensuring policy and guidance places a particular emphasis on known factors in information and records management related risks including cultural- as well as technology-based causes.</li> </ul>
6	<p>UKEF to ensure increased emphasis is given to information and records management related risks as new policy and new digitally-based ways of working are adopted and embedded.</p> <p>This would be supported by:</p> <ul style="list-style-type: none"> <li>• Giving specific emphasis to information and records management and information exploitation related risks within the operational risk register. The potential causes (including cultural as well as technology-based factors) and effects of these risks should be clearly defined and visible.</li> <li>• Reviewing the impact and likelihood of these risks in light of the move away from the department's historic print to paper approach for records and reflecting this in the department's information risk appetite statement.</li> </ul>
7	UKEF to define performance indicators for information and records management to support understanding of progress towards information goals together with reporting

requirements.

This would be supported by:

- Establishing reporting criteria for the information strategy and identifying how frequently progress needs to be reported.
- Defining the ISAC's role in terms of monitoring digitally-based information and records management performance as the historic print to paper policy is abandoned. UKEF should ensure that related risks are given priority by the ISAC and Internal Audit and the department's IAOs and that escalation routes are in place to raise concerns.
- A review of the DRMO role to identify how it can be best used to encourage good practice in digitally-based information and records management and support IAOs to discharge their responsibility. UKEF should in particular identify what metrics DRMOs could report on to increase oversight, promote good practice and identify risks.
- A review of current governance and reporting lines to ensure the SIRO has the necessary oversight to understand progress in managing this group of risks.

8 UKEF to utilise The National Archives support and guidance in the development of retention schedules for digital disposal, and work to embed disposal according to value as a business as usual activity.

This would be supported by:

- Liaising with the business in the development of tailored retention periods.
- Establishing an enforceable mandate within policy and guidance on required behaviours and consistency around key processes such as file and folder set up and closure, with clear triggers for disposal.
- Regularly reviewing the Official Selection Policy (OSP) and ensuring that it is publicised within the department so that records sets with potential historic value can be routinely identified at the start of projects.
- The definition of a long-term plan for the on-going review and appraisal of records in all formats.

# 1 The Value of Information

## 1.1 Communicating and realising value

Goal: The organisation establishes information's value in principle and supports its realisation in practice

### **Establishing and communicating priorities for information**

UK Export Finance (UKEF) places a priority on information security and uses it as a vehicle to establish corporate priorities for the information it works with and has responsibility for. Interviews held and documentation reviewed gave the assessment team a good level of assurance that UKEF views information and records management as an integral component of information security.

The Information Principles for the UK Public Sector recommends that organisations produce a declaration to establish the value of information to the business. UKEF's 2013 Information Security Risk Management policy provides a high-level statement on the department's duty of care to ensure that "all sensitive and valuable information is protected from unauthorised disclosure, alteration, or destruction". A prominent endorsement of the policy by the current Chief Executive Officer (CEO) also highlights the need to ensure that UKEF's information assets are utilised to support the department's core business activities. The policy notes the potential value of information in enabling "the continued development and provision of products and services to meet the future needs of UKEF and its customers".

UKEF's 2011 records management policy provides a brief outline of the legal and business drivers for records management. These include properly documenting business transactions, preserving an audit trail and ensuring an account of the department's actions can be provided to Ministers, Parliament and other stakeholders. In line with ISO 27001 guidelines, the Information Security Risk Management policy highlights how the risk of destruction, loss or falsification of important records should be addressed via the adoption of

formal records management procedures. Minimal detail is provided, however, and the policy does not list the Public Records Act or FOI Act among the statutory and regulatory requirements that have an impact on information systems.

UKEF is currently moving to end its historic policy of printing records to paper. This will require the establishment of new ways of working. To help establish good practice from the outset, UKEF should ensure staff are provided with a sharper statement of information's value to the department. This should emphasise why information needs to be managed and exploited as well as protected and should be expressed consistently across all relevant policy documentation and guidance. A clear message must be given that reflects business outcomes and underlines actions necessary to ensuring a "single version of the truth" is preserved. As a part of this, the Information Security Risk Management policy should also be updated to state how UKEF's obligations to protect important records will be met once they are in digital rather than paper format. **See recommendation 6**

### **Setting goals for information and its management**

UKEF is one of the smallest government departments, but plays a key role in government policy for achieving strong and sustainable economic growth. In 2012–13, the department provided more than £4.3 billion of support to UK exporters. Senior interviewees recognised the "huge change" that UKEF is currently undergoing, emphasising its speed. The department has recently relocated and it is expanding and hiring new staff. At the same time, its business model is evolving as it positions itself to exploit the new opportunities afforded by the current economic climate. This includes an expansion into direct lending and a growing focus on short-term products.

UKEF has produced a two-page Information Security Strategy, which sets four key security related goals intended to underpin the introduction of the department's Electronic Case Management System (ECM). This represents a good start. However, the introduction of the ECM should be recognised as an enabler for the management, protection and exploitation of information, rather

than an end in itself. The levels of organisational change that UKEF is experiencing and the move from paper to digitally based records management make it particularly important that UKEF establishes an overall strategic vision and set of goals for its information and records. This report recommends that UKEF uses the digital continuity principles of availability, completeness and usability as the focus for this. UKEF should define clear goals for the management, protection and exploitation of information and establish how their achievement will enable UKEF's overall vision statement:

"To benefit the UK economy by delivering the best possible professional service to UK exporters."

UKEF should ensure that the goals it defines cover existing as well as newly created information and records. The Information Principles for the UK Public Sector and The National Archives Business Requirements for Information and Records Management represent useful resources for the development of a strategy. **See Recommendation 1**

### **Enabling public access to information and supporting transparency and re-use**

UKEF publishes a limited range of transparency data, with five datasets listed on data.gov.uk as of 12 March 2014. These consist of more than 90 individual data resources, which are predominantly published in three-star csv and two-star xls format. UKEF publishes an overlapping and more current set of data is published on gov.uk, consisting of seventy individual items.

According to the latest published statistics on the handling of requests for information under the FOI Act, UKEF received 32 requests for information in Q3 2013. This is one of the lowest rates among monitored central government bodies, and the department answered 93.75% of these requests within the 20-day time limit or permitted extensions.

Lower volumes were received during Q1 and Q2 2013. In both cases, however, response rates were significantly below baseline of 85% "within



time" that the Information Commissioner's Office uses to identify organisations that may benefit from a period of monitoring.

The volumes and complexity of FOIA requests may vary and may increase in the future. UKEF should assure itself of the reasons behind the fluctuation in performance during 2013. To be recognised as a proactive, open and transparent department, and to head off repeat enquiries, UKEF should consider publishing responses to FOI requests on its website. In addition, although much information that UKEF holds is likely to be commercially sensitive, it is also likely that the department could usefully be publishing more open data under the Open Government Licence. Doing this may be helpful in supporting UKEF's goal of increasing its profile and increase the market's awareness of the services it offers.

UKEF must set its ambition in terms of FOI and open data and define desired outcomes as a component of its information strategy. **See Recommendation 2**

## **1.2 Managing Information as a Valued Asset**

Goal: The organisation protects, manages and exploits its information assets to achieve maximum value

### **Defining and cataloguing information assets**

Organisations need to know what information they hold, where it is and what functions it supports in order to manage it effectively. They also need to ensure that owners are identified to provide appropriate levels of oversight and accountability.

UKEF has made some positive progress in this regard. In particular, UKEF has sought to use its information asset management approach as an enabler for records management outcomes. The department's records management policy states that information assets contain records. The requirement within disposal schedules for Information Asset Owners to sign off individual

disposal actions demonstrates an intention to follow this through in practice.

The Information Security Risk Management policy provides an open and inclusive definition of an information asset as "business information or data in any format such as electronic, paper or information given over the phone". It also states that "information assets relate to business information primarily produced or used in the course of business within their area of responsibility". In practice, however, UKEF's information assets are documented in broader terms at the level of key systems and areas of responsibility. The department separately holds detailed lists of processes, systems and data contained within each high-level information asset. This approach to defining and cataloguing information assets may not provide UKEF with the right level of granularity to understand the information it holds.

The National Archives recommends the use of an Information Asset Register (IAR) as the basis for an overall governance framework for an organisation's information. It can provide a tool for maintaining digital continuity and helping ensure that information assets remain available, complete and usable as required over time and through change.

UKEF should build on the start it has made by developing an information asset register in line with The National Archives digital continuity guidance.<sup>2</sup> This should be based on standard information types (such as those used for retention schedules or metadata) and document the usage requirements and key risks and sensitivities of the department's information assets. Documenting the purpose and value of information assets would bring added benefit in allowing UKEF to define how they need to be exploited and utilised as set out in the CEO's introduction to the Information Security Risk Management Policy. **See Recommendation 3**

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<sup>2</sup><http://www.nationalarchives.gov.uk/information-management/manage-information/policy-process/digital-continuity/step-by-step-guidance/step-2/>  
<http://www.nationalarchives.gov.uk/documents/information-management/identify-information-assets.pdf>

UKEF should ensure that its definition of an information asset is applied consistently as a part of the planned review of records management policy and guidance documentation (see pp. 29–31). Currently, disposal of records is not referenced in guidance for Information Asset Owners (IAOs), and while information assets are mentioned throughout the Information Security Risk Management policy, they are not referenced in the section covering records. It is also noticeable that while the department references risks relating to its information assets in its corporate risk register it does not reference information assets in its information risk appetite statement. **See Recommendation 3**

## **2 Information and Supporting Technology**

### **2.1 The technology environment**

Goal: The technology environment supports the management, protection and exploitation of information

#### **Corporate storage of information**

Shared drives and specialist financial databases currently form the core corporate repository for digital information. The assessment team is aware that the department has undertaken “clean ups” of the shared drives to identify orphaned files and that some controls have been imposed over this environment. For example, UKEF has established a requirement for individual cases to be moved to a separate part of the file structure on completion to draw a line between historic and current information. Historically, however, the department has applied disposal schedules to records printed in hard copy form only. UKEF has no current strategy for data management and therefore archived digital information including closed files will potentially remain on the network indefinitely.

Interviewees indicated that UKEF undertook a “purge” of Personal Storage Table (.pst) files in the course of its office move and asked staff to transfer files from Outlook to the shared drives. This represents a positive step due to the risk that information stored in this compressed format may not be accessible, may become corrupted, or may be kept for longer than needed. Individual inboxes reportedly range in size up to 2GB, with a current policy of archiving emails at 60 days. As with other digital information, UKEF has no strategy to enable the removal of emails from the department's servers after a set period.

The move away from the print to paper policy provides an impetus to address data management and digital disposal and UKEF now must define how it will manage information and records stored in the digital environment. As a component of the information strategy recommended by this report, UKEF

must have a defined approach for data management and digital disposal. These linked concepts should be established as the means by which the department ensures information with value is preserved while ephemeral information is deleted. UKEF should in particular decide how to maintain email inbox sizes within acceptable limits. This may be achieved by, for example, imposing appropriate functional limits, targeting support to users with particularly sizeable profiles and giving further emphasis to routine email capture according to value in the course of cases and projects. **See recommendation 4**

The retention of digital information may be seen by some to benefit the department by providing a theoretical safety net if records are not captured in paper form. This is not tenable in the long term. Defining an approach to data management and disposal is vital to the management of data volumes and to enable compliance with the requirements of the Public Records, Data Protection and FOI Acts. Without this, UKEF may face unnecessary storage costs and its ability to ensure the availability of information in accordance with value, user need and legal requirements may be significantly undermined. UKEF should refer to The National Archives guidance *Managing Electronic Records without an Electronic Record Management System* to support decision making in this regard.<sup>3</sup> **See Recommendation 4**

### **Finding, accessing and protecting information**

Interviews with staff indicate that the department faces a number of common issues and potential risks that can be associated with shared drive usage. These include varying numbers of file levels, inconsistent version control and naming and a limited search function. Each of these factors may undermine the ability of staff to find, trust or understand information.

The perceived difficulty of accessing emails within the shared drives may be a factor in discouraging staff from storing emails with value in corporate repositories. The potential risks raised by this were recognised by a number of

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<sup>3</sup> <http://www.nationalarchives.gov.uk/documents/information-management/managing-electronic-records-without-an-erms-publication-edition.pdf>

staff at all levels, in terms of single person dependency. Interviewees couched this in terms of concerns whether "the full story" would be known when work was handed over or highlighted the reputational impact for UKEF if full disclosure could not be provided. The potential impact of these risks is likely to be greater in periods of change and development such as that UKEF is going through than in static periods where a bank of knowledge and wider context has been built up.

Senior interviewees recognised that "more responsive kit" was a priority for the department and saw the benefits of the new ECM as including better version control, greater efficiency, better retrieval and cross working and a reduction in duplication. However, while the current phase of the ECM will cover its roll-out to its core users for new cases, the majority of staff will continue to work within the current technology environment for the time being. This includes staff working on existing cases, which are not currently scheduled to be migrated into the ECM and that will therefore continue to be managed within the department's shared drives.

UKEF must provide a suitable environment where staff can work collaboratively and in accordance with policy in overall terms, not just in the ECM. In line with plans for the roll out of the ECM, and to help mitigate the risks raised by the current technology environment, UKEF should review the structure and use of its shared drives. It should plan to make proportionate use of management rules to support the availability of information within these repositories as set out in *Managing Electronic Records without an Electronic Record Management System*. **See recommendation 4**

## **2.2 The Continuity of Digital Information**

Goal: The organisation is taking proactive steps to ensure the continuity of its information, over time and through change

### **Aligning information management and information technology**

The assessment team noted that the DRO sits on the ECM board; this is good practice. Interviewees indicated that good links exist between IT staff and other information professionals within UKEF. This is an important factor in ensuring that decisions taken in relation to technology change are informed by an understanding of information and records management requirements.

UKEF is currently placing an emphasis on ensuring the ongoing resilience and robustness of its systems. The department commissioned an audit to understand the age and format of information stored in its shared drives and identify how much of it might be duplicated and whether any possible savings and efficiencies could be made. This is a positive step, although the shared drives only represent a portion of UKEF's overall digital holdings, and the identification of legacy formats should not be relied on to provide an indication of information that can be deleted as obsolete. UKEF should liaise with The National Archives in any blanket decisions taken related to the analysis it has conducted. **See Recommendation 4**

This report recommends that UKEF goes further and considers how technology supports the usability of information in practice, by mapping the technology dependencies of its information assets in line with The National Archives Digital Continuity guidance.<sup>4</sup> Doing this would help UKEF to help highlight technology related risks and define what business areas, information and functionality are dependent on legacy systems. This would support informed decision making on where to prioritise investment, and allow UKEF to plan for the on-going provision of technology, including identifying any that is no longer needed. **See recommendation 3**

### **Digital continuity and technology change**

The development of UKEF's new ECM and plans for its roll out provided key context for the IMA. The assessment team saw evidence that the department has learned lessons from two previous attempts to introduce content management systems. The team did not review the documented

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<sup>4</sup> <http://www.nationalarchives.gov.uk/documents/information-management/mapping-technical-dependencies.pdf>

requirements, but interviews with staff involved in the project demonstrate that UKEF has adopted a **good practice approach** to defining core business requirements, building on a period of business analysis including more than 50 one-to-one interviews. UKEF has targeted the initial roll-out of the system to the area of the department where most benefit is expected. This was recognised by interviewees who highlighted the opportunities for business intelligence due to "shorter conversations" and "easier links" between teams. The flat implementation of the chosen product would also be helpful in supporting wider roll out.

To ensure that the potential benefits of the ECM can be realised, UKEF must continue to support the project and maintain the priority that has been attached to it. Ultimately, UKEF should position the adoption and development ECM alongside exerting greater control of shared drives as central to plans to achieve the department's strategic vision for its information. **See recommendation 4**

The assessment team understands that only phase one of the project has so far received formal approval, and this does not include disposal. UKEF must ensure that it enables this capability within the ECM as well as the shared drives. **See Recommendation 4**



## 3 Information Risk, Governance and Oversight

### 3.1 Recognising Information Risk

Goal: The organisation defines and manages information risks to minimise threats and maximise opportunities

#### **Documenting and defining information risks**

UKEF has followed through on its identification in current policy of business drivers and legal and regulatory requirements for information and records management by documenting some of the risks the department may face as a result of current practices. The department's operational risk register features a number of risks highlighted in The National Archives publication *Managing Information Risk* relating to the management and exploitation of information. These include the risk that "critical information is wrongly destroyed, not kept or can't be found when needed" and the risk of a "failure to utilise the value of the information asset".

This represents **a good practice approach** and demonstrates that UKEF recognises the potentially significant impact if information and records with value cannot be located or exploited. UKEF now needs to build on this positive start. A key step is to ensure that the potential causes and effects of these risks are visible along with the central risks themselves.

This is vital in driving a full understanding of why these risks may arise, where effort to mitigate them needs to be focussed and what progress UKEF is making in addressing them. In any organisation, a wide range of factors are likely to influence whether information and records are available as needed. These factors will include the systems that are in use. They will also include the manner in which those systems are used, the ability to action disposal schedules for digital records, the routineness with which this is done, the policy and guidance that is set and cultural factors that may impact on

adherence to it such as perceived lack of time or lack of recognition of information's value.

UKEF must review the impact and likelihood of information management and information exploitation related risks occurring in light of the move away from the department's historic print to paper policy for records. UKEF should also ensure emphasis is given to these risks within the operational risk register so that they can be more easily monitored and tracked as new ways of working are embedded. **See recommendation 6**

### **Implementing an Information risk management approach**

The General Counsel was appointed as SIRO on 31 January 2014. The assessment team are assured that the role has been allocated at an appropriate level and that the department is in the process of arranging training to ensure the General Counsel can carry out their role as SIRO.

UKEF seeks to embed the management of security related risks within standard business processes through Risk Management and Accreditation Documentation Sets. These do not cover information and records management related risks. This fact together with the lack of local risk registers, which could be used to document project or programme level information risks, may mean that these risks do not yet have the right profile within the business. It may also impact on the escalation of these risks and staff's understanding of the role that adhering to corporate policy plays in their management. This was born out in interviews with staff who showed a good business-focussed awareness of information's importance and the need to protect it, but did not necessarily recognise specific requirements set out in current policy or guidance, or any corporate mandate to follow it.

The internal audit team's focus on document management represents a key tool for raising and maintaining the profile of records and information management related risks on a team-by-team basis. Weight is added to findings by publishing audit reports on the intranet and requiring managers to report to Executive Committee on the implementation of actions. The

assessment team understands that the department's Information Security Assurance Committee (ISAC) plays a practical role in reviewing the department's information assurance risks. UKEF should use the ISAC and internal audit team to ensure sufficient priority is given to information management and information exploitation related risks. UKEF should ensure that escalation paths are defined and that the department can understand progress to reduce these risks and easily identify areas of concern. **See recommendation 7**

### **3.2 Establishing control**

Goal: The organisation has effective governance structures in place that foster communication and strategic planning

#### **Governance structures**

The role of DRO has been allocated to the Departmental Security Officer (DSO). The department has no knowledge and information management team, but the DRO is supported by a deputy DRO and archive manager who heads up the Records Management Unit (RMU).

The DRO reports to the director of the Project Management Office (PMO) who is also the ISAC chair. This was a new reporting line at the time of assessment, following departure of the previous SIRO and director of HR. The DRO is a standing member of the ISAC along with the IT Director and Digital champion. This is a **good practice approach**. The ISAC acts as a centre of excellence and is the main governance body for information security and assurance related issues. The committee has a recognised function within the department's control framework, and is intended to provide robust challenge to established ways of working.

The assessment team understands that there are plans to review the ISAC's terms of reference. To ensure that the committee can support strategic information priorities to best effect, this report recommends that the new terms

of reference should be defined in line with the department's information vision. They should also specifically define the committee's role in terms of monitoring information management and information exploitation related risks as new working practices are adopted.

The ISAC has a direct reporting line to the Executive Committee. This is **good practice** and provides a potentially effective reporting structure for information and records management related issues. UKEF should assure itself that this also provides the current SIRO with the insight they need to discharge their responsibilities. **See Recommendation 7**

### **Supporting the business**

The DRO has a relatively high profile within the department and has an active role in communicating security priorities to the department, which provides a good base from which to promote new policy.

The lack of a central knowledge and information management limits the department's capacity for outreach and oversight. This increases the importance of the ISAC's governance role and the establishment of clear parameters for staff. It also increases the importance of having efficient support networks in place.

Interviews with staff gave the assessment team assurance that Divisional Records Management Officers (DRMOs) are involved in disposal of paper records and have been used in shared drive house-keeping exercises. The assessment team also understand that the DRO and deputy DRO have put in place a forum for the DRMOs. This meets on a quarterly basis and has been used to highlight current priorities and key issues such as the forthcoming introduction of the CSM.

UKEF records management policy states that DRMOs are to be appointed by directors who will agree their duties in line with records management guidance. In practice, interviewees were aware of the DRMO role, but were

not clear on its function beyond helping to save physical space by sending paper records to the records store.

The current template DRMO role description does not list any formal responsibility in terms of digital information management and does not define or emphasise how DRMOs support directors in their role as IAO. UKEF should take this opportunity to conduct a review of the DRMO role to define how it needs to be used, what benefit it can deliver to department and to the IAO network and how it needs to work with other roles such as the divisional IT Liaison Officer role. The DRMO role could usefully be aligned with a number of outcomes including supporting the routine disposal of digital records, promoting information and records management priorities to staff, promoting good practice principles and highlighting areas of bad practice or concern. **See recommendation 7**

### **3.3 Providing direction**

Goal: The organisation gives staff the instruction they need to manage, protect and exploit information effectively

#### **Knowledge and Information management policy and guidance**

The UKEF records management policy has been updated on a piecemeal basis since it was drafted to reflect changes in legislation and government policy. UKEF recognises that it needs to overhaul existing documentation and establish new parameters for the management of digital information and records.

UKEF has expressed an intention of embedding records management principles within user guidance for the new ECM. This represents a **good practice approach**. In line with The National Archives' Business Requirements for Managing Digital Information and Records, UKEF's new policy should be user focussed to minimise barriers to its adoption and help

reduce risks that staff will seek alternative ways of working. **See recommendation 6**

Although the UKEF records management policy notes the retention of corporate knowledge, information and 'tribal memory' as a driver for records management, UKEF has no formal mechanism for knowledge capture and knowledge transfer. UKEF should address this as a component of the overall overhaul of policy and guidance. UKEF may benefit from liaising with other departments in the IMA programme that have been recognised as making improvements in this area such as DECC and Defra. **See Recommendation 6**

### **Establishing principles for digital disposal**

UKEF's disposal schedules for paper records were developed in consultation with The National Archives. Schedules are established at divisional level and retention periods defined to reflect statutory requirements and the experience of users. UKEF now needs to establish new principles that can be applied to digital records.

Policy and guidance in this area should give coverage to the known potential factors in the risk that "critical information is wrongly destroyed, not kept or can't be found when needed". This includes establishing the principle of corporate ownership, emphasising emails as a part of the corporate record and audit chain and addressing issues relating to version control, multiple handling and duplication. **See recommendation 6**

The efficient application of disposal schedules for digital information will help UKEF ensure that information and records that need to be captured are captured where they need to be and retained as long as necessary. It will also help ensure that the information that shouldn't be captured isn't, which can lead to information with value being lost among large volumes of administrative or operational data. **See recommendation 8**

A number of staff questioned how consistently current policy was followed and some strong views were voiced about its suitability – one calling it “outdated”, stating that in practice staff tended to manage information in their inboxes. The introduction of the ECM is expected to remove some barriers to information management and information sharing. However, its introduction and the end of the historic print to paper approach for records are unlikely to change ingrained behaviours by themselves.

In light of the degree and speed of change that the department is experiencing, the production of new guidance and policy should be recognised as a key goal and must be prioritised. In addition, UKEF should also give consideration to how policy and guidance will be promoted and the culture change that is needed to help ensure that they are followed. To support their adoption, UKEF must devise a communication plan to encourage greater understanding.

UKEF must also identify how senior staff and existing management structures can influence buy-in within the department. UKEF should in particular seek to engage its network of IAOs in light of their obligation to understand "what information is held, what is added, what is removed, how it is moved, who has access and why". UKEF Team briefings may also be a useful means of highlighting specific issues and addressing concerns. **See Recommendation 1**

### **Providing training**

UKEF has produced a 15-slide security presentation which it aims to use as part of the induction process for all staff, whether permanent, temporary or contracted. The training covers records management alongside other topics such as physical security and establishes key principles such as the impact of non-compliance with legislation and the need to store information in shared drives rather than outlook. This is a **good practice** approach.

### **3.4 Measuring Impact**

Goal: The organisation measures performance in practice and takes informed risk-based action as a result

#### **Measuring compliance with policy**

UKEF has not yet identified any performance measures for knowledge and information management and no routine monitoring or reporting of information and records management currently takes place. This places a significant limitation on UKEF's ability to understand how information and records are being managed in practice.

UKEF needs to define performance measures so that it can assess how well staff are adapting to new working practices and understand the likelihood and impact of related risks occurring. To make best use of current resources, UKEF should also consider establishing reporting criteria for the DRMO network. **See recommendation 7**

#### **Assessing progress against strategic goals**

Current records management policy establishes a requirement to provide an annual report on records management to the CEO. The assessment team understand that this has yet to happen in practice.

A number of organisations within the IMA programme have not fully implemented the information strategies they have defined. UKEF must ensure that the information strategy recommended by this report establishes time bound goals. The strategy should be accompanied with an implementation plan with measurable milestones and defined reporting requirements. **See recommendation 7**



## **4 Records Review and Transfer**

### **4.1 Oversight of records and Selection**

Goal: The organisation understands the value of its records and can consistently identify those with enduring historical value

#### **Oversight, control and use of records**

As highlighted above, UKEF has made efforts to impose structure on its technology environment and to understand the information that is contained within its shared drives. In overall terms, however, UKEF has a far greater level of oversight and control over its paper records. Current policy establishes a requirement for files to be sent to the department's records store in Cardiff for archiving. This appeared to be recognised by a majority of staff. The RMU maintains the ARCHI database, which documents all files stored in Cardiff. Separate lists are kept of files classified as "secret" that require additional access controls. UKEF undertook an exercise to recall all files which divisions no longer have operational need for and DRMOs are required to keep a list of all files out within divisions.

UKEF estimates that 30 paper files are recalled each month. Interviewees highlighted a lack of awareness of what was stored together with an inability to find records due to the naming conventions as possible factors in the volume of records that are recalled. The assessment team note that the RMU appears to have taken a proactive approach to challenging inconsistent practice in this area and closing the gap by re-titling files themselves. Poor titling may also impact on the ease of discovery of digital records. As UKEF develops new policy and guidance, it should ensure that the RMU is able to dictate the standards that the business should adhere to. **See Recommendation 6**

#### **Appraisal and Selection**

UKEF has agreed an OSP with The National Archives, which is published. **This is good practice** and The National Archives has a good level of

assurance that the department understands what records to select and that this is recognised as including sensitive cases. UKEF should ensure that its OSP is regularly reviewed as new functions are incorporated into the department and if the focus of the department's business changes. **See recommendation 8**

To support future appraisal, UKEF should publicise the OSP to help ensure that the potential historic value of records generated can be factored in at the start of projects. UKEF should ensure that full benefit is achieved from the project register in this regard and that there is routine contact with RMU at the start of projects. **See recommendation 8**

#### **4.2 Implementing Disposal Decisions**

Goal: The organisation understands the process for records disposal and consistently implements decisions in line with defined plans

##### **File closure**

UKEF maintains a record of disposal and destruction decisions and actions through its ARCHI database. UKEF reports a disposal figure of 3,562 paper files for the period 21 February 2013 to 21 February 2014. This indicates that processes are in place and working for paper records.

Currently, policy establishes file creation as the trigger for the commencement of disposal schedules for digital records, and the closure of files as the trigger for the commencement of disposal schedules for paper records. For records to be routinely disposed of according to value, organisations need to clearly define and act on disposal triggers. UKEF should ensure that a consistent approach to enable effective management of digital information and records going forward. **See recommendation 8**

##### **Sensitivity review and planning to transfer**

UKEF has recently agreed to select and transfer some of its most sensitive

cases to The National Archives. This has led to an increase in the number of files that are scheduled for transfer and will lead to an increased requirement for sensitivity review. UKEF is liaising with Ministry of Defence (MOD) regarding sensitivity review of these records and is aiming to transfer them early.

In general terms, UKEF transfers relatively low volumes of records to The National Archives. UKEF appears well placed to manage the 20 Year Rule shift and Records Transfer Report (RTR) returns have been completed on time to date and with zero legacy. To ensure that UKEF can maintain this level of performance, UKEF should ensure that the strategic vision for information is recognised to encompass the availability of records. UKEF may also benefit from defining a plan for the ongoing review and appraisal of records in all formats. **See recommendation 8**