The National Archives

Information Management Assessment

Welsh Government

Working with government
**to raise standards in
information management**

Contents

Statement of commitment

The following statement was provided by the Permanent Secretary of the Welsh Government. It is published on the Welsh Government intranet site:

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Statement of commitment by the Welsh Government

As Principal Accounting Officer, I am responsible for ensuring that appropriate arrangements are in place to capture, manage, protect, preserve and re-use information.

The Welsh Government took part in the Information Management Assessment (IMA) programme run by The National Archives (TNA) in March 2014. The National Archives' review of our systems and process provided me with an independent assessment of how well the Welsh Government is managing our information, and will help to mitigate any related risks.

Information is critical to every part of the Welsh Government business. I will use this report to ensure that we manage our information and systems throughout their lifecycle, and to achieve the right balance between making information more widely available to the public, whilst ensuring that adequate protection is in place.

Sir Derek Jones, Permanent Secretary, Welsh Government

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Key findings of the assessment

1   The value of information

Performance rating:	
Communicating and realising value	**Development area**
Managing information as an asset	**Development area**

- Welsh Government provides staff with a clear statement of the status of information as a corporate asset. However, there is currently no overall Information Strategy for Welsh Government to set goals for the management, protection and exploitation of information. This means there is no structured framework to provide joined-up direction on improving standards, tackling key information risks and realising the value of information in practice.

- Welsh Government has an established information asset management framework, which has a clear focus on information assurance. However, Welsh Government needs to review and revise linked and supporting policy and guidance, to ensure it is current and that definitions and governance requirements are clearly and consistently established. In line with Digital Continuity guidance published by The National Archives, Welsh Government should also seek to utilise its Information Asset Register (IAR) more effectively as a management tool. This should include using the IAR to leverage the logging and application of retention and disposal schedules for information assets held in existing and newly created line-of-business systems. These are not currently documented consistently, opening Welsh Government up to unnecessary risk.

2   Digital information and supporting technology

Performance rating:	
Supporting information through technology	**Development area**

Digital continuity and IT change	Development area

- The corporate electronic document and records management system (EDRMS), iShare, provides a supportive environment for information and records management. Welsh Government has also worked to restrict the use of alternative repositories in the form of current and legacy shared drives, and has stopped adding to the 19 terabytes of email that is stored in Enterprise Vault. This is a key first step, but information with value held in these locations remains less accessible than information stored in iShare and effectively sits outside Welsh Government's retention and disposal policy. Further implications include unnecessary ICT spend and unnecessary vulnerability under the Data Protection Act. Welsh Government must now provide a risk- and value-based decision on the ongoing retention of these repositories and the information they contain.

- No controls are currently applied to Outlook email accounts. This has the potential to undermine the effective application of information and records management policy. Welsh Government must address this to provide an impetus for the storage of corporate emails in iShare and deletion of emails that are ephemeral.

- Welsh Government has no Digital Continuity plan to help enable the ongoing completeness, availability and usability of information over time and through change. Producing a Digital Continuity plan aligned to an overall Information Strategy would help Welsh Government, in the short term, to ensure that its information assets are being managed in line with current business needs. Over the long term, it would help support the efficient selection and transfer of records.

3 Information risk, governance and oversight

Performance rating:	
Recognising information risk	Development area
Providing direction	Satisfactory
Providing guidance	Satisfactory

Measuring Impact	Satisfactory

- Welsh Government has no stand-alone information risk policy, but has a high-level Information Security Policy. Information risks are currently tracked within the Financial and Corporate Services Directorate divisional risk register. This represents a positive start, but Welsh Government must ensure that information risks, including those relating to information and records management, are consistently logged and recognised in line with its overall risk management framework. This is important because such risks have potential pan-government impact. To support this, Welsh Government should produce a definition of information and records management related risk and make its appetite explicit in this regard.

- New governance and reporting arrangements had just been introduced at the time of the Information Management Assessment (IMA) to bring information and records management staff within the same directorate. The assessment team recognises that these new arrangements offer clear opportunities for greater alignment and more consistent planning. This should be supported through standing membership on key information governance boards.

- The Departmental Knowledge and Information Manager (DKIM) role was introduced following a 2007 assessment by The National Archives. It is delivering clear benefit, although ongoing support for the role is needed, together with the balanced allocation of information and records management and information assurance-related responsibilities. Ultimately, these should be aligned to Information Strategy outcomes.

- To support the ongoing effectiveness of iShare, Welsh Government needs to provide clear guidance to help staff understand what information has value and needs to be kept. This is important to ensure that the right information can be captured in the first place and to ensure the successful application of the organisation's retention and disposal schedule. The organisation should seek qualitative and

quantitative performance measures to understand how effectively information and records management policy is being applied.

4   Records, review and transfer

Performance rating:	
Oversight of records and selection	**Good practice**
Implementing disposal decisions	**Satisfactory**

- Paper records are logged in iShare, and the assessment team recognises that Welsh Government has well-managed processes in place for its appraisal. In addition, the organisation has worked to maintain an up-to-date Official Selection Policy through to 2011.

- Although Welsh Government's macro appraisal policy needs to be bought up to date, the assessment team recognises that it is now beginning to supplement its existing approach with in-life appraisal. It is hoped that this will allow the early identification of records with potential historical value.

- Welsh Government must ensure that retention periods are applied correctly during the file creation process to ensure value is gained from the detailed retention and disposal schedule. Because retention periods do not begin until files are closed, Welsh Government also needs to ensure that file closure occurs routinely and in a timely fashion. There would be benefit in seeking routine assurance from the organisation's Information Asset Owners (IAOs) that these processes are occurring as needed.

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:

- Although a decision is needed about the long-term retention of the information held within email Vault and legacy shared drives, Welsh Government is no longer adding information to either of these repositories. This is a first step in controlling the risks involved.

- iShare, the Welsh Government EDRMS, provides a structured environment for the lifecycle management of digital and paper records. Retention schedules are applied at folder level and are being actioned according to defined triggers.

- Welsh Government has sought to gain further benefit from its EDRMS by standardising processes such as file creation and naming, and the allocation of privileges. This has been achieved via the 'Tasks' workflow process, which effectively acts as a filter for requests from the business.

- Welsh Government Internal Audit Services team subjected information retention, archiving and disposal processes to scrutiny shortly before the IMA. A series of recommendations were produced to improve standards. The Senior Information Risk Owner (SIRO) was a key customer of the report.

- The organisation has built use of the HADRIAN assurance tool into tenders at a very early stage. The organisation's ICT Pipeline factors in information Asset Owners and highlights the need to conduct privacy impact assessments (PIAs).

- The Welsh Government Information and Records Management policy has a clear review schedule and the mandate is established via high-level ownership from the Permanent Secretary. It is published on the organisation's website. Internally, standards are supported through compulsory e-learning.

- Welsh Government has begun to conduct in-life digital appraisal. This proactive good practice approach reflects the objective set out in the macro appraisal policy to identify historic value as early as possible in a records life.

Recommendations to address risk areas

Ref.	Summary recommendations
1	Develop and implement an **Information Strategy for Welsh Government** that sets goals for the protection, management and exploitation of information, and the technology that supports it. The strategy should place a clear emphasis on developing and maintaining the right culture and leadership needed to achieve this. This **priority recommendation** would be supported by: • Alignment with the overall strategy and vision for Welsh Government • Endorsement by the SIRO and at Management Group level and definition of reporting requirements • The adoption of a single lifecycle for information that can be referenced by IT, IA and KIM staff
2	Review and revise the Welsh Government Code of Practice on Access to (and Re-use of) Information This should include: • Reflecting the new responsibilities under the revised PSI Regulations which will come into force in 2015, particularly for the cultural sector • Proactive consideration of data that can be made available as open data
3	Review and revise guidance documentation covering the governance of information assets, ensuring that definitions and requirements are clearly established and conveyed across supporting and linked policy and guidance. This would be supported by: • Providing a clear line on how the term information asset should be applied to unstructured information and records, and how records and information asset management support and complement each other • Clarifying in policy and guidance IAO responsibilities in relation to disposal (see also recommendation 11)

4	Review the structure and use of the current IAR template to ensure it can be used as an effective management tool
	This would be supported by:
	• Consideration of fields highlighted within Digital Continuity Guidance published by The National Archives
	• Reflecting risk appetite and rankings within the IAR
	• Identifying IAOs for all information assets within existing line of business systems and using the IAR to log retention and disposal requirements
	• Ensuring that the ICT pipeline process surfaces new information assets and that retention and disposal and business requirements are logged as standard
5	Take a transparent, auditable risk- and value-based decision on the continued retention of Enterprise Vault, legacy shared drives and the information they contain
	This would be supported by:
	• Involving information and records management professionals, IAOs and departmental knowledge and information management (DKIM) network in assessing and appraising the value of information held
	• Assess, in alignment with wider Digital Continuity planning, how the availability of information with value held in these repositories can be increased and how the remainder will be disposed of
	• Updating the macro appraisal policy
6	Ensure proportionate controls are imposed on Microsoft Outlook accounts and other personal or unstructured repositories to encourage corporate storage of emails with value in the iShare Corporate File Plan.
	This would be supported by:
	• Promoting clear management rules to the business
	• Supporting the culture change that will be necessitated by new ways of working required when controls are imposed
	• Establishing and enforcing size limits on Outlook accounts
	• Imposing any automated deletion of emails at a point that will allow their business value to become apparent

7	Document a Digital Continuity plan in alignment with the overall Information Strategy and Vision for Welsh Government, to support the availability, completeness and usability of information assets over time and through change This would be supported by: • Joint input and joint planning from IA, RM and IT professionals
8	In line with the Welsh Government risk management framework, ensure a consistent approach to logging, tracking and managing information risks that have potential organisation-wide impacts including those relating to information and records management This would be supported by: • Providing a clear definition of information risk, with particular emphasis on risk related to information and records management. • Ensuring that the Welsh Governement SIRO information risk appetite statement is consistently referenced in key documentation (such as information and records and information security policies) • Ensuring that Welsh Government's appetite concerning information and records management related risk is explicit
9	Develop and embed new governance arrangements for information and records management This would be supported by: • Ensuring sufficient representation on information governance boards alongside IT and IA professionals to facilitate joint planning. • Reviewing the responsibilities and reporting requirements for the DKIM role to ensure on-going priority is given to information and records management requirements • Establishing a formal Records Management Support Officer (RMSO) network • Providing routine qualitative and quantitative reporting on information and records management performance to Operations Group
10	Ensure staff can be clear what information has value and needs to be captured in iShare in support of the Welsh Government's retention and disposal policy

	This would be supported by: • Requiring the routine promotion of clear and concise guidance in line with business process • Revising training to focus on the ongoing operation of the system
11	Prioritise the routine closure of files within iShare together with the correct application of retention and disposal schedules This may be supported by: • Leveraging support from the IAO network in line with their requirement to ensure information is "processed appropriately from creation through to disposal". • Establishing a formal requirement for IAOs or business owners to assure the correct application of retention and disposal schedules within the Corporate File Plan • Establishing a formal requirement for IAOs or business owners to assure the routine closure of iShare files in line with business cycles to support efficient operation of the EDRMS
12	Provide documented principles for sensitivity review to reduce the risk of records being mishandled or transferred open when they should be closed

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

Welsh Government has divided its intranet, Connect, into 11 main sections, one of which has been allocated to information. This clearly demonstrates its significance. The information section covers protecting as well as managing and exploiting information and knowledge, with documentation gathered in a single place rather than distributed separately under different functional headings.

The first page in the Information section within Connect provides the following headline statement for staff on the value of information:

> "The knowledge and information we hold is one of our most important assets. It ensures that the decisions we make and the advice we give is based on a robust bank of evidence. Managing and protecting this information – particularly if it is sensitive or personal – is an important part of our role as civil servants."

Policy and guidance reviewed by the assessment team emphasise the need to adhere to best practice principles for records management, to store information correctly and to share it appropriately and effectively.   Staff interviewed who worked with sensitive information recognised both the need to safeguard its security and to ensure it was available to those needed to access it. The majority were clear that business activities should be documented and that audit trails should be preserved and retrievable. As one interviewee commented, "any civil servant not keeping proper audit trails needs to take a long hard look at themselves".

At the time of the IMA, Welsh Government was planning to hold a workshop aimed at improving standards of records management, with a particular emphasis on email use and storage. This was scheduled to address recognised risks in relation to email storage and retention, and encourage good practice in records management. The level of understanding of the value of information found among interviewees suggests that Welsh Government has a good basis to build on. In the long term, the value of information must continue to be promoted, and staff must be supported to understand what actions are required of them as a result. **See recommendation 1**

Setting goals and championing information and its management
Welsh Government developed a 2012–15 Knowledge and Information Management (KIM) strategy, which established the following good-practice vision:

> *The Welsh Government captures, stores, exploits and shares information and knowledge effectively and safely throughout its lifecycle.*

The strategy was given a review date of December 2013. However, this date has not been met and the strategy was not recognised as a live document by interviewees. An accompanying 14-page communications plan includes a detailed timeline through to the strategy's proposed review date, establishing supporting activities and issues that could affect their communication, target audiences and delivery mechanisms. This has remained in draft since its production.

The lack of a current strategy and vision means that Welsh Government is not establishing what 'good' should look like for its information, or providing direction on when and how this will be achieved. The fact that the email and records management event has been scheduled to identify goals, recommendations and a way forward and to engage stakeholders from across the organisation demonstrates this gap. Welsh Government should be commended for taking action and organising this event. However, the lack of

an information strategy increases the risk that Welsh Government will become crisis-focused, and address issues in isolation rather than as a component of a strategic plan.

To gain most benefit, the Welsh Government information strategy should be positioned as an umbrella document that can provide direction for the management, protection and exploitation of information and for the technology that supports it. Alignment with Welsh Government's overall business plan and vision will be crucial in underlining the strategy's importance. Useful models within the IMA programme include the Ministry of Defence, whose Information Vision within its published strategy is directly aligned with the overall Defence Vision.

Developing and maintaining the right culture was intended as a core component of the 2012–15 KIM strategy, and should be a core strand of the new strategy. Senior support will be critical, particularly in ensuring follow-through and successful implementation. Within Welsh Government, endorsement at Management Group and Senior Information Risk Owner (SIRO) level would provide the necessary crosscutting impetus. **See recommendation 1**

Enabling public access to information and supporting transparency
Senior staff interviewed emphasised Welsh Government's commitment to meeting its obligations under the Freedom of Information (FOI) Act and to the principles of transparent and open government.

Welsh Government has been subject to a period of monitoring by the Information Commissioner's Office in relation to its performance under the FOI Act. Since then it has improved from a low of 79% of non-routine information requests answered within permitted time limits. Interviewees indicated that this improvement had been achieved through a combination of awareness campaigns and the introduction of workflows to standardise and simplify procedures. Ministers are routinely briefed on all FOI queries received

and the resulting senior ownership of FOI performance has been helpful in prioritising rapid resolution of queries.

The assessment team notes that Welsh Government has made a public commitment to "publish Cabinet agendas, minutes and papers (not subject to the exemptions from publication) six weeks from the date of the respective meeting". Welsh Government's investment in transparency is evident from initiatives such as the Transparency and Mortality taskforce, whose aim is to make it easier for people to find and understand a wide range of information about local health services. Interviewees also highlighted the mylocalschool.wales.gov.uk portal launched to give parents the "power to see how their local school is performing". They emphasised that the goal of this initiative was to provide open access to information rather than to deliver "good news stories".

At the time of assessment, however, underlying documentation was found to be out of date. This includes the Welsh Government's publication scheme, which contains over 30,000 items produced by the Welsh Government and Welsh Office. The ICO requires organisations to maintain their publication schemes as part of their commitment to publishing information proactively. The assessment team understands that this document is now being updated. The assessment team also notes that the Code of Practice on Access to Information, which sets out Welsh Government's guiding approach to open government, has not been updated since publication in 2007. This document still has Welsh Assembly Government branding and does not refer to concepts such as transparency and open data. This should be reviewed. **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 characterising information assets

Welsh Government provides guidance on the management of information assets via its 2011 Information Asset Handbook. The Information Asset Handbook characterises an information asset as "a body of information (electronic or otherwise), defined and managed as a single unit, so that it can be understood, shared, protected and exploited effectively." This is an open and inclusive definition, which provides a suitable basis for identifying, categorising and cataloguing both structured and unstructured information assets.

However, although the handbook is detailed and comprehensive, it still bears Welsh Assembly Government branding and a September 2012 review date. The assessment team notes that Cabinet Office guidance, which the handbook references, has also been updated since it was published, notably in October 2013 following the assimilation of IS6 into the Security Policy Framework (SPF). [1] The handbook also does not reference the December 2013 Welsh Government SIRO Information Risk Appetite Statement. This establishes the following four classes of information asset:

- Internal corporate information
- Internal corporate information available to overseas staff
- Websites or third parties processing RESTRICTED or sensitive personal information about staff/citizens
- Information/marketing websites.

These categories are not reflected in the extract from the Information Asset Register (IAR) seen by the assessment team, and neither these nor the appetite statement itself were referenced in any of the other documentation supplied for review.

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[1] IAO guidance:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/255914/Guidance_on_the_IAO_Role.pdf

The Information Asset Handbook emphasises the requirement for IAOs to approve disposal mechanisms for paper or electronic records from their information assets. However, it provides minimal context on how disposal should be carried out in practice other than stating that information must be "processed appropriately from creation through to disposal". The Handbook links to the Information and Records Management policy, but this provides no further guidance on how IAOs should discharge their responsibilities in relation to records disposal. It also does not provide or link to a definition of an information asset, or detail how the term should be interpreted or applied in relation to information and records. Similarly, the Welsh Government Information Security policy is intended to protect its information assets. However, this provides a statement on the formats that information can take or be conveyed in, rather than providing or linking to an explanation of what information assets are and how they need to be managed.

Welsh Government must review and update its guidance and policy on information assets. To enable joined-up and effective governance, it must also ensure that requirements are clearly defined and represented consistently in overlapping documentation. Doing this offers an opportunity to establish how the term information asset should be applied in practice to unstructured information and records, and how the processes of records and information asset management support and complement each other. This report in particular recommends that Welsh Government clarifies its line on the lifecycle management of information assets, and that it makes IAO responsibilities and in relation to creation and disposal explicit. **See recommendation 3, 4 and 11**

Allocating owners
The IAO pages on Connect are within the Information section. IAOs are required to report to the SIRO on a quarterly basis. IAOs interviewed by the assessment team were clear about their role, including the need to influence information management culture and raise awareness within their areas of responsibility. However, the assessment team notes that Welsh Government's

one-page job description for the mandatory role of IAO dates from 2008. The Cabinet Office definition of supporting roles contained in an annex to the Information Asset Handbook is also now out of date. This should be included in the review of information asset management documentation recommended by this report. **See recommendation 3**

Information Asset Registers

The Welsh Government IAR is intended to provide a list of information assets held. The extract reviewed by the assessment team includes fields to capture a description of information asset, IAO and risk score and a column to identify personal data. Aside from a few instances where information assets marked as protect or restricted have a risk score of zero, these columns appear to be completed to a good standard and to contain useful context.

However, the amount of context recorded elsewhere varies, and a number of other columns appear largely blank. Digital Continuity guidance published by The National Archives advocates the use of IARs to document the links between an organisation's information assets and its business requirements. This can help organisations define how information assets need to be managed in order to deliver business outcomes. It can also help organisations to understand the impact that changes to information assets may have on business requirements and vice versa. Recommended fields cover how the asset needs to be used, its value, purpose and status together with retention requirements. Of these considerations, only "purpose" is explicitly factored in to the current Welsh Government IAR, and this field has not been completed consistently. Welsh Government should draw on Digital Continuity guidance and review its IAR template to ensure it is able to gain full value from it as a management tool. Including retention requirements on the IAR is particularly important in supporting IAOs to meet their obligation to oversee the lifecycle management of their information assets, as highlighted above. **See recommendation 3, 4 and 11**

Supporting information through technology

2.1 The technology environment

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

Corporate storage of information

iShare is defined in the Welsh Government information and records management policy as the main corporate repository for information created and received "that needs to be retained for business or historical purposes". The file plan is functional at the top level and the system supports the application of retention criteria at folder level. The assessment team recognises that Welsh Government has made efforts to control and shape how information and records are stored and managed within the system. The team gained a good level of assurance that the EDRMS is well-run and that it is currently providing a supportive and enabling environment for records management, in line with key requirements set out in the Lord Chancellor's Code of Practice on the management of records.[2]

iShare records, however, form only a small percentage of the total volume on Welsh Government's servers. The assessment team notes that a significant volume of information is held in line of business systems, to which retention is not necessarily applied and over which records management control is not necessarily exercised.

While information held outside the EDRMS may not ultimately be selected for permanent preservation, it has a value to the business and a lifecycle that needs to be managed. It should also be recognised that all information generated by Welsh Government is a public record. Welsh Government has an equal obligation to ensure the safekeeping and timely disposal of the information that is contained within these systems as those that are contained

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[2] http://www.justice.gov.uk/downloads/information-access-rights/foi/foi-section-46-code-of-practice.pdf

within iShare. A lack of oversight and control of these systems raises the risk that information with ongoing value may be disposed of too early, and in an uncontrolled manner. At the same time, there is also a risk that information outside iShare may be retained for longer than needed. This would result in unnecessary ICT costs, unnecessary vulnerability in security terms and under the Data Protection Act.

Welsh Government must ensure that a supportive governance framework is provided for the information assets that exist within line of business systems. IAOs need to be identified and retention schedules need to be documented (for example within the IAR) and actioned. IAO responsibilities in terms of lifecycle management need to be defined formally and should explicitly cover these considerations. **See recommendation 4**

According to statistics provided to The National Archives, Welsh Government also holds some 16 terabytes of data held in legacy and current shared drives and 19 terabytes of data in Enterprise Vault. The assessment team note that Enterprise Vault is no longer active and that emails are no longer automatically archived. Welsh Government has also taken steps to exercise control over its shared drives to prevent or limit their use in preference to iShare. Information and records management staff stated that an additional drive, the R-Drive, was still provided for linked spreadsheets that could not be supported by iShare. Policy indicates that restrictions are imposed to prevent use of the R-Drive beyond temporary storage of relevant context. This is also to be commended, although the assertion was not tested during the assessment.

The legacy P-Drive was used until the end of Welsh Government's previous print-to-paper policy for records and the introduction of iShare. This is now locked in read-only form. Although much of the information contained within the P-Drive will exist in hard copy due to the previous print-to-paper policy, a number of staff interviewed expressed doubt over the consistency with which this policy had been applied. Much of value that is not captured elsewhere may therefore remain within the shared drives.

Locking down these locations is **good practice.** The assessment team also recognises that the closure of the email Vault was a driver for the email and records management event. However, at the time of the IMA, Welsh Government had not decided how long these repositories and the information within them needs to be retained. Welsh Government must now address this. **See Recommendation 5**

Finding, accessing and protecting information

Interviewees highlighted the fact that iShare is a single EDRMS for the whole of government. As such, staff recognised it as offering enormous benefits in terms of collaborative working and information sharing. The utility of e-clipping was highlighted, which allows staff to view and organise information across different files, together with the application of "caveats" to control access. Staff highlighted the ease of access to and availability of information within iShare as a core benefit of the system when compared to the previous system of shared drives.

Information held outside iShare is less accessible but, as noted above, may still have considerable value. The previous policy of auto archiving emails in Enterprise Vault was well-established. The very existence of this policy may have encouraged staff to assume that the practice of auto-archiving emails was sanctioned. This may mean that staff have routinely allowed information with value to move into their personal email archive. Interviewees stated that they routinely searched Vault for information, and the assessment team heard anecdotal evidence that previous attempts to move to lower-tier storage, which would have made information harder to access, were met with resistance from the business.

Interviews with staff suggested that some teams had lost sight of the information contained within shared drives. In the case of one team that held high-value records where short-notice access was a key priority, a decision had been taken to move information out of the shared drives and into the EDRMS.

The continued retention of information within Enterprise Vault, shared drives and other repositories such as the personal Home Area of iShare raises risks to the availability and completeness of information. This has a potential effect on efficient and effective service delivery and on Welsh Government's ability to meet its legal obligations with reputational and financial impact. Welsh Government must take a risk- and value-based decision on the retention of these repositories. As a component of this, it should assess how to increase the availability of information with value held within these repositories and how the remainder will be disposed of. The IAO and DKIM networks and the organisation's information assurance and information and records management professionals should be key stakeholders in this process. **See recommendation 5**

Current email management

The organisation's 90-day deletion policy for received and sent email has not been implemented. Emails that might previously have been allowed to pass into the email archive may now remain in place within mailboxes. This raises comparable risks to storage in Enterprise Vault (in terms of completeness and availability), without the potential benefit of reduced costs and overheads achieved by maintaining large volumes of email in compressed form.

Welsh Government recognises that it needs to impose control criteria in relation to Outlook. In identifying and implementing a solution, it should give particular attention to establishing workable management rules (who should capture what, when and how) that can be supported through guidance and training. Guidance published by The National Archives recommends that this should be supplemented by imposing a proportionate size limit on users' inboxes and/or automatic deletion.[3] If a decision is taken to implement automated deletion for emails, the chosen period must be sufficient to allow the business value of information to become apparent. Welsh Government must be wary of imposing an idealistic, "model" policy that is not practical and cannot or will not be implemented.

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

Doing this will, however, raise a new scenario. Previously, emails not captured within iShare, though less available, would only be truly lost if they were deleted by staff or by Welsh Government when staff left. An automated process would see emails not captured in iShare deleted on a continual and rolling basis. At the same time, staff may simply adopt "workarounds" such as resending emails to themselves or dumping volumes within the file plan or Home Areas in iShare or other alternative repositories. Both factors underline the importance of encouraging and supporting culture change in information and records management if desired standards are to be achieved. **See Recommendation 1 and 6**

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

Digital continuity planning and technology change

Digital continuity is an important consideration for any public sector organisation, to not only guard against the impact of digital obsolescence, but to also ensure the ongoing usability of its information. An effective approach reduces the provision of unnecessary technical capacity and ensures information assets are supported to meet current and future business needs.

Welsh Government has no Digital Continuity plan for the information it produces, owns and oversees. The assessment team saw limited evidence of joining-up between ICT and information and records management staff. For example, although the draft 2012–15 KIM strategy was explicitly linked to the People and KIM strategies, it is not referenced in the ICT strategy, which is established over a different period (2012–16). This suggests that although shared themes are evident in both (such as tackling duplication) the two documents were not drawn up together and that stated links between them were aspirational rather than actual.

Welsh Government must address this and ensure active and joint planning for Digital Continuity by ICT and information and records management staff. This should be facilitated by embedding Digital Continuity principles of completeness, availability and usability in the Welsh Government Information Strategy recommended by this report. **See recommendation 7**

Supporting information through change

Technology change projects are logged via the ICT Project Approval (iPAF) registration form, which is part of the ICT Pipeline. This has been established to support all ICT-related projects across Welsh Government. The sample iPAF registration form reviewed by the assessment team allows those registering a new ICT project to identify high-level business requirements, indicative cost and dependencies. The form references the need to sign off a business impact level analysis of data with the relevant IAO and to conduct a privacy impact assessment (PIA). **This is good practice.**

The information and records management policy sets out a requirement that information and records management staff should be formally consulted as a component of the ICT procurement or change process. However, the assessment team gained limited assurance that this is happening in practice. In addition, although the iPAF form includes a field titled "information management", it was left blank in the completed example viewed by the team and the team was not clear how it is intended to be used.

The ICT Pipeline provides an opportunity for Welsh Government to identify Digital Continuity and retention and disposal requirements at the outset, whether through iPAF registration or by other means. Welsh Government must do this for all new projects and ensure these requirements are logged on the IAR or in an alternative linked location. This context must be accessible to information and records management staff and other relevant stakeholders to ensure Digital Continuity and lifecycle management outcomes can be met. **See recommendation 4**

3 Information risk, governance and oversight

3.1 Recognising information risks

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

Documenting and defining information risks

Welsh Government maintains a main strategic risk register and individual risk registers at directorate level. Additional risk registers may be created at divisional or branch level.

The assessment team notes that a number of potential risks relating to ICT systems resilience and information and records management are recognised on the Financial and Corporate Services (FCS) divisional risk register. Responsibility for information systems and information policy sits within this directorate, and as such it is appropriate to capture the above risks at this level. Senior interviewees within the directorate were clear that relevant risks could be escalated if required.

Welsh Government has made a good start in terms of recognising these risks within its risk management framework, which is established in the 2006 guide 'Risk Essentials'. However, although this document establishes information quality and information management as examples of risk areas that should be considered when establishing risk registers, the assessment team gained limited assurance that this is happening in practice outside FCS. While senior staff interviewed outside FCS highlighted the "epic results" in terms of reputational damage and financial penalties that could be incurred if Welsh Government got things wrong, none could confirm whether information and records management-related risks featured on their own risk registers.

Welsh Government must ensure that risks relating to information and records management have a consistent profile across the whole organisation. This is important because culture is a key cause of information risk, and responsibility

for interpreting and applying policy and for using systems correctly lies with the business. A more consistent approach to logging and managing information and records management-related risks may be leveraged through existing risk management and information asset management frameworks. Some IMA members have also chosen to implement a separate SIRO risk register to document information risks with potential organisation-wide impacts to ensure they have the right profile.

See recommendations 8 and 11

Implementing an Information risk management approach

The assessment team was pleased to note at the time of the IMA that the Welsh Government Internal Audit Services team had recently carried out an audit covering information retention, archiving and disposal. The assessment team understands that the resulting report and recommendations will be directed to the SIRO. **This is good practice.**

Welsh Government places a clear priority on information security and the assessment team was pleased to note a number of examples where business process had been put in place to manage related risks. Welsh Government uses the HADRIAN assessment tool, developed by the Home Office, to help mitigate risks associated with the use of sensitive information or commercial by suppliers and contractors. Interviewees indicated that this is built in to tenders at a very early stage. Departmental Knowledge and Information Managers (DKIMs) reportedly also have a role in monitoring and following up with companies in question. **This is good practice.**

Welsh Government has not produced a stand-alone information risk policy to accompany its high-level Information Security Policy. The latter establishes a commitment to maintaining certification to ISO27001 and the objective of preventing and minimising the impact of security incidents. The policy underlines the need for participation and support from all staff and highlights the need to adhere to access to information and records management policies as well as the Welsh Government's security policy. Highlighting these policies is a positive step and underlines how adherence helps reduce risk**.**

The Welsh Government information risk appetite statement references Office of the Government Senior Information Risk Owner (OGSIRO) guidance, but is intended to reflect its own working practice. Welsh Government should support this by ensuring it provides a clear definition within policy of information risk, including in relation to information and records management. It should ensure that it clearly establishes its appetite for the latter class of risk and that the risk management approach is clearly established. This would support Welsh Governement in the decisions it needs to take regarding Enterprise Vault, email management and the shared drives.

As noted above, the Informaiton Security Policy does not provide a clear definition of an information asset. It also does not establish the role of information asset management or governance functions such as the Knowledge and Information Management and Security (KIMS) group in monitoring and managing risk. Welsh Government should ensure that these are established in policy form and that clear links are made to the SIRO Information Risk Appetite Statement. **See recommendation 8**

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

Supporting the business
As a component of the recent 20% budget cuts conducted within Financial and Corporate Services, a decision was taken to disband the Knowledge Management Unit. At the same time, the Information & Records Management and Library and Archives Services teams were brought together under Knowledge and Analytical Services (KAS).

Historically, Library and Archives has had responsibility for establishing retention policy. The Information & Records Management team previously sat within the Human Resources directorate as part of Expert Services and

People. This team has had responsibility for overseeing the application of this policy within iShare, but not for applying it outside the EDRMS. Both teams now report to the Chief Social Research Officer. This is a positive development with the potential to support closer alignment between the two teams.

The assessment team notes that the Library and Archives Services work plan for 2013–14 was drawn up to reflect KAS priorities and referenced key themes that had been highlighted within the 2012–15 KIM Strategy. However, staff from KAS were unaware whether the Information & Records Management team had drawn up a comparable business plan. One senior interviewee stated that any business plan produced by the Information and Records Management team would reflect their own previous directorate's priorities rather than those of KAS. Now that the two teams are co-located, Welsh Government must ensure closer alignment and coordination between them.

Welsh Government should also consider how information and records management can be leveraged through key governance boards, now and following the introduction of a new Information Strategy. This is particularly important in ensuring that information and records management governance is applied to all information holdings, not just to iShare.

Support roles and networks
Welsh Government has defined a series of roles to support information, records and knowledge management within the business. Records Management Support Officers (RMSOs) act as a filter between the business and the key processes of file and file part creation, renaming, allocation of disposal criteria and setting up caveats to protect sensitive information from unauthorised access. These actions are directed to and completed remotely by Disposal Officers via the "Tasks" Workflow process. This **good practice approach** has the potential to standardise the way in which these activities are carried out.

The assessment team found a good level of recognition of the RMSO role and responsibilities. A number of interviewees indicated that RMSOs had provided challenge and push-back in response to their requests. In one case, an interviewee stated that this had caused problems; an RMSO had refused to set up a caveat for contact details that the team wished to protect, on the basis that access to them did not need to be restricted. The interviewee stated that the team had then hidden the phone numbers within the file plan, leaving them potentially vulnerable. Broadly, however, interviewees believed that that challenge from RMSOs had been helpful – for example, where new files were not needed and where file names were not helpful.

Role-specific training is available for RMSOs and those interviewed appeared knowledgeable. However, the assessment team did not see evidence that there was an established RMSO network or community in place. Welsh Government should consider what could be done in this regard to provide support, share good practice and help ensure that correct criteria are consistently applied. **See recommendation 9**

Welsh Government established a network of Departmental Knowledge and Information Managers (DKIMs) following a previous assessment in 2007. One DKIM is allocated to each Welsh Government directorate. One senior member of staff and head of team described their DKIM as performing a critical friend role, and acting as a first point of contact for queries. Those DKIMs interviewed were knowledgeable and appeared to be proactively building and maintaining networks within their DG area as set out in induction guidance, with IAOs engaged as key stakeholders. The assessment team also heard anecdotal evidence that DKIMs were instrumental in the identification of IAOs where none had previously been appointed. DKIMs have a role in the records disposal and FOI processes and support IAOs in relation to third-party assurance and the HADRIAN process.

According to the DKIM induction guide (dated February 2013), the primary function of the role is to support KIM and Information Assurance strategies. This is to be achieved through "encouraging, developing and maintaining high

levels of compliance with relevant legislation and promoting good practice". Responsibilities are allocated against teams within Expert Services. A subset including compliance with copyright law and promoting available support are allocated against Library and Archives Services.

DKIMs have an annual work plan, which the assessment team did not review. Interviewees stated that DKIM priorities had changed, and were currently focused heavily on security considerations. DKIMs undoubtedly have much to offer in this regard, but security is only one element of the information agenda and DKIMs have further benefit to add in terms of the wider management and exploitation of information assets. This includes enabling oversight of the information assets, supporting consideration of Digital Continuity requirements and facilitating lifecycle management. Following the recent restructuring within Corporate Services, the responsibilities of the role should be clarified. The creation of an Information Strategy for Welsh Government offers an opportunity to reaffirm the importance of the DKIM role, review priorities and objectives and align them towards strategy outcomes. **See recommendations 1 and 9**

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 Welsh Government Information and Records Management policy was published in September 2013 and is next due to be reviewed in September 2015. The policy is owned by the Permanent Secretary and is published on the Welsh Government website. **This is good practice.**

The publication of the policy was defined as a core action within the Library & Archives Services business plan, which was clearly aligned to KAS objectives of secure organisational operation and clear governance and assurance. The role of policy in supporting these outcomes is, however, undermined by the

fact that a number of actions mandated by the policy have not been carried out or enforced, as highlighted in this report. Welsh Government must ensure that the policy it produces is promoted and supported throughout the organisation. **See recommendation 10**

The information and records management policy establishes the following eight-stage information lifecycle, against which high-level policy statements are provided: Create; Assure; Use; Store; Access; Share; Publish; and Dispose. This lifecycle is not linear and differs from the five-stage lifecycle originally incorporated within the 2012–15 KIM strategy. The lifecycle was also not represented in other guidance reviewed by the team. Welsh Government should adopt a common information lifecycle that those functions responsible for the assurance, management and security of information can reference together. **See recommendation 1**

Providing guidance and training

The assessment team understands that Welsh Government invested considerable effort in establishing how to use iShare at the time of its introduction, including floorwalkers and the provision of a central resource for training. E-learning is currently provided and is compulsory for new starters. **This is good practice.** The assessment team recognises that a substantial volume of guidance is available on Connect, although some appeared to find the volume confusing and most stated that they spoke directly to their RMSO or DKIM for advice on filing.

In comparison to the situation within some IMA programme member organisations, staff showed a general recognition of the need to use the corporate EDRMS. A number of common themes were nonetheless referenced by interviewees that may raise information and records management related risks for the department in the long term. Key among these were a perceived lack of time to file and an accompanying lack of clarity over what information had value and should be captured. Both of these factors could combine to undermine the completeness and availability of information in the long term.

In the future, to derive full benefit from the EDRMS, Welsh Government needs to ensure that records are captured according to value, are stored in the right location and manner within the system and are disposed of when no longer needed. With iShare embedded on a business-as-usual basis, Welsh Government should focus its guidance and training on getting the best from the system. It should explicitly address the perceived barriers to information and records management. In particular, with support and input from IAOs, DKIMs and RMSOs, Welsh Government should ensure that staff are clear on what information has value, and where and when it needs to be captured. Senior staff should lead by example and help ensure that information and records management needs to be recognised as a requirement of the day job and not an addition or impediment to it. **See recommendation 10**

3.4 Measuring impact

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

Measuring compliance with policy

Welsh Government can generate statistics on the size of individual repositories including Outlook, Vault, shared and personal drives. The Information and Records Management Group also periodically provide soundings and statistics to Operations Group showing the number of active, caveated and destroyed files and documents within iShare. The Information and Records Management team was also able to provide a detailed breakdown for iShare covering the period 31 May 2013–1 June 2014. These showed the total number of files created and closed for the year, and the total number of documents created by format.

As new team structures bed in, Welsh Government needs to ensure it makes use of these statistics and views them in context of wider information management and storage. Quantitative as well as qualitative assessments of

progress to manage risks and deliver benefit will be important as Welsh Government seeks to drive better email and records management. **See recommendation 9**

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

The Departmental Records Officer (DRO) role is allocated to the Head of Library & Archive Services. The DRO and the Library & Archive Services team oversee the appraisal and preparation of paper files for transfer to The National Archives. They have also authored the detailed Information and Records Management policy and Retention and Disposal schedule. It is the assessment team's view that the recent restructuring of Corporate Services places the DRO and by extension Welsh Government in a better position to ensure that policy and its application are linked.

The assessment team gained a reasonable level of assurance that iShare is currently providing a good environment for records management in general and for tracking paper records that are logged in the system.

Welsh Government employs a macro approach to appraisal, considering broad subject areas and using key word searches based around themes or newsworthy topics. This process focuses on the importance of the business function that creates the record. In practice, it represents a second review following a 2005 review of all paper records held. This was based on file title, to address a backlog of registered files that had accrued. The file-level approach was implemented because series-level classification did not provide a reliable means of selecting records.

Welsh Government produced a macro appraisal policy in 2009. This provides a clear statement on guiding principles:

"The records selected for permanent preservation should provide information about, and evidence of, what the Welsh Government has done and why, what it and its staff and management (Permanent Secretary, Head of Departments & Boards) have achieved, and of its impact locally and in the wider world. The selection process should also facilitate the survival of records which contain unique information incidental to their main purpose or function but which, nevertheless, might have research value."

In terms of ongoing process, paper appraisal appears well-managed. The assessment team was pleased to note that Welsh Government has begun to conduct in-life digital appraisal. This proactive **good practice** approach reflects the objective set out in the macro appraisal policy to identify historic value as early as possible in a record's life. However, the macro appraisal policy reviewed by the assessment team focuses on paper and appears to have missed its 2011 review date. This must be brought up to date and expanded to provide a clear statement on digital records held within and outside iShare. **See recommendation 12**

4.2 Implementing disposal decisions

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

Retention and Disposal scheduling

Welsh Government introduced its Retention and Disposal schedule in 2009. It includes an authorisation from the previous Permanent Secretary dated 25 January 2010 as required by the Government of Wales Act, 2006. In light of the document's importance, it may be appropriate to include a statement from the incumbent Permanent Secretary to underline the document's ongoing role.

The retention and disposal schedule supersedes Welsh Government's Standard Information Classification and Retention Scheme. Its structure and use is to be assessed in detail not less than every five years. The document is intended to be reviewed routinely on a biannual basis and was last amended in December 2013. Welsh Government intends to make the schedule available as a reference tool for members of the public to search for information under different legislative regimes. However, the version currently available on the website version dates from May 2012.

The retention and disposal schedule is intended to cover paper and digital information and aims to provide a "consistent approach to the way the Welsh Government handles its records, and provide a clear set of guidelines to all staff". It is intended as a living document that will need "amending and updating as and when retention details change, new information is kept". A comparison of the May 2012 and December 2013 documents indicates that no additions or changes have been made to the schedules themselves within that 18-month period.

From the point of view of staff, the retention and disposal schedule largely operates behind the scenes; retention periods are allocated as a component of the file creation process by RMSOs. This may have the effect of distancing records creators from the consideration of how long records need to be retained for – interviewees were not necessarily aware that schedules were being applied and that files would eventually be closed. For this process to be effective, Welsh Government needs to be sure, firstly, that the right retention periods are being applied to files in iShare and allocated to line-of-business systems. Secondly, in terms of iShare, it needs to be sure that the right information is being stored in the right place. Doing this is important, for example, to ensure that information such as administrative data can be disposed of quickly and routinely and is not retained for longer than needed because it is stored with information or greater value. At the same time, this helps ensure that information with greater value is not disposed of prematurely. The recent Welsh Government internal audit of information

retention, archiving and disposal tested this aspect and provided a level of assurance that the process is operating effectively.

Welsh Government needs to continue to monitor the application of retention schedules to the file plan. This would be supported by establishing a formal requirement for IAOs to confirm that disposal schedules are correctly allocated within their area of the iShare file plan. Adding this component to their assurance responsibilities would support them in practice to meet the requirement set out in IAO guidance to ensure information is "processed appropriately from creation through to disposal". **See recommendation 11**

The application of triggers for disposal

A footnote within the retention and disposal schedule states that files will remain open in iShare for five years after creation, unless closed earlier. This time period is not referenced in the information and records management or retention and disposal policy. The former indicates that files should be closed "when a project is formally disbanded or when a piece of work has been completed".

The retention and disposal schedule provides a mixture of flat timescales that should be applied from the point when relevant work ends or after the file is closed at five years. It also provides other timescales defined by a particular event such as "three years after creation" or "6 Months from the date of the last correspondence on the matter". These are taken to represent end points for pieces of work in practice, at which point files must be closed and the retention period should begin.

Statistics supplied by the Information and Records Management team for the period 1 June 2013-31 May 2014 show that a total of 7,952 virtual and mixed media files were closed in the course of the year and a total of 12 were destroyed. To support the achievement of information and records management and the efficient operation of the EDRMS in the long term, Welsh Government must ensure that virtual files do not remain open for five years by default. Doing this would mean that information and records were

potentially being retained for years longer than they need to be. A lack of clarity was evident even among staff who were aware of the file closure process. One such interviewee noted that it was not ideal that when they transferred historic information into iShare from another repository it would then sit in an open file for five more years before the retention period would begin. In practice, such files should be closed as soon as established.

The assessment team recognises the decision to move from an annual to a monthly circulation of disposal lists as a positive step. These represent the eventual output from the process. In addition to the ongoing emphasis that should be put on the creation of records, Welsh Government must prioritise the routine closure of files in line with business cycles. As a component of this, procedures relating to closure and the commencement of the retention period should be given additional emphasis within the information and records management and retention and disposal policies. IAOs should provide assurance on file closure. **See recommendation 11**

Sensitivity review and planning to transfer

Welsh government currently has two staff allocated for file clearance and sensitivity review. Staff have received training to carry out this role, but the assessment team understands that principles for sensitivity review have not been documented. Welsh Government should ensure that this is done to reduce the risk in the long term of records being mishandled and transferred open when they should be closed.

Welsh Government is subject to the 20-year rule and, along with English government departments, is within the 10-year transitional period that concludes in 2022. Welsh Place of Deposit records are, however, exempted from the initial commencement and will become subject to the 20-year rule at a later date. Selection is carried out against the 2011 Official Selection Policy. This covers up to 2011, and Welsh Government has demonstrated a commitment to keeping this up to date.

Welsh Government first introduced digital systems in 1999 and its print-to-paper policy did not end until 2008. Digital records will therefore not be due for transfer for some considerable time. Nevertheless, Welsh Government is involved in both the digital sensitivity review and digital transfer groups. Interviewees also indicated that Digital Records Infrastructure (DRI) testing has been conducted within iShare.[4] **This is good practice.**

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[4] The DRI is The National Archives' digital archive, which manages and actively preserves the records of the UK government.