

INFORMATION GOVERNANCE FRAMEWORK

Organisation	Leeds Beckett University
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INTRODUCTION

Information as a strategic asset

1. Information is a vital asset for all aspects of the University's operation and for the efficient management of the University's resources. As well as protecting and providing the rights of access to public and personal information, it plays an increasingly strategic role in the way in which the University is regulated and held accountable by external bodies. Insight and intelligence gathering from our data is key to understanding our institutional position and performance. It plays a key role in the management and governance of the University and its future planning.
2. Information governance is concerned with how information is held, obtained, recorded, used and shared by an organisation. Information is used here as a collective term to cover terms such as data, documents, records and content. It is essential that the University has a robust information governance management framework, to ensure that information is effectively managed using the appropriate resources and documented policies, processes and procedures, staff training and the necessary management and accountability structures.

Purpose

3. This Framework establishes and sets out the roles and responsibilities associated with the management of the University's information, data and system assets.

Audience

4. This Framework applies to all staff the University and its partner organisations that, by agreement, have responsibility for any aspects of University information collection, maintenance or disposal.

Scope

5. The Framework relates to institutional or management data across but not limited to the following domains:
 - Student data
 - Staff data
 - Research data
 - Learning resource data
 - Enterprise and community engagement data
 - Business data
 - Finance data
 - Space and asset data

Definitions

6. Data are facts and statistics collected together for reference or analysis. When data is processed, organised, structured or presented in a way that gives it context and therefore makes it more useful, it is called information. In the context of this document and the University's Information Governance framework, the terms data and information can be used interchangeably.

THE INFORMATION GOVERNANCE FRAMEWORK

7. The Information Governance Framework sets out how Leeds Beckett University manages the capture, creation, access, security, management and sharing of its information both internally and externally.
8. The Framework has been developed based on best practice models adopted nationally. It is structured around the following five key strands of activity:
 - Oversight and management of the Information Governance Framework
 - Records and Information Management
 - Information Legislation Compliance
 - Information Security and Cyber Security
 - Data Quality & Assurance
9. A summary of each strand and what will be delivered through the adoption of this Framework is provided, alongside the supporting policies and procedures that will enable the framework to be implemented across the University.

Information Governance - Roles and Responsibilities

10. The table below sets out the key roles and responsibilities relating to information governance throughout the management structures of the University. An overview diagram is attached at Appendix 1 and reporting structures Appendix 2.

Role	Responsibilities	Role Holder
University Executive Team (UET)	<p>Key role in fostering the information governance culture within the University and the use of information and data as a strategic asset.</p> <p>In addition:</p> <ul style="list-style-type: none"> • Providing Data Protection compliance assurance to the Board of Governors. • Receiving assurance and reports in relation to organisational compliance. • Enabling the DPO to perform their statutory requirements and is provided with the necessary time, resources and support. • Ensuring the DPO is involved as required in all issues which relate to the protection of personal data. 	<p>UET members</p> <p>UET through the University Secretary</p>

Role	Responsibilities	Role Holder
Senior Information Risk Owners (SIROs)	<p>Senior management with overall responsibility for the use of information as a strategic asset in their School or Service area:</p> <ul style="list-style-type: none"> • Providing accountability and assurance to UET that information governance framework policies, including data protection, access to information and information security policies are complied with in their areas. • Management of responses to any data protection breaches. • Enabling the DPO to perform their statutory requirements and is provided with the necessary information and support. • Ensuring the DPO is involved as required in all issues which relate to the protection of personal data. 	University Registrar, Deans & Directors
Data Protection Officer	<p>A statutory role which advises on the University's compliance with data protection legislation:</p> <ul style="list-style-type: none"> • Providing advice and recommendations to the SIROs and UET in relation to data protection risks. • Enabling and monitoring compliance with data protection legislation. • Reviewing and periodically reporting on the University's data protection compliance. • Advising the SIROs in relation to the management and response to any personal data breaches. • Being the University's contact with the Information Commissioner's Officer. <p>The DPO role is independent and advisory and does not make decisions on the processing of personal data.</p>	Head of Information Governance
Information Asset Owner	<p>Role ensures that information assets are managed appropriately:</p> <ul style="list-style-type: none"> • Ensuring consistent local information and data management processes are developed, implemented and reviewed. • Monitoring and reporting on information management and compliance as required to UET through Deans & Directors. 	School and Service Heads and Managers nominated by Deans & Directors

Role	Responsibilities	Role Holder
	<ul style="list-style-type: none"> • Role is responsible for data protection privacy compliance in their area and be the point of contact for the Information Compliance Team • Managing data protection risks. 	
Information Asset Stewards/ Administrators	<p>Information Asset Stewards/Administrators ensure that the daily operation of systems and processes are compliant with the Information Governance Framework and related policies and procedures.</p> <p>They take a proactive role in understanding the purpose of the processes they operate and how they contribute to the wider University and undertake required learning and development activities.</p>	Individuals nominated by IAO's
All staff and third parties	<p>All individuals and organisations who process information on behalf of the University have a responsibility, under the necessary agreements, to comply with information governance framework and its policies, including data protection, access to information and information security procedures.</p>	

OVERSIGHT AND MANAGEMENT OF INFORMATION GOVERNANCE

11. This strand of the Framework covers the management of information governance at an institutional, managerial and operational level across the University. It is a fundamental component of the Framework as it will provide the necessary ownership, advocacy and accountability structures that can be used to ensure the appropriate prioritisation and implementation of the information governance framework across the University.
12. The following measures will be implemented to ensure appropriate oversight and management of the University's approach to Information Governance:

REF	Measures
IG 1	Leeds Beckett University has an approved Information Governance Framework.
IG 2	There are clearly defined corporate, managerial and operational stewardship responsibilities for information governance appropriately embedded in role expectations across the University.
IG 3	Leeds Beckett University has a Strategic Information Management Group supported by an Information Management Operations Group with agreed Terms of Reference. These Groups will work within and report to an appropriate place within the University's broader executive advisory group and corporate governance arrangements. (Appendix 2)
IG 4	The Strategic Information Management Group and its Information Management Operations Group have access to the necessary expertise across all areas of the Framework.
IG 5	A corporate information governance improvement plan sets out priorities and objectives and is managed by the Information Management Operations Group and monitored by the Strategic Information Management Group.
IG 6	Leeds Beckett University has an Information Asset Management Training Programme that includes Data Protection and Privacy by Design requirements.
IG 7	Staff induction procedures across the University effectively raise the awareness of information governance and outline individual responsibilities contained therein.
IG 8	An established review process exists to maintain the currency of the Information Governance Framework within the University.

13. The following policies and procedures will support the delivery of the Information Governance Management measures outlined above.

- Leeds Beckett University Information Governance Framework
- Strategic Information Governance Steering Group Terms of Reference
- Information Management Operations Group Terms of Reference
- Corporate Information Governance Improvement Plan
- Leeds Beckett University Information Asset Management Training Programme
- Information Governance Training Needs Assessment and Training Plan
- Information Governance & Security – Staff guidance materials

RECORDS AND INFORMATION MANAGEMENT

14. Records and Information Management covers the process of creating, describing, using, storing, archiving and disposing of organisational records according to a defined set of standards (usually adherence to ISO 15489). It is a fundamental component of the Information Governance Framework as it ensures the University's record sets enable adherence to compliance rules and statutory access requirements as well as protecting the University's corporate memory.
15. The following measures will ensure the delivery of an appropriate Records Management function:

REF	Measure
RM 1	Leeds Beckett University has an ISO 15489 equivalent Records Management Policy.
RM 2	Leeds Beckett University has an agreed and implemented Records Retention Schedule.
RM 3	Leeds Beckett University has agreed and implemented Information Management and Security Policy that include security & access measures and controls.
RM 4	Leeds Beckett University has documented procedures to ensure delivery of the Records Management Policy. As a minimum, these should cover: <ul style="list-style-type: none"> • Storage and Handling • Business Continuity • Access, Retrieval and Disposal
RM 5	Leeds Beckett University has deployed appropriate systems and tools to efficiently manage the University's records in line with the Records Management Policy.
RM 6	A Controlled Business Vocabulary (or taxonomy) is developed and embedded within electronic document and records management processes.
RM 7	Leeds Beckett University has a Records Manager that has the required capacity and skills to develop and support the implementation and embedding of the Records Management Policy.
RM 8	Core Records Management competencies are built into appropriate role expectations and a suitable training and development programme established to facilitate their delivery.
RM 9	Leeds Beckett University has agreed and implemented an Information Classification Scheme which incorporates security (access and permission) rules.

16. The following policies and procedures will support the delivery of the Records Management measures outlined above.
- Records Management Policy
 - Records Retention Schedule
 - Guidance on Records Management
 - Information Classification Scheme

INFORMATION LEGISLATION COMPLIANCE

17. Information Compliance covers the legal framework and the standards that need to be established to ensure the University’s management of information operates within the law and the rights of individuals.

18. The University manages and processes large volumes of confidential and sensitive information about people. It must deal with this lawfully and ethically. Failure to do so could cause harm and distress to individuals and cause reputational damage and increased risk of litigation or regulatory action. The key legislation the University must comply with includes the General Data Protection Regulation, Data Protection Act, the Freedom of Information Act and the Human Rights Act.

19. The following measures will support the delivery of an appropriate Information Rights & Compliance function:

REF	Measures
IC 1	Leeds Beckett University has an approved and monitored Access to Information Policies that sets out University procedures, roles and responsibilities.
IC 2	Schools and Services have nominated staff responsible for supporting Access to Information requests.
IC 3	Leeds Beckett University has a corporate framework for evaluating the public interest test for disclosing information through Access to Information requests in a consistent and transparent manner.
IC 4	All staff are aware of the various rights of access to information and how these can be exercised inclusively.
IC 5	The public is made aware of their information rights under Data Protection and Freedom of Information and how to exercise them.
IC 6	Staff ensure that information is provided in the most appropriately accessible format within statutory timescales.
IC 7	Leeds Beckett University has an effective mechanism in place to consider appeals to withhold information under information law.
IC 8	Leeds Beckett University has an approved and monitored Data Protection Policy compliant with data protection principles and statutory requirements.

20. The following policies and procedures support the delivery of the information compliance measures outlined above.

- Data Protection Policy
- Access to Information Policy
- Publication Scheme
- Staff guidance on Data Protection and Freedom of Information Act (FOIA)
- Guidance on Data Protection Impact Assessments
- Information Asset Management Programme

DATA QUALITY AND ASSURANCE

21. This strand of the Framework covers the need to ensure the quality, accuracy, and reliability of our data and internal information. It is a fundamental component of the Information Governance Framework as, staff, students and key stakeholders need to be able to trust the validity and authority of corporate information sources and have confidence that it is up-to-date and accurate.
22. It is important that the University can assess the quality of its data as a strategic asset and business intelligence tool and ensures that all data returns comply with the necessary statutory and regulatory requirements and standards.
23. The following measures will support the delivery and assurance of data quality across the various areas of the University with responsibility for data quality and data returns:

REF	Measures
DQ 1	Leeds Beckett University has a commitment to data quality and a designated data lead at executive level.
DQ 2	Leeds Beckett University has a Data Quality Management Policy implemented across Schools and Services.
DQ 3	There are designated data stewardship roles with specific responsibility for data quality across the University.
DQ 4	Standards are set through processes and procedures to ensure the quality of data being shared with external organisations.
DQ 5	There are documented procedures and processes in place governing the capturing, recording and handling of data.
DQ 6	There are documented procedures for data collection activities and these procedures are monitored.
DQ 7	Data quality checks are incorporated into processes and procedures around the handling of data.
DQ 8	There are business continuity plans in place for all systems.

24. The following policies and procedures support the delivery of the data quality assurance measures outlined above:
- Data Quality Management Policy
 - Data Quality and Auditing Procedures
 - Records Retention Schedule
 - Business Continuity Plans

INFORMATION SECURITY AND CYBER SECURITY

25. Information security covers the policies and procedures in place to protect information and information systems from unauthorised access, use, disclosure, disruption, modification, or destruction. It is one of the fundamental components of the Information Governance Framework as it will ensure the University is able to protect the confidentiality, integrity and availability of information within the organisation, that includes cyber security resilience.

26. The following measures will support the delivery of an effective and robust Information Security function:

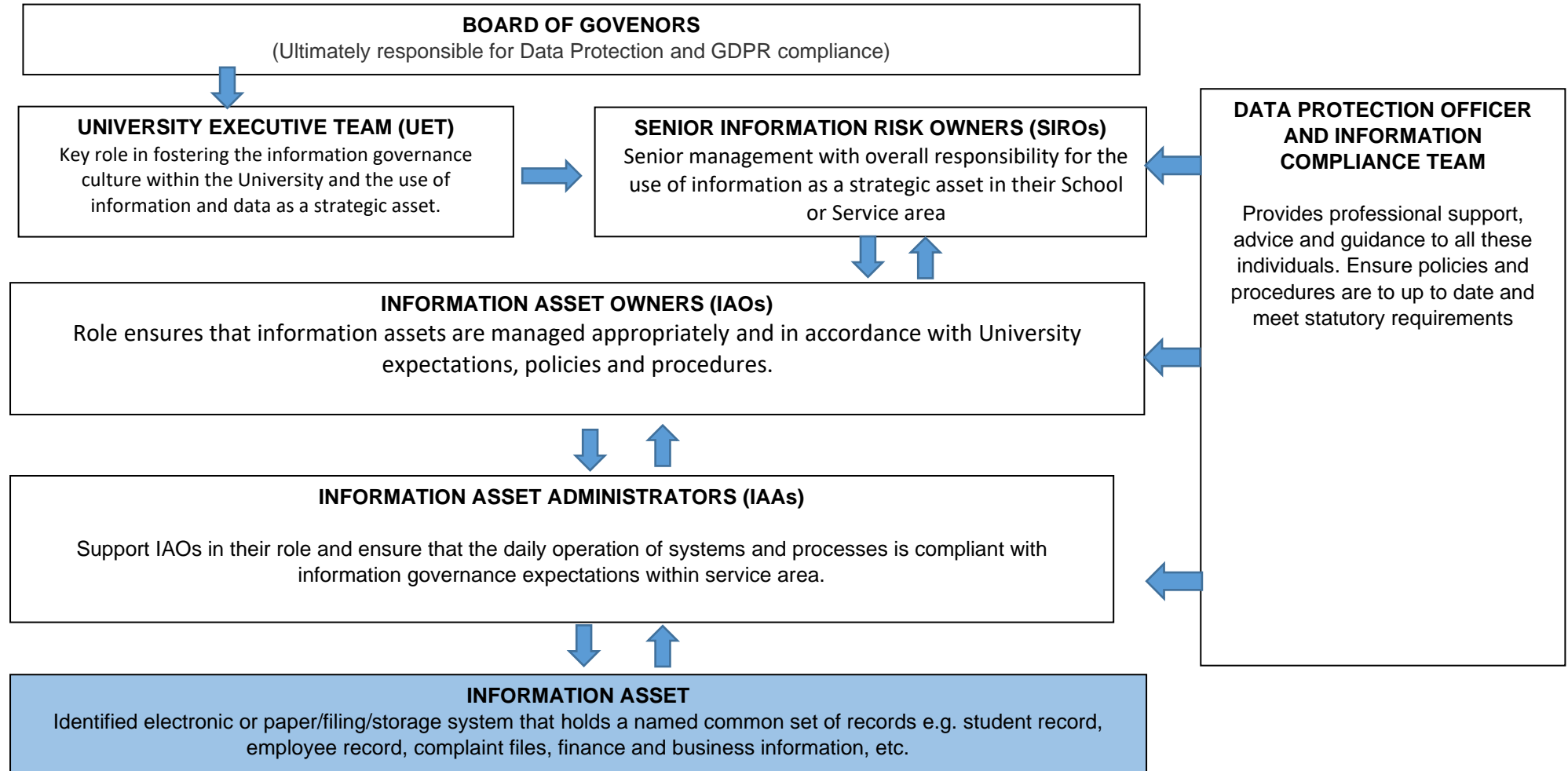
REF	Measures
IS 1	There is an Information Management and Security Policy in place based on ISO 270001
IS 2	Roles and responsibilities for adherence to the policy are clearly defined and an appropriate training programme is in place.
IS 3	There is an inventory of information assets as required for compliance with data protection principles.
IS 4	Access control is in line with the security policy and the need for information dissemination and authorisation
IS 5	A Corporate Risk Management & Assurance Framework is in place and information security risks are incorporated.
IS 6	Security requirements are included in formal system acquisition, development and maintenance procedures along with Data Protection Impact Assessments where required.
IS 7	There are procedures to report information security incidents and weaknesses and to escalate action on dealing with these. Staff are made fully aware of the procedures.
IS 8	There is a business continuity management process designed to limit the impact of and recover from the loss of information assets.
IS 9	All changes to information processes are planned and implementation is effectively managed including the use of Data Protection Impact Assessments.
IS 10	There are controls in place for managing third party data sharing agreements
IS 11	Networks are adequately managed and controlled to protect them from information and cyber security threats. Security is provided for the systems and applications using the network.

27. The following policies and procedures support the delivery of the University's Information Security measures outlined above:

- Information Management and Security Policy
- IT Security Policy
- IT for New Starters Manual
- Bring Your Own Device Policy
- Computer Protection Policy
- Cryptography Policy
- Information Handling Policy
- Network Management Policy
- Software Management Policy
- System Planning & Management Policy
- User Management Policy
- Use of Computers Policy
- Wireless Communication Policy
- Mobile Computing Policy

Appendix 1

Roles and responsibilities for the management and governance of Information Assets within Leeds Beckett University



Information Governance Framework – Oversight & Operations Groups

Group	Description	Membership
Strategic Information Management Group	Responsible for overseeing a University wide Information Governance Framework that supports effective information management - planning, developing and maintaining policies, standards, procedures and guidance, coordinating information governance activity across the University	University Secretary (Chair), SIROs, IAOs of systems that process personal information
Information Management Operations Group	Operational arm of SIMG, tasked with the development and implementation of policies and processes. Provides professional guidance on best practice regarding the lifecycle for the creation, collection, curation, security and governance, access or usage, disposal or retention and preservation, of any records, information and data assets required and managed by the University. this group brings together data, records, information and security specialists from across the University	Head of Information Governance, IT Security Manager, Records Manager, Schools and Service representative responsible for key aspects of University data, records and information
Task and Finish Groups	Groups of Information Asset Stewards / Administrators established, as required, to work collaboratively on specific data and information processes to apply University and regulatory requirements, standards of best practice and adapt them for local implementation in their operational areas.	As nominated by Deans & Directors