



Comisiynydd Pobl Hŷn Cymru
Older People's Commissioner for Wales

INFORMATION MANAGEMENT POLICY

Version	6.0
Review Date	July 2021
Reviewed	July 2020
Responsible Manager	Chief Operating Officer

Information Management Policy

Background

Information resources, regardless of where they are held, are a corporate resource and are therefore the property of the Older People's Commissioner and not the property of individuals. The information gathered in the course of the Commissioner's work is an important resource that informs the development of the strategic priorities and work programme.

The Commissioner processes information in order to carry out her statutory functions. This may include confidential information about individuals including staff and members of the public.

The Commissioner for Older People (Wales) Act 2006 lays out the Commissioner's responsibilities to the information gathered in the course of her work, how and with whom the Commissioner may share that information.

The Commissioner's use of information will be monitored and regularly reviewed including any disclosures, information requests, breaches or complaints received that relate to the use of information. IT systems will be used to facilitate the management of information.

Management of information resources is informed by current best practice guidelines.

This policy applies to all information, information systems, networks and applications of the Commissioner or supplier under contract to the Commissioner.

Procedures

This policy is supported by detailed procedures and sets out the Commissioner's approach to handling information to facilitate the delivery of the Commissioner's objectives. Implementation of this policy will support compliance with the legal requirements of the Data Protection legislation and the Freedom of Information Act 2000.

The Commissioner has in place policies and procedures to protect the information in her control – as set out in Appendix 1.

Principles and approach

The Commissioner has a comprehensive system of integrated policies and procedures in respect of information that will enable her to:

- ensure the free flow of information across the organisation which will actively promote transparency and openness and support and inform decision making.
- conduct daily business efficiently and effectively.
- provide timely access to accurate, meaningful and appropriate information and deal with information requests promptly and helpfully.
- comply with the requirements of prevailing legislation.
- allow staff to have access to information for the effective performance of their role.
- protect information appropriately.

Roles and responsibilities

Overall responsibility for information management arrangements resides with the Commissioner and is discharged through the Chief Operating Officer. Advice may be sought from or provided by the Data Protection Officer from time to time as required.

The Head of Finance and Resources has day to day responsibility for ensuring security, accessibility and integrity of electronic data and for secure storage of hard copy data.

Information Security

Information concerning enquiries is recognised as being particularly sensitive and the security of this information is of paramount importance. This also applies to personal information held about the Commissioner's staff. Information is also a valuable asset for the Commissioner and business continuity is dependent on its integrity and continued availability.

The Commissioner is committed to the secure use of information and information technology systems in order to protect the availability, integrity and confidentiality of information in her control. The Commissioner implements such security measures as she deems appropriate to ensure that personal information is effectively protected from unauthorised use, modification, disclosure or destruction, whether accidental or intentional.

The Commissioner uses a risk based approach when assessing and understanding the threats to security. She uses physical, personnel, technical and procedural means to achieve appropriate security measures. She takes into account developments in technology and the cost of implementation in order to achieve a level of security appropriate to the nature of the information and the harm which may result from a security breach.

Information Sharing

The Commissioner, where practicable, will enter into information sharing agreements with other organisations where it is most likely that information will need to be shared on a regular basis.

Appendix 2 set outs the form that should be completed when sharing information with external parties. Prior to finalising this form, advice should be sought from the Data Protection Officer as to the purpose of the data sharing to ensure compliance with the data protection principles. The Chief Operating Officer should authorise this form and share a copy with the Data Protection Officer. The Data Protection Officer shall maintain a log of all data sharing agreements in place and the terms which govern such arrangements.

Advice on the secure transfer of data should be sought in advance from the Data Protection Officer e.g. encryption and/or password protected memory sticks.

Staff Awareness

All staff are made aware through induction, training and policy updates, of their responsibilities to manage information appropriately.

All staff shall comply with information management procedures including the maintenance of data confidentiality and data integrity. Failure to do so may result in disciplinary action.

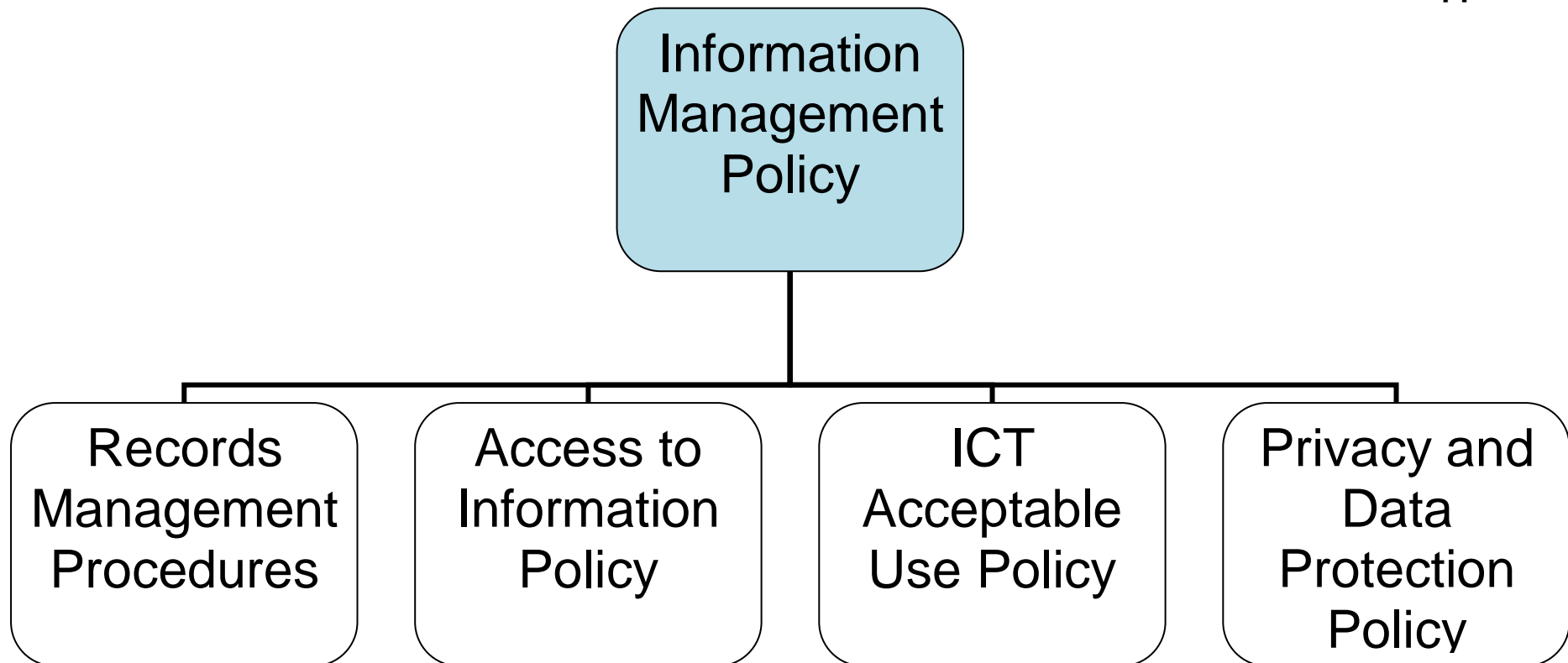
All contracts of employment contain a confidentiality clause.

Information management awareness training is included in the staff induction process. An on-going awareness programme is maintained in order to ensure that staff awareness is refreshed and updated as necessary.

The Data Protection Officer will monitor the staff awareness programme and training attendance.

Related Policies

Privacy and Data Protection Policy
Records Management Procedures
ICT Acceptable Use Policy
Access to Information Policy



Appendix 2

Information Sharing Agreement between:

Older People's Commissioner for Wales and XXXXXXXXX

1.0 Name of information owner

2.0 What information is shared? Does it include personal data?

3.0 What is the business reason for sharing this information? If personal data is being shared, is it necessary to share information to achieve the required purpose and if so, what is the lawful basis for doing so?

4.0 When and how often is the information to be shared?

5.0 What media is used for transferring the data (format and method)?

6.0 How is the information to be stored and protectively marked?

7.0 Who will handle the data? Please state the authorised users.

8.0 How long will the data be held i.e. Retention period?

9.0 What is the destruction process?

How will the information be destroyed when no longer required?
(E.g. shredding) Please give details.

For the purposes of allowing the exchange of information for business reasons, whilst ensuring that the information is exchanged and transferred in a safe and secure manner, in order to protect privacy and confidentiality at all times, the undersigned agree to adhere to the arrangements stated above and if appropriate in the relevant Communication and Information Sharing Agreement.

On behalf of XXXXXXXX

Name: _____

Signed by: _____ Date: _____

On behalf of Older People's Commissioner for Wales:

Name: _____

Signed by: _____ Date: _____