Llywodraeth Cymru
Welsh Government

Rheoli Hysbysrwydd, Gwybodaeth a Chofnodion

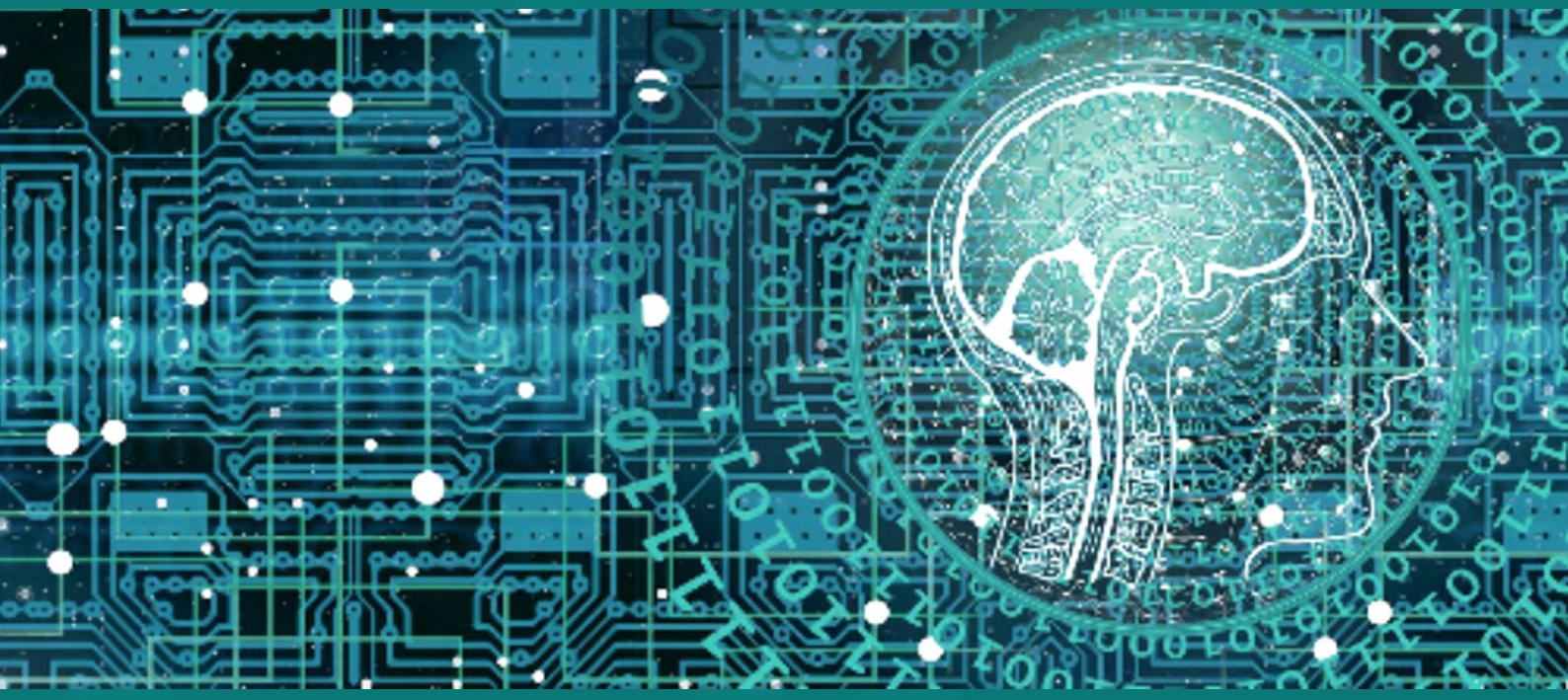
Knowledge, Information and Records Management

Information Management and Governance Policy

Summary Document

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Description: The aim of the Information Management and Governance policy is to define the roles and responsibilities for the creation, safekeeping, assurance, use, re-use, storing, sharing, publishing and disposition of information.

This summary document does not replace the main policy, but provides a summary to be published externally in the interests of openness and transparency in Government.

The scope of the Information Management and Governance policy is all information created during the delivery of Welsh Government objectives, and it applies to all personnel carrying out work on behalf of the organisation. This includes permanent and temporary employees, secondees, consultants, suppliers, partners, contractors and subcontractors. It applies to all personnel regardless of location, including overseas offices.

The policy outlines our information obligations under the Public Records Act and Section 46 of the Freedom of Information Act. It highlights our responsibilities regarding sensitive information, including that covered by the Data Protection Act 2018 (replacing the Data Protection Act of 1998 and incorporating all clauses from the EU-GDPR) and Law Enforcement Directive (LED) 2018.

Publication: The full Information Management and Governance policy is located on the Welsh Government Intranet and internal recordkeeping system.

This summary document is for external publication only.

Staff should refer to the full policy which is only accessible to Welsh Government employees.

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Introduction

1. Why do we need an Information Management and Governance Policy?

Recordkeeping is a requirement under the Civil Service Code. We must "keep accurate official records and handle information as openly as possible within the legal framework"[1].

Good information management ensures that:

- information is available to us and our colleagues when we need it. Whether that be desk instructions, day-to-day procedures, or being able to refer back to (and justify) decisions on policy. The availability and re-usability of our information depends on it being managed appropriately.
- we maintain the corporate memory which is essential when delivering evidence-based policy.
- we meet our obligations under Freedom of Information and Data Protection legislation by having policies and procedures in place to manage and retrieve information on demand and ensure correct handling of personal data.
- we meet our obligations under the Public Records Act to dispose of information at the correct time and preserve anything with on-going historical value.

Information management covers information in all formats from texts through to formal Word documents - if it has been created by us for the purposes of Welsh Government business then it forms part of the record. This includes data as many data sets are of long-term historical importance.

Information created by all personnel remains the property of Welsh Government under the terms of Crown Copyright. Re-use of Government information is outlined in the Re-use of Public Sector Information Regulations 2015.

[1] The Civil Service Code applies to all home civil servants who are members of staff of the Welsh Government. Civil Service Code | GOV.WALES

2. Key legislation

Public Records Act 1958 & 1967

Government of Wales Act 1998 & 2006

Data Protection Act 2018 and UK GDPR

Freedom of Information Act 2000 - including the Lord Chancellor's Code of Practice on the Management of Records issued under Section 46

Environmental Information Regulations 2004 (EIR)

The Re-use of Public Sector Information Regulations 2015

Protection of Freedoms Act 2012 (Part 6 Section 102)

Constitutional Reform and Governance Act 2010 (Part 6 Sections 45 & 46)

Copyright, Designs and Patents Act 1988

Video surveillance (including guidance for organisations using CCTV) | ICO

The ISO standards and requirements for information and records management can be found here.

Information management systems and tools

3. Corporate systems and tools

Hardware and IT equipment (laptops, iPads, iPhones, etc.)

All staff are provided with IT equipment. The equipment is connected to the Welsh Government network servers with access to the internet, email and the corporate Electronic Document and Records Management System (EDRMS). Additional software is also installed where required.

Individuals are responsible for the security and safety of the hardware and any information created and stored on these systems.

Hardcopy

Current official records must be in digital format only and held on the EDRMS. Hardcopy documents received by the Welsh Government are scanned and saved to the appropriate file on the EDRMS.

Legacy paper files have been sent for archiving in an off-site records storage facility. These records are retained for the appropriate period (as specified in the Welsh Government's Retention & Disposal Schedule) before being securely destroyed or sent for permanent preservation at the National Archives if they are of historical significance.

Websites and social media

Our websites contain public records. All Welsh Government (and affiliated bodies) websites are archived to provide continued access to key information. The National Archives has an Operational Selection Policy outlining requirements for website archiving.

Archived websites are accessible via the UK Web and the UK Government Web Archive. The web archive includes videos, tweets, and websites dating from 2006 to present.

Microsoft Teams and other collaboration tools

Microsoft Teams is one of the main collaboration tools used across the Welsh Government, and externally. Teams is used for chat, channel posts, whiteboard, as well as for online meetings and calls.

There is additional internal guidance relating to the appropriate use of Teams and other such tools.

Regardless of the tool being used, any information created by Welsh Government forms part of the official record and anything of business value is saved onto the EDRMS.

Phone calls

Formal discussions and business decisions made via a phone or Teams call are summarised in an email or Word document and saved to the EDRMS.

Texts & instant messaging

When using text or other instant messaging on a Welsh Government device, staff are creating "public records". The individual is responsible for extracting and saving business information onto the EDRMS.

The Welsh Government Security Policy prohibits the use of non-corporate communication channels (NCCC), e.g. personal email, WhatsApp etc. on Welsh Government devices. Official business must only be conducted on Welsh Government devices using corporate platforms e.g. email and Teams messaging.

Meetings

Minutes are taken as a formal record of meetings where important business discussions have taken place, or decisions have been made. Meetings held on Teams are treated as any other meeting, with formal minutes being taken and then saved onto the EDRMS.

Transcripts automatically generated by Teams meetings are deleted once formal minutes have been saved onto the EDRMS.

AI (Artificial Intelligence)

The use of AI and its outputs form part of the official record. AI is used in accordance with current Welsh Government guidance, and AI tools are used responsibly and ethically. Guidance provided by the Office for AI must be followed.

When creating AI systems, data protection and privacy must be considered. Copyright will be respected, with permission being sought before using published information not covered by Crown Copyright.

When using large language models (LLM), such as Copilot, ChatGPT etc., all information which forms part of the record is retained and the use of AI in the process is acknowledged.

Third party AI transcription services, e.g. otter.ai are not permitted, and related bots will be ejected from meetings. Transcription will be used to assist notetaking, and notes will be circulated after the meeting.

4. Information management for new systems

Recordkeeping requirements are considered as part of any newly developed and/or implemented system. As well as business need, this is to ensure that legal requirements are met. This includes:

- Access and security – to ensure appropriate protection and permissions
- Retention and disposal, digital continuity and archiving – to ensure information is retained for as long as it is needed and disposed of at the appropriate time
- Audit requirements – particularly where EU funding is involved
- Legal admissibility – to ensure information is acceptable as evidence for audit purposes and in case of inquiry or legal proceedings, and compliance with BSI DISC PD0008.

5. Security classifications

The Welsh Government adopted the HMG Security Classification Policy for all records created from April 2014 onwards.

Most of our information is classified as either OFFICIAL or OFFICIAL-SENSITIVE.

6. Managing email

Emails are automatically deleted from Outlook 12 months after receipt or creation.

If emails form part of a transaction or evidence of business, they are saved onto the EDRMS as soon as possible.

7. Managing records created by Private Offices

Private Offices are the offices of ministers, the Permanent Secretary and other senior public servants (e.g. Director Generals, the Chief Medical Officer, the Chief Nursing Officer, the Chief Scientific Adviser, Agency Chief Executives and Regional Directors).

Private Offices must adhere to the information and records management policies and practices adopted by the Welsh Government.

8. Managing personal information

The Welsh Government's responsibilities are outlined in the data protection principles under Section 35 of the Data Protection Act 2018.

Whilst an individual has the right to request a copy of any information we hold about them under Data Protection and Freedom of Information legislation (a "subject access request"), not all personal information is covered and there are exemptions which mean the Welsh Government may not be obliged to supply information through a subject access request in certain circumstances.

9. Data sharing

Data sharing protocols must be agreed with external organisations in advance. These protocols must specify:

- Who the sharing organisations are
- Legal status of the partnership
- Information to be shared
- Management process for the information and what will happen to it once objectives have been met
- Principles for storage and access to Welsh Government information

The amount and level of shared personal data must be no more than what is needed for processing. This applies equally to other non-personal data.

10. Collaborative working or out-sourcing

Contracts with third parties must include information management procedures and responsibilities. A minimum requirement is that Cyber Essentials has been attained by the company where personal or OFFICIAL-SENSTIVE information is processed.

11. Re-use of Welsh Government publications

Publications catalogue

To comply with the Welsh Government's Publication Scheme (a requirement under the Freedom of Information Act) and the Re-use of Public Sector Information Regulations 2005 (S.I. 2005/1515) we ensure research reports are available and accessible to the public via the external online Publication Catalogue.

Legal Deposit

To comply with the UK's legal deposit legislation, a copy of every Welsh Government print and digital publication[2] must be given to the British Library and the National Library of Wales.

[2] Materials covered by legal deposit include printed books, journals, magazines and newspapers, microfilm, publications on hand-held media such as CD-ROMs, websites and material available via download.

Retention and disposal

12. Retention schedule and disposal process

The Welsh Government retention and disposal schedule | GOV.WALES sets out the recommended retention periods for different types of information in accordance with legal, audit and operational requirements.

Information is only retained for as long as it is needed to support business requirements and/or legal obligations. Once records reach the end of their retention period, they are included in our official Records Disposals exercise.

No records are destroyed outside the formal disposals process.

13. Historical records

In line with the Public Records Act and the Freedom of Information Act (Section 46), we have to transfer historically valuable records by the time they reach twenty years old (known as the 20 Year Rule).

The National Archives is the recognised repository for Wales as well as the UK government.

The selection of records with historical value is conducted by the Archives & Information Management team in accordance with the National Archives' Records Collection Policy and our own Operational Selection Policies.

We can only retain records beyond 20 years with approval from the Advisory Council on National Records and Archives.

14. Preserving our information

To ensure that digital information remains accessible and future-proof, provision has been made as part of the information management process to migrate digital material held on iShare to the most recent versions of software on a regular basis.

Machinery of government changes

Machinery of government changes / transfer of functions

In the event of a Machinery of Government change, the Departmental Records Officer (DRO) must be informed at the earliest opportunity by the project lead to ensure no loss of information or interruption to business continuity. The transfer of information must be included in any legal steps required to implement the change in Machinery of Government process.

Public Inquiries, Reviews and Tribunals

15. Managing records of public inquiries, reviews and tribunals

Inquiries look at how decisions were made, communicated, recorded and implemented. We are obliged under the Inquiries Act 2005 to preserve any potential evidence once an Inquiry is announced.

16. Litigation Hold and Preservation Orders

A litigation hold helps to ensure that the Welsh Government complies with its duty to preserve information in litigation or in connection with an investigation.

Information may be required as evidence for legal purposes meaning that it must be preserved, without anyone destroying or modifying that information in any way.

17. Legal discovery and candour

Legal discovery

The Welsh Government uses an eDiscovery tool to help identify and review information for Public Inquiries, court cases and internal investigations. It is also used to sift through information to identify what needs to be kept and what needs to be deleted, and to ensure compliance with Data Protection legislation.

Candour

As a public authority, the Welsh Government has a “duty of candour”. This means we must give a "true and comprehensive" account of the Welsh Government’s decision-making processes. The duty extends to information which will assist a claimant’s case, and to information which gives rise to additional grounds of challenge.

18. Auditor General for Wales

The Auditor General for Wales (Auditor General) is the statutory auditor and inspector of public sector bodies across Wales. This role has comprehensive statutory rights to access information relating to the bodies under its jurisdiction.

Further information can be found here.

Information management training

19. Mandatory training

There is a mandatory Information Management training course on our corporate training portal for all Welsh Government staff.

All staff must undertake the mandatory training every two years. Those in Inspectorate and Advisory areas must complete it on an annual basis.

Leaving the Welsh Government

20. Managing information when leaving employment

People leaving the Welsh Government are responsible for managing any information they have been working on before departure to ensure that:

- Work can be carried on by a successor, without delay
- Welsh Government can be accountable for their work after they have left
- Welsh Government complies with the Data Protection Act 2018 and Law Enforcement Directive (LED)
- Welsh Government can respond to Freedom of Information and Subject Access Requests accurately and within the legal response times
- Welsh Government does not incur unnecessary expenditure on records storage and staff time sorting out others' records
- No Welsh Government information must be retained by the leaver.