

<b>Meeting</b>	<b>SPA Audit, Risk and Assurance Committee</b>
<b>Date</b>	<b>20 January 2022</b>
<b>Location</b>	<b>By video-conference</b>
<b>Title of Paper</b>	<b>SPA Information Management Strategy</b>
<b>Presented By</b>	<b>John McNellis, Head of Finance Audit and Risk</b>
<b>Recommendation to Members</b>	<b>For discussion</b>
<b>Appendix Attached</b>	<b>Appendix A: SPA information management strategy</b>

**PURPOSE**

To provide the Audit Risk and Assurance Committee (ARAC) with an overview of the SPA's information management strategy including the action plan for delivering the strategy.

*The paper is presented in line with the corporate governance framework of the Scottish Police Authority (SPA) and Audit, Risk and Assurance Committee (ARAC) terms of reference and is submitted for consultation.*

## 1. BACKGROUND

- 1.1 The SPA has its own information management (IM) staff and senior information risk owner (SIRO) with overall responsibility for all aspects of the management and governance of information assets of SPA Corporate and Forensic Services. Police Scotland has its own IM function.
- 1.2 In 2018 the SPA invited the Information Commissioners Office (ICO) to conduct a consensual audit of the SPA's compliance with data protection legislation with a further follow up audit in late 2020. This report made a total of 75 recommendations but did provide "reasonable assurance that processes and procedures are in place and are delivering data protection compliance".
- 1.3 Since the ICO audit, significant progress has been made and is regularly reported to management and the ARAC.
- 1.4 The SPA 2020 restructure included various changes to strengthen the SPA's IM capacity and capability. This included the following new staff / posts:
  - Senior Information Risk Owner - SIRO (Deputy Chief Executive, Resources);
  - Head of Finance, Audit and Risk (with day to day responsibility for the IM function); and
  - Information Assurance Officer role.

## 2. FURTHER DETAIL ON THE REPORT TOPIC

- 2.1 The majority of ICO recommendations have now been completed with work well developed to close the remaining actions.
- 2.2 With new staff in post, led by the SIRO, it was considered important to re-set the IM function and provide a positive improvement focus for the team to look towards as well as re-launching and promoting IM to the wider SPA and Forensics Service.
- 2.3 To achieve this, the IM team have developed **the SPA's first Information Management Strategy** which sets out **a clear vision and outcomes** for how we will provide a professional IM service.

- 2.4 To deliver the aims of the strategy there is an **action plan** with measurable actions that shows how the strategy outcomes will be achieved. These actions **will continue to iterate** and will be included within the SPA business plan and IM staffs' personal objectives. Progress will be monitored through existing processes i.e. business plan monitoring and staff's personal development conversations (PDC's i.e. our staff appraisal process).
- 2.5 The full SPA information management strategy is included at **appendix A**.
- 2.6 This strategy is provided to the ARAC for consultation. Whilst primarily a management tool, given the past and ongoing IM challenges, it was considered important to provide the committee with sight of the SPA's ongoing improvement plans.

### **3. FINANCIAL IMPLICATIONS**

- 3.1 There are no financial implications associated with this paper. Whilst delivery of the strategy is dependent on additional staff resources, these have been budgeted and included in the SPA 2020 business case.

### **4. PERSONNEL IMPLICATIONS**

- 4.1 There are no additional personnel implications associated with this paper. As above the additional staffing implications have been included in the SPA 2020 business case.

### **5. LEGAL IMPLICATIONS**

- 5.1 There are no legal implications associated with this paper. However, the Information Commissioner can undertake enforcement on the SPA if it fails to meet its information rights obligations.

### **6. REPUTATIONAL IMPLICATIONS**

- 6.1 There are no specific reputational implications associated with this paper.

### **7. SOCIAL IMPLICATIONS**

- 7.1 There are no social implications associated with this paper.

### **8. COMMUNITY IMPACT**

8.1 There are no community impact implications associated with this paper.

**9. EQUALITIES IMPLICATIONS**

9.1 There are no equality implications associated with this paper.

**10. ENVIRONMENT IMPLICATIONS**

10.1 There are no environmental implications associated with this paper.

**RECOMMENDATIONS**

Members are requested to note the SPA information management strategy.

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SCOTTISH POLICE  
AUTHORITY

# Information management strategy

JANUARY 2022



# Foreword

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Information is a key asset of the Scottish Police Authority (SPA) from which we can better serve the public by managing these assets.

Equally we must ensure that data is closely protected and we adhere to the highest standards of information security to maintain confidence from our staff and the people we serve.

The SPA's information management (IM) function has been rightly challenged by findings from the Information Commissioner's reports. This combined with the recent SPA restructure presents an ideal opportunity to re-set the role and operation of the information management service.

This strategy sets out an ambition to deliver a high performing IM service that works for the benefit of all policing. It provides the foundation for continuous improvement and ultimately a service that is sector leading and achieves Best Value for the public.

**Chris Brown**

Interim Chief Executive

Senior Information Risk Owner (SIRO)



# Background

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## What is information?

Information is defined as any hard copy or electronically held data, structured or otherwise, being processed by the Scottish Police Authority.

This includes:

- any **printed or handwritten** documents, including correspondence received by the Authority;
- **electronically held** documents, including images, email, office documents, social media, audio and video information (often referred to as **unstructured information**);
- information held in a database or similar repository, asset management information or finance information (often referred to as **structured information**); and
- **informal or tacit information** held by individuals in notes of meetings, diaries, knowledge banks, etc.

This broad and wide ranging definition has the implication that any information, in whatever shape or form, needs to be managed with an appropriate level of care and attention.

Information is essential to all staff, at all levels, and across all functions so they can carry out their day to day duties. The Authority has legal obligations to safely manage and secure the information processed, but it also needs to dispose of information that is no longer required by the Authority. We must develop a culture that understands there is a balance between the costs of maintaining the information held, versus the value of that information to the Authority and the services that it delivers. This is a fundamental **Best Value principle**.

## What is information management?

Information management (IM) describes the means by which an organisation “efficiently governs, plans, controls, collects, creates, evaluates, organises, stores, analyses, disseminates, maintains, and disposes of its information, and through which it ensures that the value of that information is identified and exploited to the fullest extent” (Laffan, B)

Information management is not just an ICT issue. It incorporates many elements including the nature of the information, the technology used to manage the information, the people (both skills and behaviour) used to work with the information - and the governance applied to the information including management and leadership.

## Information lifecycle

Through this Information Management Strategy the Authority recognises that information is an asset to the service and that we need to manage information through its lifecycle – no different from managing any other asset.

Like any other asset, information has a value to the Authority, its staff, communities and partners. The Authority needs to manage the creation, collection and use of information in a cost effective manner, but more importantly if managed effectively the information has the **capability to aid effective decision making** and **support the efficient delivery of the services** provided.

# External context

Information management is under ever increasing external scrutiny from legislation, regulators and demands from the public.

## UK GDPR / Data Protection Act

Data Protection legislation covers the processing of personal data and is overseen by the Information Commissioner's Office (ICO) in the UK. Organisations processing personal data must appoint a Data Protection Officer and are required to notify the nature of their processing with the Commissioner's Office. Failure to comply with the requirements of the legislation can result in fines of several million pounds.

The Act gives data subjects the right to request and receive, subject to limited exemptions, information that the Authority is processing in respect of them.

## Public Records (Scotland) Act 2011

This Act requires the Authority to have a Public Records Plan, which must be approved

by the Record Keeper of Scotland. The Plan has 14 elements which the Authority must comply with. The Keeper may serve a notice under section seven of the Act and report to Scottish Ministers should the Authority fail to comply with the requirements.

## Freedom of Information (Scotland) Act 2002

The Act is overseen by the Office of the Scottish Information Commissioner. It states that a person who requests information from a Scottish public body is entitled to be given it by the authority subject to certain conditions and exemptions. The IM team will continue to work closely with SPA colleagues as the expert advisor on FOI matters.

## ISO 27001 compliance

In order to be part of the trusted police community, the Authority has to comply with the controls of ISO 27001. An annual statement of compliance is provided to the Police Information Assurance Board (PIAB).

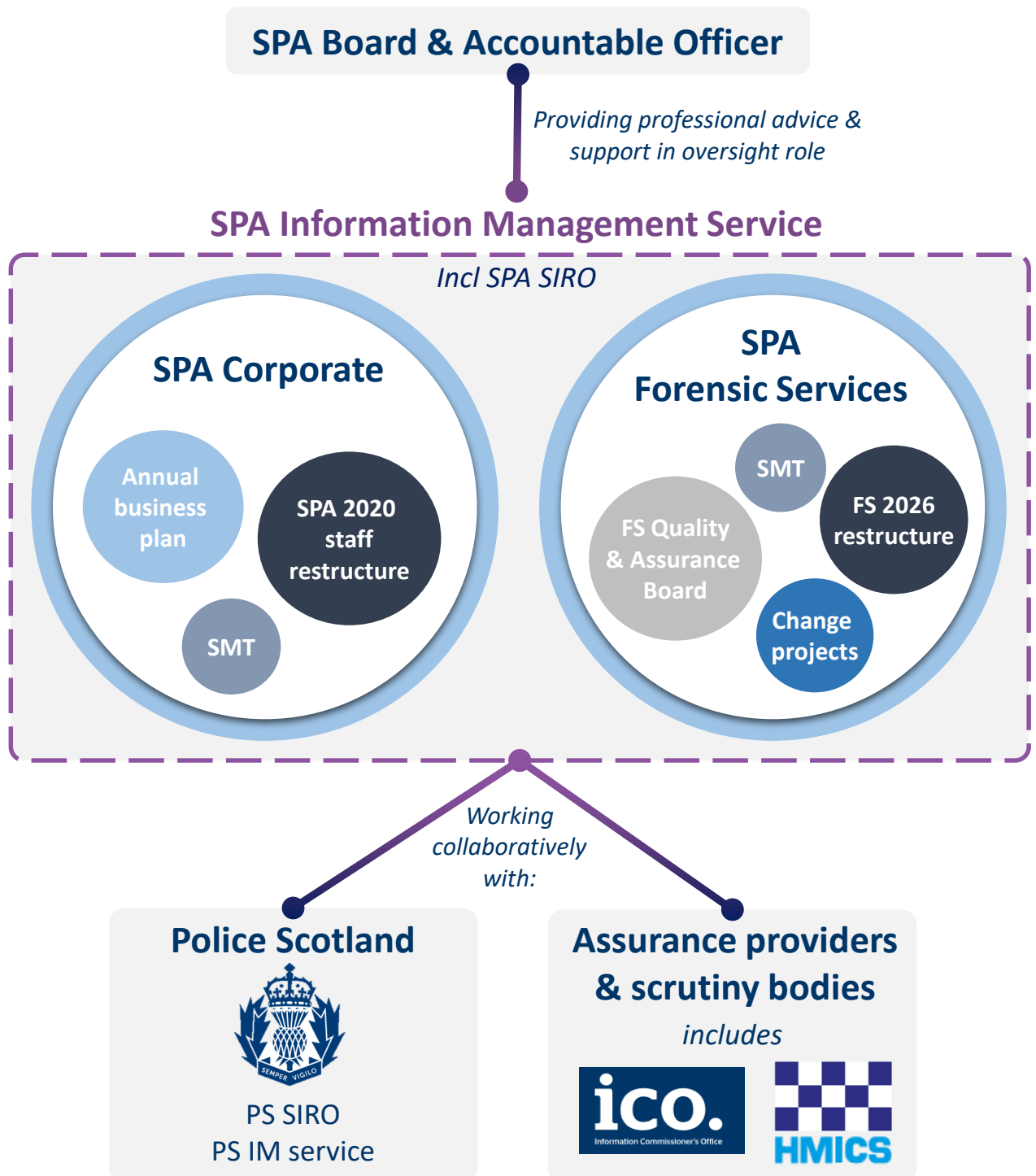




# Internal context

The scope of the SPA's information management service provides direct support to SPA Corporate and Forensic Services functions. In addition, it provides professional advice to the Board and Accountable Officer to discharge their oversight role.

This role is illustrated below which relies on close working with Police Scotland and other key stakeholders.



# Vision, values & outcomes

The SPA information management service is proposing a vision for the reinvigorated function supported by the SPA's competency and values framework and the IM functions new five strategic outcomes.



# Delivery of the strategy

## How will we deliver the IM strategy?

The SPA SIRO has accountability for the strategy whilst the plan will be delivered by the IM team. This strategy is supported by a detailed action plan at **appendix A** which will form part of the SPA business plan and IM staff's personal objectives.

One aspect of the plan is developing and delivering regular IM dashboard reporting to the SPA's senior management team (SMT) that will include elements on progress towards delivery of the strategy.

## Measuring performance

Ongoing measurement of performance is critical to ensuring the success of the strategy. As part of the SPA's annual business plan, the progress of implementing this strategy will be monitored and reported to the SMT and Audit, Risk and Assurance Committee.

## Roles & responsibilities

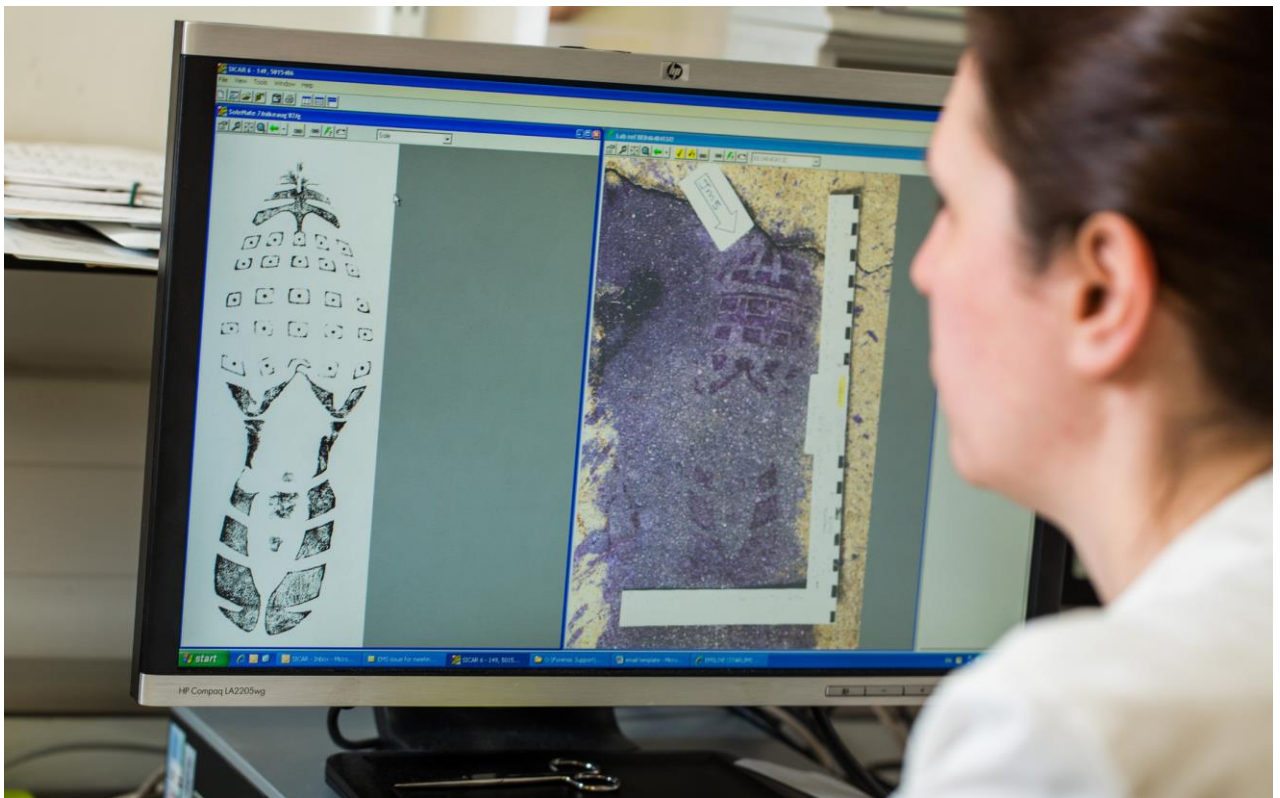
This strategy cannot succeed without the input and buy-in from across the SPA, Police Scotland and key partners.

IM staff will work collaboratively with SPA and PS colleagues and aim to bring them with IM on this improvement journey.

A RACI matrix (showing responsible, accountable, consulted and informed) is included at **appendix B**. This will be used as part of the promotion of this strategy.

## Next steps

The IM team will be promoting this strategy through roadshows across SPA Corporate and Forensic Services in addition to targeted meetings with key partners.



# Appendix A – action plan

#	Theme	Activity	Description	Target date	Measures of success
<b>1. Promotion, empowerment &amp; advocacy</b>					
1.1	Training	Establish a training plan	<ul style="list-style-type: none"> <li>Conduct a training needs assessment for IM incorporating the needs of: SPA corporate, forensics services and Board Members.</li> <li>The plan should identify who should receive training and how often.</li> <li>Establish which method is most suitable for the training to be delivered and recorded (ie moodle/ face to face/ recorded/ externally facilitated).</li> <li>Include a monitoring programme to assess the effectiveness of training eg through survey and course tests.</li> </ul>	March 2022	Completion of training plan.
1.2	Training	Update and deliver training	<ul style="list-style-type: none"> <li>Update induction IM training for staff and Members.</li> <li>Develop/Launch/Refresh annual refresher training for all staff. Including when to consult IM re procurement and collecting new data.</li> <li>Identify a way for staff to feedback re training – are they getting what they need? Is it meeting the business needs? Does it reflect any changes in legislation?</li> </ul>	June 2022	Feedback, reduction in security incidents. Training completion rates. Training effectiveness measures.
1.3	Comms	Intranet / internet	<ul style="list-style-type: none"> <li>Review current intranet / internet provision and seek to improve information and accessibility.</li> <li>Includes review of the SPA publication scheme in conjunction with colleagues.</li> <li>Be clear on who IM is / our role / key staff and when to engage.</li> </ul>	TBC In line with revised SPA website	Reduction in small ticket questions to IM. Increased compliance (DPIA reporting, security incidents).
1.4	Comms	IM strategy / roadshows	<ul style="list-style-type: none"> <li>Formally launch the IM strategy to stakeholders. Including liaison with Members, SPA staff and interested other stakeholders.</li> <li>Relaunch periodic IM roadshows with the support of the corporate services team.</li> </ul>	February 2022	Feedback from stakeholders.
1.5	Comms	IM staff handbook	<ul style="list-style-type: none"> <li>Update the IM staff handbook and re launch to staff.</li> </ul>	March 2022	Feedback from staff, Increased compliance and engagement.
1.6	RACI	Complete an IM RACI	<ul style="list-style-type: none"> <li>Clarify the role of IM, SIRO and PSoS and their responsibilities.</li> <li>Have a clearer picture of IM role (when and how to consult us).</li> <li>Have better engagement with SPA Legal team.</li> <li>Clarify responsibility for training plan.</li> </ul>	January 2022	Completed RACI.

# Appendix A – action plan *(continued)*

#	Theme	Activity	Description	Target date	Measures of success
<b>2. Compliance with legislation and regulations</b>					
2.1	Compliance	Outstanding recommendations	<ul style="list-style-type: none"> <li>Complete current audit recommendations to ensure that legislation/ regulations are met. Including setting out which regulations/legislations are applicable.</li> <li>Focus on long standing and recommendations past their agreed due date.</li> </ul>	In line with individual completion dates	All recommendations closed. No recommendations past due date.
2.2	Audit	Audit programme	<ul style="list-style-type: none"> <li>Create an annual risk based IM audit plan. This will outline the planned audit activities for the year.</li> <li>Evaluate the outcome of audit work. Identify learning/ training requirements, etc and where applicable make and implement improvement recommendations.</li> </ul>	April 2022  December 2022	Audit Plan and survey complete.
2.3	Security incidents	Managing security incidents	<ul style="list-style-type: none"> <li>Review current process for reporting and managing security incidents ensuring that staff are aware of what to do in the event of a security incident.</li> <li>Review and update the security policy to make sure it is user friendly and accessible.</li> <li>Identify recurring themes and ensuring there is a process to learn from incident that inform the audit process.</li> </ul>	February 2022	Increased awareness of process for reporting security incidents, security incidents reported on time, correct form used by staff.
2.4	Security incidents	Home working	<ul style="list-style-type: none"> <li>Ensuring that IM policy and security incidents appropriately assess the new state of hybrid home / office working.</li> </ul>	February 2022	Increased awareness of process for reporting security incidents, security incidents reported on time, correct form used by staff.

# Appendix A – action plan *(continued)*

#	Theme	Activity	Description	Target date	Measures of success
<b>3. Balance between security &amp; accessibility, quality and unlocking value</b>					
3.1	Reduce duplication	SPA Corporate file structure	<ul style="list-style-type: none"> <li>Enhance the central file structure / system for SPA corporate.</li> <li>Include training of the benefits and importance of good records management.</li> </ul>	March 2022	Delivery of new file plan.
3.2	Better service	SPA Forensics file structure	<ul style="list-style-type: none"> <li>Develop a project plan for the Forensic Services file structure.</li> <li>Progress and monitor the implementation of the file structure.</li> </ul>	TBC following engagement	Delivery of new file plan.
3.3	Better service	SPA Corporate SharePoint	<ul style="list-style-type: none"> <li>Identify and upload key documents that should be on SharePoint.</li> <li>Audit to ensure that SharePoint is being correctly used.</li> </ul>	April 2022	Delivery of SharePoint and appropriate use.
3.4	Better service	Customer focus	<ul style="list-style-type: none"> <li>All aspects of this action plan and IM activities should include consideration of the implication on our customers (the service).</li> <li>Decisions and advice should provide options and rationale for professional advice balancing protecting our assets and accessibility.</li> </ul>	August 2022	Examples of detailed advice notes and options provided to problems. Feedback from customers/SMT.
<b>4. Anticipate future demands</b>					
4.1	Transformation	Internal SPA / forensics change projects	<ul style="list-style-type: none"> <li>Ensure IM is appropriately represented on relevant project boards to provide specialist advice and feedback on the development and finalisation of business cases and project plans eg Forensics 2026 / project weaver.</li> </ul>	February 2022	Representation at project boards.
4.2	Transformation	Hybrid working	<ul style="list-style-type: none"> <li>Identify the needs of the business and staff.</li> <li>Provide suitable solutions whilst not compromising on security.</li> <li>Include an aid memoire / checklist of expectations from staff when home working and ensure detail is well communicated through staff briefing and other comms.</li> </ul>	April 2022	Needs identified and managed. Appropriate documentation in place.
4.3	IM change	New threats	<ul style="list-style-type: none"> <li>Develop a process for considering new threats and informing business areas.</li> <li>Ensure that any changes in legislation/regulations are highlighted and actioned.</li> <li>Identify which business areas its applicable to and engage early.</li> </ul>	May 2022	Model for assessing and communicating threats agreed.
4.4	Procurement	New threats	<ul style="list-style-type: none"> <li>Ensure there are clear policies / procedures on when to involve and consult with IM with tenders and new contracts.</li> </ul>	May 2022	Early involvement in procurement. Updated policy.

# Appendix A – action plan *(continued)*

#	Theme	Activity	Description	Target date	Measures of success
<b>5. Partnerships</b>					
5.1	Engagement	Horizon scanning	<ul style="list-style-type: none"> <li>Work with SPA Performance and Strategy team to identify future development and whether there are IM considerations and their potential impact on future planning.</li> </ul>	February 2022	Process agreed for communicating areas of interest.
5.2	Data sharing	SPA Corporate Services Data sharing agreements	<ul style="list-style-type: none"> <li>Review all current data sharing agreements.</li> <li>Create a target list of required agreement and progress.</li> </ul>	August 2022	Target list completed. Agreements in place.
5.3	Data sharing	Forensics data sharing	<ul style="list-style-type: none"> <li>Collate a list of current sharing practices and those with an existing data sharing agreement.</li> <li>Engage with third parties to ensure that suitable agreements in place.</li> <li>Ensure staff are aware of the process when engaging in data sharing and the need for a data sharing agreement where new agreements will be entered into.</li> </ul>	August 2022	Target list completed. Agreements in place.
5.4	Partner projects	Partner projects (PS and external)	<ul style="list-style-type: none"> <li>Ensure IM attendance at project meetings and provide ongoing specialist support to the project.</li> <li>Formalise regular monthly meeting with PS and COPFS including for the DESC project.</li> </ul>	Ongoing	Ongoing engagement with projects.

# Appendix B - RACI matrix

#	Process	Information management team	SIRO	SPA corporate	Forensic services	Police Scotland
<b>1. Promotion, empowerment &amp; advocacy</b>						
1.1	Establish a training plan	R A C I	R A C I	R A C I	R A C I	R A C I
1.2	Update and deliver training	R A C I	R A C I	R A C I	R A C I	R A C I
1.3	Comms – intranet / internet	R A C I	R A C I	R A C I	R A C I	R A C I
1.4	Comms – IM strategy / roadshows	R A C I	R A C I	R A C I	R A C I	R A C I
1.5	Comms – IM staff handbook	R A C I	R A C I	R A C I	R A C I	R A C I
1.6	RACI	R A C I	R A C I	R A C I	R A C I	R A C I
<b>2. Compliance with legislation &amp; regulations</b>						
2.1	Outstanding recommendations	R A C I	R A C I	R A C I	R A C I	R A C I
2.2	Audit programme	R A C I	R A C I	R A C I	R A C I	R A C I
2.3	Managing security incidents	R A C I	R A C I	R A C I	R A C I	R A C I
2.4	Home working (security incidents)	R A C I	R A C I	R A C I	R A C I	R A C I



Responsible



Accountable



Consulted



Informed



# Appendix B - RACI matrix *(continued)*

#	Process	Information management team	SIRO	SPA corporate	Forensic services	Police Scotland
<b>3. Balance between security &amp; accessibility, quality and unlocking value</b>						
3.1	Reduce duplication – SPA corporate file structure	R A C I	R A C I	R A C I	R A C I	R A C I
3.2	Better service – forensic services file structure	R A C I	R A C I	R A C I	R A C I	R A C I
3.3	Better service – SPA corporate SharePoint	R A C I	R A C I	R A C I	R A C I	R A C I
<b>4. Anticipate future demands</b>						
4.1	Transformation – internal change projects	R A C I	R A C I	R A C I	R A C I	R A C I
4.2	Transformation – hybrid working	R A C I	R A C I	R A C I	R A C I	R A C I
4.3	IM change – new threats	R A C I	R A C I	R A C I	R A C I	R A C I
4.4	Procurement – new threats	R A C I	R A C I	R A C I	R A C I	R A C I
<b>5. Partnerships</b>						
5.1	Engagement – horizon scanning	R A C I	R A C I	R A C I	R A C I	R A C I
5.2	Data sharing – SPA corporate data sharing agreements	R A C I	R A C I	R A C I	R A C I	R A C I
5.3	Data sharing – forensics data sharing agreements	R A C I	R A C I	R A C I	R A C I	R A C I
5.4	Partner projects (PS and external)	R A C I	R A C I	R A C I	R A C I	R A C I



Responsible



Accountable



Consulted



Informed