THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA

LONDON BOROUGH OF HAMMERSMITH AND FULHAM

JOINT MANAGEMENT TEAM

TRI BOROUGH BUSINESS INTELLIGENCE PILOT

INFORMATION GOVERNANCE POSITION STATEMENT

The Joint Management Team is invited to comment on the Information Governance Position Statement which sets out the activities to develop information governance to support a future Tri Borough Business Intelligence service.

For information and discussion

The Information Governance Statement is a supporting document for the Tri Borough Business Intelligence (BI) business case that will be submitted to Bi borough Transformation Board on 22nd January 2014.

1 Introduction

Critical to the working of a Tri-borough Business Intelligence (BI) service is the ability to source, share, process and use information and data. Developing a Tri-borough BI Pilot therefore requires appropriate information governance. This Information Governance Position Statement sets out a road map of processes and templates to develop BI information governance, in order to ensure maximum use of data whilst maintaining legal/organisational compliance.

These suggested processes and templates have been developed collaboratively (see Appendix A) with the key challenges and opportunities of Tri-Borough BI in mind. However, while all processes and templates will directly support BI, as an added benefit most have wider Tri-Borough applicability and potential use.

This Position Statement represents an agreed scope by the stakeholders involved of what work is needed to make data sharing for Tri-Borough BI work well. A decision is required to authorise this scope.

Next steps following decision are to:

- Prioritise the suggested processes and templates based on most efficient, logical or time sensitive way forward
- Schedule resourcing and development including responsibilities and timescales.

2 Information sharing and use needs in Business Intelligence: data warehousing

A data warehouse is a database used for reporting and data analysis. It is a central repository of records that are created by integrating data from one or more disparate sources. Data warehouses store current as well as historical data in records and are used for analysis, modeling and forecasting to support management decision making.

Benefits to the Tri-Borough of data warehousing include:

- Reduction of the amount of effort, time and cost associated with acquiring, integrating and preparing data for analysis and reporting. This in turn provides analysts with the opportunity to spend more time analysing data sets and identifying useful insights.
- Increased consistency of information used across the Tri-Borough for reporting and analysis (one set of numbers).
- Removal of the barriers and limitations associated with siloed information.
- Non-technical specialists enabled to perform data analysis for themselves.
- Data quality is systematically measured. This doesn't solve the problem of poor data quality but:
    - it makes it easier to manage the problem and;
    - it enables managers to factor quality of information into their decision-making.
- Information is presented in a format that minimises processing times for complex analysis enabling more of these operations to be carried out.
- Better means to understand the compliance requirements of any primary legislation governing the processing of data collected and stored by the business, for example the Local Government Finance Act 1992 for council tax data.
- Standardised approach to information security could reduce Tri-Borough risk of unauthorised information access or usage.

3 Information management concerns associated with data warehousing:

- Those responsible for information sharing and usage have a reduced capacity for control over the data.
- A data warehouse is a single point of failure for unlawful information access and usage. Security risks could increase with more data sharing.
- Data quality and consistency is uneven and could make it difficult to integrate and match data.
- Poor data quality reduces the potential value to be derived from a single, integrated information set.
- Ensuring compliance with legislation in a data warehouse could be complex.
- Inappropriate data matching could impact negatively upon the public, increase service user/customer complaints and could cause reputational damage.
- Technical complications could arise interfacing across systems, including how to manage masking sensitive data.
- Clear retention and disposal controls are necessary to satisfy both primary and secondary legislation (such as principle 5 of the Data Protection Act 1998).

4 Information governance for BI – suggested processes and templates

This section details what would be needed to meet requirements of elements of information governance. The next steps following decision will be agreement on priorities and how to resource and develop each solution, including deciding accountabilities and responsibilities.

Element of data sharing	Suggested action, new process or document	Priority	Potential approach
Selecting datasets	1. Develop profiles of different core datasets, particularly Council Tax, the edited Electoral roll and ASC data	**High**	TBC
	2. Develop Business Intelligence project decision tree for selecting datasets	TBC	TBC
	3. Develop and establish Tri-borough template consent forms	TBC	TBC
Data use – personal and sensitive data	4. Establish standardised guidelines on how to meet Principles 1 and 2 and Schedule 2 and 3 conditions in Data Protection Act	TBC	TBC
	5. Develop a process flow chart on how to secure data sharing and use permission	**High**	TBC
	6. Develop Tri-borough Privacy Impact Assessment template	TBC	TBC
Data sharing with third parties	7. Use the Tri-borough Operational Information Sharing Agreement	TBC	TBC
	8. Use the register of existing mono/bi/tri-borough partnership information sharing protocols in place	TBC	TBC
	9. Use the Tri-borough Information Sharing Protocol template	TBC	TBC
Assurance of technical capability and using masking	10. Establish Tri-borough standards for technical assurance of information security and handling, including masking data	TBC	TBC
	11. Develop a statement of technical compliance that sets out how BI systems meet technical and masking requirements	**High**	TBC
Data and record retention and storage	12. Agree a retention and disposal mechanism for the data and records stored in data warehouse	TBC	TBC

5 Information governance for Business Intelligence – what needs to be done

Element	*What's needed to demonstrate compliance*	*Suggested processes or documents to be developed*	*Benefits*	*BI Pilot only or wider Tri-borough?*	*Project-by-project, or reusable?*
Data sets held by service areas across the Councils	See other sections	**1. Generic profiles of core datasets (e.g. Council Tax, edited Electoral Roll)** Each core data set would be profiled in order to create a re-usable, consistent set of information agreed by data owner and information managers. Profile would describe: A. What the data set contains (borough addresses, person end date, etc.) B. Compliant sets of information available by use (e.g., level 1 - *age group* and *end date* available for most purposes; level 2 - *address* and *specific age* available if xyz purpose demonstrated; level 3 - *name* available only if escalated and released by senior risk owner) C. Cost and means of extraction, including what interfaces have been already built with data warehouse D. What laws apply to that data set and what legal exemptions could be met to allow access (e.g. criminal investigation exception) E. Who the data owner is F. Masking and anonymising data options	Minimise effort associated with data set risk assessment Promote consistency of decision making Minimise Information Manager workload – would need to only develop a complete profile of each dataset once and tweak this as needed.	Wider Tri-borough use possible	Reusable

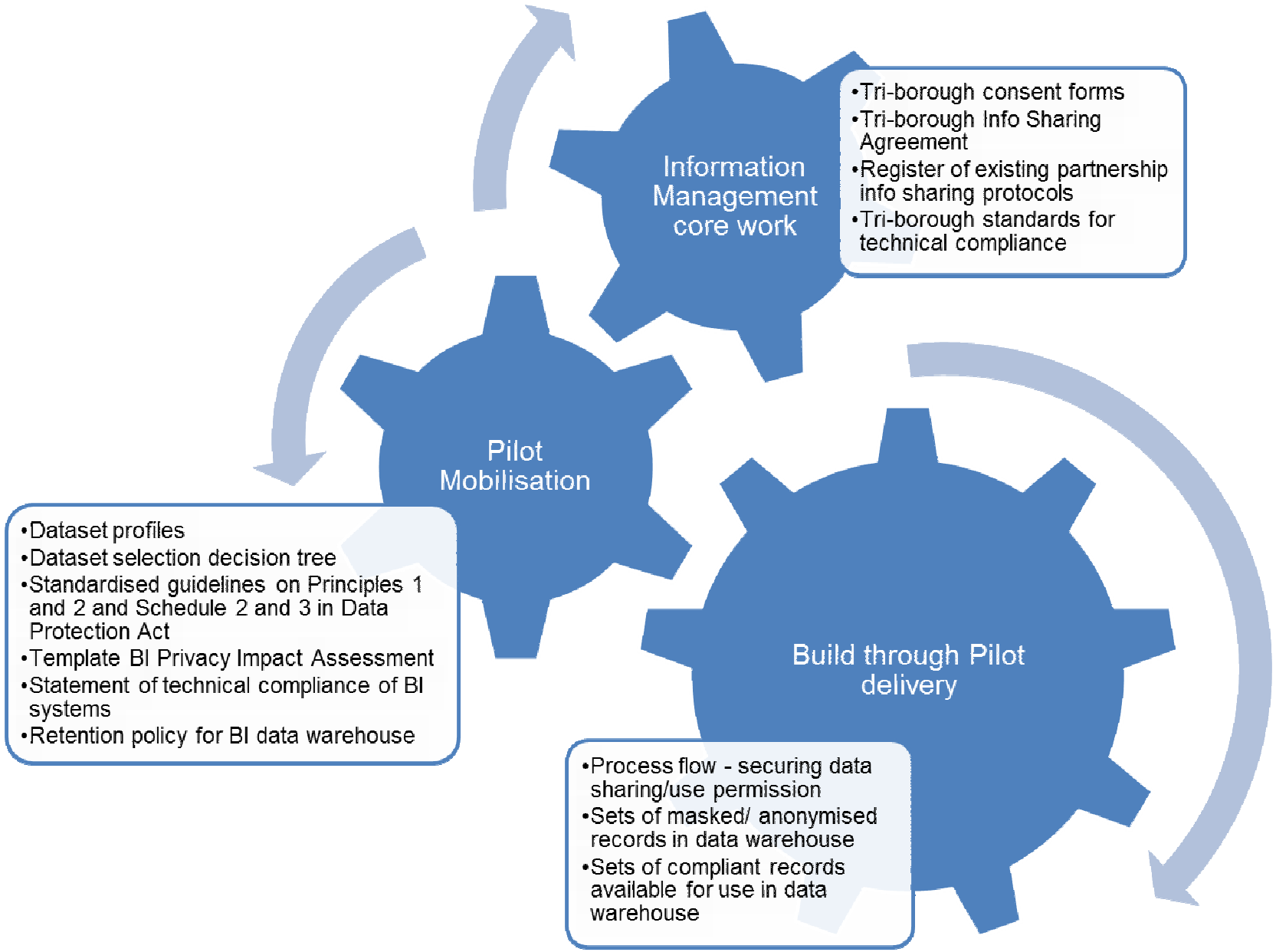
		and existing identifier tracking systems in place, if applicable G. Rating of data quality using agreed criteria/process H. Escalation road map should data owner refuse These profiles would be centrally maintained to assist with keeping up to date with law changes, and used by BI and other projects that need data to decide which data sets to pursue.			
		2. BI project dataset decision tree Decision tree to assist decision-making about which datasets to pursue for any given BI project.	Promote consistency of decision making and standardise BI project definition process Minimise Information Manager workload	BI Pilot relevant, but could be made generic for Tri-borough use if demand	Reusable
		3. Tri-borough consent forms guidelines/template for the business, designed to maximise potential data use whilst maintaining fairness, transparency and protecting privacy of data subjects. Issues will need to be resolved through the process of developing a consent template. These include concerns around service user choice, ensuring understanding of combining their data and likely impacts on them alongside a proportional consideration of how likely data collected will be used for BI purposes.	Consistent data usage and processing across Tri-borough Widest possible consent gathered at point of collection, enabling best use for best insights from BI	Wider Tri-borough use	Reusable

Element	*What needed to demonstrate compliance*	*Suggested processes or documents to be developed*	*Benefits*	*BI Pilot only or wider Tri-borough?*	*Project-by-project, or reusable?*
Data collection and use – personal (non sensitive) data	Must fulfil Principles 1 and 2 and legal condition of use in Schedule 2 of Data Protection Act. Project scope and outline plan that clearly states: - Purpose of using the data, why it is being sought - Type of data wanting to process and why this data in particular	**4. Standardised guidelines on how the Principles 1 and 2, and Schedule 2 and 3 conditions of use can be met**, including what types of data use purposes have been approved in the past that can be referenced	Promote consistency of decision-making. Minimise Information Manager workload	Standardised guidelines have wider Tri-borough use; examples could be built BI project-by-project	Reusable
		5. Process flow chart on how to secure permission for personal (non sensitive) and sensitive data sharing and use (e.g. develop project brief, submit to information manager for consideration and support, clear with data owner, escalate if refused). Will need to be developed alongside information managers current work to align to a single, Tri-borough information security policy/risk assessment model.	Promote consistency of decision-making.	BI Pilot relevant, but could be made generic for Tri-borough use if demand	Reusable
Data collection and use – sensitive data	Must fulfil Principles 1 and 2 and legal condition of use in Schedule 2 and 3 of Data Protection Act. Project scope and outline plan that clearly states: - Purpose of using the data - Type of data needed and why this data in particular - Outcome of the project – what action is to be taken, and if negative impacts for service users, how impacts will be mitigated - Whether the data can or will be masked, and how - If proposing masking is not possible, evidence why not	**6. Tri-borough PIA template,** potentially a specific version for BI	Promote consistency of decision-making.	Tri-borough or BI Pilot specific if useful	Reusable

Element	*What needed to demonstrate compliance*	*Suggested processes or documents to be developed*	*Benefits*	*BI Pilot only or wider Tri-borough?*	*Project-by-project, or reusable?*
Data sharing with third parties	Information Sharing Agreement or clause in contract/SLA/KPI/Non-Disclosure Agreement that covers information sharing Tri-borough sharing: - There is an existing Tri-borough Section 113 information sharing protocol covering the three Councils which should be referenced and used ISP or NDA only to be created if confirmed existing ISA or contract clause not sufficient.	**7. Tri-borough Operational Information Sharing Agreement** available and accessible	Users aware of and able to access this when setting up Tri-borough data sharing	Wider Tri-borough	Reusable
		8. Published register of existing tri/bi/mono borough partner contracts that already contain a sufficient information sharing protocol (e.g. with NHS, Agilisys, etc.)	Users are of and able to access when setting up partnership data sharing, saving effort and time Minimise Information Manager workload	Wider Tri-borough	Reusable
		9. Tri-borough Information Sharing Protocol or Non-Disclosure Agreement template For use only when information sharing not covered by existing and current information sharing arrangements either as distinct agreements or existing clauses and KPIs in SLA or contract.	Users able to ensure all elements have been covered when needing to set up new agreement. Minimise Information Manager workload	Wider Tri-borough	Reusable
Assurance of technical capability and security Using identifiers with data masking	Statement that sets out: - Who has access to the data warehouse, and what controls are in place to manage access in general and to specific 'walled' sections if applicable - How staff who have	**10. Tri-borough technical compliance standards** for data management systems that details data protection and compliance measures for masking data and tracking data identifiers Will need to be developed alongside information managers current work to align to a single, Tri-borough policy and in consultation with all three data security reps.	Promote consistency of decision making Minimise Information Manager workload Support data sharing requests and inform risk management decisions	Wider Tri-borough	Reusable

	access to sensitive data have been trained, CRB checked, etc. - What technical controls and security protocols are in place and how these are maintained - Contingency/procedures for dealing with any breach should it occur - Assurance on how tech is able to mask data and ensure masking carries through all stages of data processing - Assurance that have used masked identifiers wherever possible	11. Statement that provides details of how **the Business Intelligence Pilot's technical systems** meet all of the components needed to demonstrate compliance Proposed Data Warehouse Controls (to be more fully scoped with technical, information security teams): - Microsoft BI Enterprise Security measures. - Separate data matching and data analysis areas to ensure that personal and sensitive data sets are never combined. - Establish permissible record formats for key record types (e.g. Resident, Property, Business) to maximise scope for analysis, minimise information governance overhead and to eliminate information processing and usage risks. - Role-based access controls to restrict user access to specific reports or subsets of data (e.g. only records associated with a specific team, service or ward). - Audit logs to track user access and usage of information.	Minimise BI project team workload Provide robust assurance to data owners and support decision-making when data sharing requests escalated	BI Pilot only	Reusable
Data and record retention and storage	Record of how long each record can be retained for in the data warehouse and assurance that a system is in place to manage this	**12. A retention and disposal mechanism for the data and records stored in data warehouse** that logs how long each record can be retained and flags records to be destroyed or retention re-negotiated. Data from business will be processed in the data warehouse to create records. Data is then destroyed and the records retained for a pre-defined period of time assessed on a project-by-project basis.		BI Pilot only	Reusable system Needs to be done again with each project

6 BI Information Governance – Outline diagram action plan



Appendix A

Workshop 1 attendees

Name	***Position***	***Borough***
Ciara Shimidzu	Information Manager	LBHF
Fatima Zohra	Information Manager	WCC
Liz Man	Information Manager	RBKC
Kate Singleton	CHS Caldicott Guardian	Tri-borough CHS
Alison Painter	CHS	Tri-borough CHS
Damian Highwood	Data Analyst	WCC
Lee Fitzjohn	Data Analyst	LBHF
Simon Jones	Business Intelligence Business Owner	LBHF
Manisha Patel	Tri-borough Analysis and Customer Feedback Manager	Tri-borough ASC
Haydn Durrant	Business Intelligence Project Manager	Tri-borough
Caeli Christianson	Workshop Facilitator (ICM)	Tri-borough
Beth Gray	Workshop Facilitator (ICM)	Tri-borough

Workshop 2 attendees

Name	***Position***	***Borough***
Ciara Shimidzu	Information Manager	LBHF
Fatima Zohra	Information Manager	WCC
Damian Highwood	Data Analyst	WCC
Lee Fitzjohn	Data Analyst	LBHF
Simon Jones	Business Intelligence Business Owner	LBHF
Manisha Patel	Tri-borough Analysis and Customer Feedback Manager	Tri-borough ASC
Haydn Durrant	Business Intelligence Project Manager	Tri-borough
Caeli Christianson	Workshop Facilitator (ICM)	Tri-borough

Commented on drafts

Name	***Position***	***Borough***
Haydn Durrant	Business Intelligence Project Manager	Tri-borough
Matthew Castle	Business Intelligence - Change Consultant	Tri-borough
Lee Fitzjohn	Data Analyst	LBHF
Simon Jones	Business Intelligence Business Owner	LBHF
Ciara Shimidzu	Information Manager	LBHF
Fatima Zohra	Information Manager	WCC
Liz Man	Information Manager	RBKC
Jo Lodge	Business Intelligence Team Leader	Tri-borough

Appendix B

Key terminology

Data

Information

Information Sharing

Information Usage

Record