

Section 4 Integrated Impact Assessment

Interim report		Final report	X	(Tick as appropriate)
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1. Title of proposal

City of Edinburgh Council's Information Governance Policy – Update of Policy Framework

2. What will change as a result of this proposal?

The Council has had a Records Management Policy since 2005, with additional policies being added in 2014 on Data Protection, Data Quality and Freedom of Information, as well as an overarching Information Governance Policy to tie them together. These policies were refreshed in 2018 to incorporate legislative changes required by the Data Protection Act 2018.

Feedback from the Council's HR service, as well as individual colleagues and councillors over several years has suggested that 95+ pages of policy content on information governance was difficult to go through and understand what compliance requirements applied to them. Much of the content, especially around responsibilities, was duplicated across the suite of policies. There was also a perceived disconnect between the policy compliance statements and the realities and complexities of managing information in the Council, which discouraged engagement.

In response to this feedback, the Council's Information Governance Unit, as the policy suite owners, decided in 2020 to merge the policy suite into a single overarching Information Governance Policy. This policy would detail the management framework and overarching responsibilities. The document would then be supported by specific standards and guidance that would outline what compliance looks like in specific areas (e.g. digital records management, personal data collection, publication of data). The aim is that these standards will be more applicable for Council services, allowing them to self assess where they comply and identify what they need to do to improve their information management practices, processes and functionality.

In February 2021 this new Information Governance Policy was approved by the Policy and Sustainability Committee, with the commitment from the Information Governance Unit to develop additional standards.

3. Briefly describe public involvement in this proposal to date and planned

The public have not been involved in this policy and there is no intention to do so given its administrative focus. However, the policy was considered and approved as part of a Strategy & Communications policies report at the Policy and Sustainability Committee Report meeting on 23 February 2021.

4. Is the proposal considered strategic under the [Fairer Scotland Duty](#)?

No.

5. Date of IIA

Wednesday 20th of October, 2021

6. Who was present at the IIA? Identify facilitator, Lead Officer, report writer and any partnership representative present and main stakeholder (e.g. NHS, Council)

Name	Job Title	Date of IIA training
Kevin Wilbraham, Lead Officer	Information Governance Manager	
Henry Sullivan, Facilitator & Report Writer	Information Asset Manager	
Derek Masson	ICT Programme & Delivery Manager	
Alison Coburn	Operations Manager (Place)	
Angela Ritchie	Operations Manager (Edinburgh Health & Social Care Partnership)	
Frances Smith	Advice & Complaints Officer (Education)	

Support in preparing the meeting through guidance and evidence gathering was also provided by the following individuals:

Name	Job Title	Date of IIA training
Sarah Hughes-Jones	Information Compliance Manager	

7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
2021 CEC Information Governance Policy	Council website - LINK	Current policy
2018 CEC Information Governance Policy / Management System	Document provided to panel	Map of policy framework with standards, guidance and assessment
CEC Information Governance Standard Template	Document provided to panel	Outline of what will be included in a Council Information Governance Standard
Pre-2021 CEC Information Governance Policies: Information Governance Policy Records Management Policy Managing Personal Data Policy Information Rights Policy	Document provided to panel	Pre 2021 Information Governance Policies

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
Data Quality Policy		
Corporate Policy and Strategy Committee Report on new Information Governance Policies 30 Sept 2014	Council website - LINK	2014 committee report that outlined the Council’s combined multi-disciplinary policy approach to information governance compliance
Policy and Sustainability Committee Report on Strategy & Communications policies 23 February 2021	Council website - LINK	2021 committee report explaining the shift from multiple policies to a single policy supported by additional standards and guidance
Guidance from Model Records Management Plan – Element 3 Records Management Policy Statement	National Records of Scotland website (LINK)	Regulator guidance on the necessity of having of an organisational policy statement on records management
UK Information Commissioner’s Accountability Framework; Policy and Procedures section	Information Commissioner’s Office website - LINK	Regulator guidance on the necessity of having of an organisational policy statement on data protection
Office of the Scottish Information Commission’s Guidance; Managing FOI	OSIC website - LINK	Regulator guidance on the necessity of having of an organisational policy statement on access to information
Section 60 Code of Practice; Best practice guidance for public authorities on discharging their functions under the FOI Act and Environmental Information Regulations	Scottish Government website - LINK	Statutory guidance on how public authorities must deal with requests for information
Section 61 Code of Practice; Guidance for public authorities about the keeping, management and destruction of their records	Scottish Government website - LINK	Statutory guidance on how public authorities should manage their records to ensure information is available for public access
Historical Abuse Systemic Review Residential Schools and Children’s Homes in Scotland 1950 to 1995	University College London’s Digital Education Resource Archive - LINK	The fifth chapter of the report focuses on the importance of records to both the investigation and to the care experienced, as well as the widespread poor historic record keeping that was revealed in the children’s social care sector.
CELCIS – Access to care records briefing	CELCIS website - LINK	Briefing note that outlines the importance of care records to the care experienced
Environmental Rights Centre for Scotland’s overview of the <i>Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters</i>	ERCS website - LINK	Outline of the right to environmental information enshrined in the U.N. Aarhus Convention treaty.

8. In summary, what impacts were identified and which groups will they affect?

<p>Equality, Health and Wellbeing and Human Rights</p> <p>Positive</p> <p>New approach will be easier for staff to understand what they need to do to comply with the Council’s information governance requirements, which will lead to improved compliance, which will in turn lead to better health and wellbeing outcomes for Edinburgh’s residents and the Council’s service users.</p> <p>New approach will create and manage records better, while also providing appropriate access to them or auditors, regulators and the public to ensure transparency and accountability.</p> <p>New policy approach better supports working from home for staff through improved access to Council records and data, which can lead to improved wellbeing.</p> <p>New approach will better support the sharing of personal data with third parties to facilitate services, protect vulnerable individuals and reduce crime.</p> <p>Negative</p> <p>The new policy is still going to be difficult to understand for some population groups, leading to unequal understanding of rights and responsibilities.</p> <p>No webpage or plain English document on the Council’s information governance responsibilities for public consumption.</p> <p>Policy is only in English</p>	<p>Affected populations</p> <p>Staffing groups</p> <p>All populations</p> <p>All populations</p> <p>Staffing groups</p> <p>Children and Vulnerable Adults All Populations</p> <p>Populations with low literacy</p> <p>Populations with English as a foreign language</p>
<p>Environment and Sustainability including climate change emissions and impacts</p> <p>Positive</p> <p>New approach is paper / digital neutral but tied to the Digital and Smart City Strategy, with new platforms being developed to support greater digital working. This has</p>	<p>Affected populations</p> <p>Staffing groups</p> <p>Urban communities</p>

<p>knock on benefits on reducing paper consumption and travel.</p> <p>New approach will ensure that public access to environmental information is maintained and its proactive publication becomes a Council objective.</p> <p>Negative</p> <p>None identified</p>	<p>All geographically defined populations</p>
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<p>Economic including socio-economic disadvantage</p> <p>Positive</p> <p>New approach will hopefully be easier for staff to understand what they need to do to comply with the Council's information governance requirements, which will lead to improved compliance, which will in turn lead to better economic outcomes for Edinburgh's residents and the Council's service users.</p> <p>Negative</p> <p>Policy is only published online.</p>	<p>Affected populations</p> <p>All populations</p> <p>Those populations who do not have online access</p>
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9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children's rights, environmental and sustainability issues be addressed?

No.

10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.

The Information Governance Unit has had an annual communications plan in the past. This will be refreshed shortly for 2022, after a COVID-19 related hiatus. This plan will include elements of public engagement, including key audiences of children and adult service users, as well as approaches to reach audiences without online access.

11. Is the policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a [Strategic Environmental Assessment](#) (SEA) will be required and the impacts identified in the IIA should be included in this.

No.

12. Additional Information and Evidence Required

The panel did not feel that they required any further evidence to consider.

13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Re-establish annual Information Governance Unit communications plan and include elements of public engagement	Kevin Wilbraham, Information Governance Manager	November 2021	December 2022
Highlight to the Council's Governance Team that a link between its Policy Register webpages should be linked to the language translation pages	Kevin Wilbraham, Information Governance Manager	November 2021	
Review Council website content on information governance and create an overarching page that explains in plain English the Council's requirements and management system	Kevin Wilbraham, Information Governance Manager	December 2021	December 2022
Update the Council's Information Governance Maturity Assessment questionnaire and report template to include questions and results on impacts on equalities, health & welfare, rights, environment and the economy that local information management practices, processes or systems might have	Kevin Wilbraham, Information Governance Manager	December 2021	December 2022
Create a document with key messages and explanation of new management system	Kevin Wilbraham, Information Governance Manager	December 2021	December 2022
Investigate and identify a means of routine public feedback around information governance compliance	Kevin Wilbraham, Information Governance Manager	December 2021	December 2022
Develop a training plan for staff to ensure that all colleagues are aware of their responsibilities as well as what support there is for them	Kevin Wilbraham, Information Governance Manager	March 2022	October 2022

- 14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?**

No.

- 15. How will you monitor how this proposal affects different groups, including people with protected characteristics?**

The Council's Information Governance Maturity assessment questionnaire will be updated to include questions for services to complete on any perceived positive or negative impacts their information management practices, processes and systems have on different groups. This will form part of the annual assessment and will be fed back to the Information Board for consideration, resolution or escalation, as required.

- 16. Sign off by Head of Service/ NHS Project Lead**

Name: Nick Smith, Service Director of Legal & Assurance

Date

- 17. Publication**

Completed and signed IIAs should be sent to strategyandbusinessplanning@edinburgh.gov.uk to be published on the IIA directory on the Council website www.edinburgh.gov.uk/impactassessments

Edinburgh Integration Joint Board/Health and Social Care

sarah.bryson@edinburgh.gov.uk to be published on the www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/