



Llywodraeth Cymru
Welsh Government

Welsh Government Information Management and Governance Policy

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Policy Owner: Permanent Secretary

Description: This policy defines the way Welsh Government information and records should be managed to standards which ensure that vital and important records are identified, that the Welsh Government holds records that are necessary, sufficient, timely, reliable and consistent with operational need, and that legal and regulatory obligations are met. It also defines the roles and responsibilities for the creation, safekeeping, assurance, use, re-use, storing, sharing, publishing and disposition of information.

Publication: This policy is located on the Welsh Government Intranet and at <http://gov.wales/about/foi/policies/recordsmanagement/?lang=en>

This policy replaces the Welsh Government Information and Records Management Policy of May 2015.

Welsh Government Information Management and Governance Policy

The Permanent Secretary and her Senior Team recognise information management as a specific core corporate function and ensure the necessary levels of organisational support to enable its effectiveness. The programme brings together responsibilities for information, data and records as corporate assets, in all formats, throughout their life cycle from creation or receipt through to disposal (destruction or archiving).

To comply with the Public Records Act 1958 and other information management legislation, the Welsh Government needs to know what information it possesses, how old it is and to ensure that it constitutes reliable evidence. For sensitive information, including that covered by the General Data Protection Regulation (GDPR) (EU) 2016/679, the Data Protection Act 2018 & Law Enforcement Directive (LED) 2018, we must be able to allow access to those who need to see this information while preventing others from gaining access. We also need to be able to identify personal information, know who it is shared with, and dispose of information we are no longer entitled to hold.

SUMMARY STATEMENT

This policy statement sets out the commitment of the Welsh Government to manage information in a professional manner, to ensure that its information base is efficiently exploited, whilst providing accountability and assurance. It is supported by a framework of more detailed data, information and records, and security policies.

The Welsh Government uses an eight stage Information Lifecycle: Create, Assure, Use, Store, Access, Share, Publish and Dispose.

Create

The policy defines how the Welsh Government applies good information management principles to information (data, documents or records) created or received as part of its activities.

Our policy is to:

- assign a meaningful title in a consistent format to all information, so that its content is clear and it indicates when a file contains personal data
- ensure the correct retention (Information Type) is applied at creation
- apply version control (documents created and stored on systems other than our corporate EDRMS, iShare) so the latest version can be easily identified, and whether it is a draft or published version
- apply sufficient metadata to aid retrieval and to provide context ('who', 'when', 'why' etc.)
- label information with appropriate protective markings, in accordance with current Security policy and guidance.

Assure

The policy defines how the Welsh Government assures information (including personal information), and the systems and processes used, so that it is

appropriately protected whilst also being fully utilised for maximum benefit to the organisation.

Our policy is to:

- assess and manage risks to the confidentiality, integrity and availability of information throughout the information lifecycle
- balance the need to protect information with the need to effectively make use of it
- develop a risk-aware culture
- take measures to protect information from inadvertent or unauthorised access, alteration, transmission or destruction
- comply with legislative and mandatory requirements relating to the protection or destruction of information
- appoint appropriately qualified individuals to roles with clearly defined responsibilities for information assurance
- ensure the privacy of users and protect personal data
- ensure we have the powers and a valid lawful basis to process personal data
- maintain Information Asset Registers (IARs)
- ensure that contracts, grants, Memorandums of Understanding (MOUs) and other third party arrangements are up to date and properly cover any processing of personal data
- ensure that all privacy notices are up to date
- undertake appropriate Privacy Impact Assessments (PIAs) and Data Protection Impact Assessments
- ensure privacy by design¹ when undertaking ICT procurements
- report information security incidents (including data breaches) to the Departmental Security Unit (DSU) as soon as we are aware of them and where appropriate notify the Information Commissioner within 72 hours
- ensure that all staff are aware of their responsibilities regarding information, its management and use

Our [SIRO Risk Appetite Statement](#) defines at a practical level how the Welsh Government protects its information assets. Our [Information Security policy](#) sets out the approach to ensure our information assets are properly protected against a variety of threats (such as error, fraud, sabotage, terrorism etc.).

Use

The policy defines how the Welsh Government uses systems (including manual systems) to create, store or process information, taking account of privacy and sensitivity requirements and statutory obligations.

Our policy is to:

- manage the systems used to create, store or process information as corporate resources
- fully exploit information and systems by sharing, reusing and repurposing wherever possible and appropriate

¹ Privacy by Design holds that organisations need to consider privacy at the initial design stages and throughout the complete development process of new products, processes or services that involve processing personal data.

- consider privacy and sensitivity issues when using information and systems, and comply with mandatory requirements and statutory limitations
- ensure all staff are aware of their responsibilities for the management and use of information and systems
- where necessary implement appropriate technical controls (including monitoring)
- ensure that the necessary authority to process, collect, and share personal data are in place
- ensure the transparency of government data, making this available for re-use by third parties (including the public) by publishing in reusable form
- use licensing arrangements, in accordance with Public Sector Information regulations, to encourage the re-use of government data

Store

The policy defines how and where the Welsh Government stores business information to maximise efficiency, reduce costs, enable sharing, and minimise risks.

Our policy is to:

- correctly store information, regardless of format / medium, on an approved system (e.g. iShare, CaSSi and IRIS) using a recognised file plan
- store personal data in an appropriate area with the right authorisations and access controls
- store physical information in registered files, but only when it is impossible to create a valid electronic version
- not store information permanently on removable media (e.g. CD-ROM, DVD) as these may degrade over time and are less secure
- not store business information in formats which are likely to be unsupported long-term, and migrate information when formats do change
- restrict the size of “individual” storage areas, iShare personal home areas, desktop areas and Outlook mailboxes so that they are sufficient for short term use
- apply and maintain a corporate Retention Schedule
- store information on accredited systems or in areas appropriate to the protective marking
- minimise the amount of personal data required and only keep that which is absolutely necessary
- do not keep contact lists beyond the stated retention period, or use them for anything other than their original purpose.

Access

The policy defines how Welsh Government information is to be made accessible to all those with a business need to see it, both internally and externally. Information will remain accessible and findable for as long as it is needed, and will be preserved permanently where appropriate.

Our policy is to:

- only limit access to information when necessary due to security, privacy or sensitivity requirements

- apply access controls to protect information, including personal information, which should not be generally accessible
- use a corporate taxonomy to index documents for improved retrieval by search engines
- identify information which is vital to essential core functions, which must be restored promptly in the event of a disaster
- check that information is presented in compliance with the Disability Discrimination Act

Share

The policy defines how the Welsh Government shares information (internally, with third parties and with the public) to ensure it is available for re-use, to encourage openness, and to comply with legal requirements (e.g. Freedom of Information Act 2000, the General Data Protection Regulation (GDPR), Data Protection Act 2018, Environmental Information Regulations, Re-use of Public Sector Information Regulations 2015, and Copyright Act 1988).

Our policy is to:

- manage all business information as a shared resource within the Welsh Government, with access only limited when there are security, privacy or sensitivity requirements.
- send iShare links internally rather than reproducing or sending attachments in emails
- where possible, use iShare Connect, Egress, etc. when sharing information with colleagues outside the Welsh Government
- ensure that documents shared with third parties do not contain comments, tracked changes, or similar 'hidden' content. In the rare circumstances where documents with comments are to be shared, permission from the relevant IAO must be obtained
- recognise and protect Intellectual Property Rights when appropriate
- comply with the statutory access provisions of the Freedom of Information Act, the GDPR, Data Protection Act 2018, Environmental Information Regulations (EIR) and Public Sector Information Regulations (RPSI)
- proactively make information available to the public in accordance with the Welsh Government publication scheme
- share only the minimum of personal data required to meet business purposes, and do so in a secure manner compliant with relevant legislation

Publish

The policy defines how the Welsh Government publishes information externally, ensures it is of appropriate quality in terms of content and format, and complies with appropriate standards.

Our policy is to:

- apply a formal review and approval process to information published externally to ensure content does not breach security or sensitivity
- apply copyright statements to all publications
- recognise and protect Intellectual Property Rights
- allocate an ISBN (International Standard Book Number) or ISSN (International Standard Serial Number) as appropriate, to all publications

- use appropriate re-use statements including the Open Government Licence (OGL)
- proactively make information available for third party re-use by publishing in reusable forms and under enabling licensing conditions (in accordance with RPSI)
- comply with legal deposit legislation by providing a copy of all works published (in whatever format) to the British Library and the National Library of Wales within a month of publication
- apply corporate identity standards to all publications.

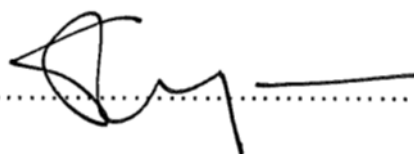
Dispose

The policy defines how the Welsh Government disposes of its information. Disposal is the final stage of the Information Lifecycle when information is given a further review date, transferred to The National Archives for permanent preservation, or destroyed.

Our policy is to:

- consider the 'whole-of-life' disposition of information at the time of its creation
- only retain information for as long as there is a business or regulatory need, and protect still-sensitive information.
- delete personal information that is no longer required in accordance with the retention statement in the relevant privacy notice
- apply retention and disposal schedules to all information held in shared corporate repositories
- comply with the requirements of the Public Records Act and Freedom of Information Act Section 46
- destroy information securely so that reconstruction or recovery is unlikely.

This policy is effective from: 21 August 2018
 (date of signature)

Signed: 

Shan Morgan
 Permanent Secretary
 Welsh Government