

## **Information Governance Policy**

**Policy Statement:** Good information governance supports the Commissioner in her role as set out in the Wellbeing of Future Generations (Wales) Act, to work in line with the principles of openness and transparency and to protect privacy appropriately. It provides a robust framework within which information is collected, held, used and shared.

The Commissioner recognises the significance and value of information as a corporate asset and resource and the risks of poor information governance. The Commissioner is committed to ensuring that information is well managed according to best practice standards and in compliance with the Commissioner's legal duties

The Commissioner expects that all staff and associates continue to work in a manner that ensures openness and transparency while protecting the personal information of individuals.

In May 2018 the law on the handling of personal information changes; all our information related policies and procedures have been reviewed to ensure they comply with the law and continue to support our working practices.

### **Relevant Legislation**

The Freedom of Information Act (FOIA), the Environmental Information Regulations (EIR), the Data Protection Act (DPA), General Data Protection Regulation (GDPR)

### **Responsibilities**

The Commissioner (as corporation sole) delegates authority for IG compliance to her senior staff team

- Director of Finance and Corporate Governance
- Head of Human Resources
- Data Protection Officer
- Finance and Corporate Governance Officer
- Office Manager
- All staff and associates are required to comply with this policy.

## **Related Policies**

IT Security & Acceptable Use Policy

Information Security Policy

Freedom of Information (FOI) & Environmental Regulations Policy

Data Protection Policy

Access to Information Guidance

Data Breach Policy

## **Expectations**

The Commissioner expects that all staff and associates act in a manner that supports these commitments and comply fully with these requirements.

Any failure by staff to comply with information governance policies and procedures may result in a formal investigation and/or disciplinary action.

A deliberate breach or inappropriate disclosure maybe reported to the police for investigation as an offence.

## **Approach**

Our information governance approach gives us a framework within which information is collected, held and used. It is based on four key areas:

Systems, Policies, Information, People

1. Systems – the systems we use to collect, store, organise and access information. This includes CRM systems, shared and personal folders, Sharepoint. Systems can also include ‘the way we do things’.  
The Commissioner has invested in an IT infrastructure and systems to support staff and associates in their roles. Information management systems

(CRM) are being developed that will allow contact information to be managed more systematically.

2. Policies and procedures – these are designed to support staff to treat information consistently and to comply with agreed procedures (both organisational and legal). Information governance policies, procedures and guidance are designed to ensure that the Commissioner's legal responsibilities are fulfilled and that risks are identified and managed.
  
3. Information – to manage information well and to be legally compliant we need to know what kinds of information we hold and why, where and how it is held, how we can access it and when to retain or destroy. Some categories of information may be more sensitive and have a higher degree of risk associated with it.  
An information asset audit has been undertaken to understand the type of information we routinely hold and the organisational risks associated with this. Our policies, procedures and practices have been reviewed and developed to address the risks and to practically support the ways we need to work.
  
4. People – our greatest asset and also a key area of risk. Most often it is human error rather than system failure that is responsible for breaches, accidental loss or inappropriate disclosures of information. We are implementing clear policies and procedures and a training plan to ensure all our staff build their knowledge and understanding of our duties under FOIA and data protection law. Our improved policy and guidance documents will provide sources of information and ongoing support to staff.

### **Induction and Training**

New staff will have a structured compulsory induction covering the basics of the Commissioner's information governance arrangements. A training resource will be developed that all staff will be required to complete and successfully pass. This training will be repeated annually.

Further training /awareness- raising will be provided as new or business issues are identified.

### **Further Information, Advice & Support**

In the first instance you should contact our Data Protection Officer (DPO) Sang-Jin Park with any information governance queries.

Information Commissioner's Office – Wales  
2nd Floor, Churchill House  
Churchill Way  
Cardiff, CF10 2HH  
Telephone: 029 2067 8400  
Fax: 029 2067 8399  
Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)

<https://ico.org.uk>

## Appendix A - Information Governance Structure

