

Information Management Strategy

6 August 2008

Version 1.2

Version History:

Version	Actions	Date	Action Owner
0.3	Draft circulated for comments (MG)	10 March 2008	Nick Tofiluk
0.4	Amendments made and circulated to respondents. Please note: the issue of executive ownership is to be ratified. Contents listing incomplete. Formatting to be revised once agreed.	17 April 2008	Nick Tofiluk
0.5	Amendments made as a result of feedback – forwarded to Steve Rose for observations and information.	6 May 2008	Nick Tofiluk
0.6	Re-drafted by Head of Information Management – revision of document draft hard copy given to Nick Tofiluk.	17 July 2008	Steve Rose
0.7	Sent to Nick Tofiluk for approval to submit to Aug MG+	21 July 2008	Nick Tofiluk
0.8	Amended by Nick Tofiluk and returned to Steve Rose.	23 July 2008	Nick Tofiluk
0.9	Check amendments by NT, further amendments by SR and suggestion by IOR	28 July 2008	Steve Rose
1.0	Changes accepted, final draft to NT for approval and to submit to MG+ by 8 Aug 4.00pm.	28 July 2008	Nick Tofiluk
1.1	Draft circulated to MG+ for consultation ahead of MG+ meeting	1 August 2008	Steve Rose
1.2	Amendments made from MG+ comments. Submitted to MG+ as paper for sign off.	5 August 2008	Steve Rose

1. Summary

1.1. There are significant pressures on the way the Gambling Commission (hereafter referred to as the Commission) manages information.

- The Gambling Commission's corporate plan
- National Intelligence Model (NIM)
- Business Continuity
- Freedom of Information Act (FOIA)
- Data Protection Act (DPA)
- The Hannigan Review (Information Security)
- ISO 27001 Accreditation
- E-government
- Better Enterprise and Regulatory Reform (BERR)
- The Hampton Review (Assessing Regulation)
- Government Protective Marking Scheme
- Whether litigation is active or in contemplation

Pressures on how the Commission manages the information it collects, organises, retrieves, utilises, distributes and destroys.

1.2. The Information Management Strategy (IMS) is based upon the belief that information is a valuable corporate resource having a lifecycle; that must be managed and protected as the other resources (people, money and buildings) of the Commission.

1.3. The delivery of effective information management is dependent upon the Commissions leaders at all levels engaging with the lifecycle stages; creation, organisation, accessibility, management and disposal.

1.4. The IMS sets a clear agenda for how the Commission must manage information across all areas of business and the processes it adopts. The strategy identifies the principles upon which specific information management practices and policies can be implemented.

1.5. An implementation plan for the strategy will be determined once the strategy has been adopted and signed off by the appropriate Commission management group.

2. Introduction

2.1. The Commission has a duty to obtain and use a wide variety of information (including personal information), in order to achieve its goal of keeping gambling safe and fair for all and the strategic objectives contained within the corporate plan.

2.2. This IMS in conjunction with all other information management related policies and procedures, provides a mandate for the performance of all information management functions across the Commission. It also ensures all employees, including agencies; contractors and partners involved with Commission information carry out their duties within the agreed framework. It is the responsibility of the Commission to ensure that the principles of the information management extend to the use of our information beyond solely internal usage.

- 2.3. This strategy will relate to all information assets required for a Commission purpose. The Commission's purpose is defined as:
- Keeping crime out of gambling
 - Ensuring gambling is conducted fairly and openly
 - Protecting children and vulnerable people from being harmed or exploited by gambling
- 2.4. Subsequent implementation will focus on the following:
- Professional service delivery
 - Effective management of information and access to it
 - Effective and lawful use of information
 - Information as a c
 - Commission asset and a shared resource
 - Efficient infrastructure and systems of work (including IT provision)
- 2.5. The IMS sets out the strategic framework within which all information management and security activities will take place. It is the foundation plan as to how the Commission manages all of its information and as such informs, and is informed by, all other Commission policies.

3. Scope of the strategy

- 3.1. The strategy applies to all the information assets within the Commission and applies to information received, created, retained, shared, disseminated, disclosed, maintained, reviewed or disposed of by all employees in the course of carrying out their duties. This covers all formats of information, electronic, digital, hard copy and tacit retained by employees.
- 3.2. The scope of the strategy is a vehicle for the development of an agreed set of principles within which all Commission functions should act in considering information assets.
- 3.3. The strategy does not redefine organisation structures or determine technology based solutions but may inform in these areas. It starts from the presumption that effective and efficient information management is based on employee actions and personal responsibility not technological fixes.
- 3.4. The IMS will not cover information security as a topic in its own right. The principles of security and appropriate usage will be laid out but the detail and progression of Commission plans will be covered by two specific sub-streams of work;
- Business Continuity Management (BS2599)
 - Information Assurance (ISO27001)

4. Strategic aims and objectives

- 4.1. The Commission's aim for information management in discharging its regulatory responsibilities is to ensure that the Commission's decision making¹ is enabled through efficient access to reliable information (and intelligence) at the point of need; where all understand the importance of using information correctly, sharing lawfully and protecting it from improper use.
- 4.2. To achieve its aim the Commission will;
 - ensure that the Commission infrastructure and processes provide the right information to the right people at the right time for the right purpose.
 - achieve compliance with legislation and Commission policies.
 - manage its information securely.
 - identify and support effective practice across all business areas.

5. Roles and responsibilities

- 5.1. There is a personal responsibility for information management that lies with every employee of the Commission. Employees must accept responsibility for their areas of work, appreciate the information cycle and understand the impact of their information management activities can have on other business areas within the Commission. It is the individual responsibility of all to adhere to the principles of information management laid out in this strategy.
- 5.2. There is a significant responsibility for all management within the Commission to provide effective leadership in applying the principles of information management. Managers must recognise that this agenda will bring the need for cultural and business change and must look to provide positive leadership to help employees. This highlights a communications and training need to ensure all managers and employees are trained to understand the roles and responsibilities of information management.
- 5.3. Executive responsibility for the IMS lies with the Director of Operations with the overall delivery being the responsibility of the Head of the Information Management.
- 5.4. The Head of Information Management will;
 - Ensure that the IMS is available for all employees, partners and the public to view.
 - Give guidance for good information management practice and promote compliance with this strategy
 - Lead corporate delivery, implementing the principles of information management.
- 5.5. All individuals within the Commission will ensure that all information created, received and held for which they are responsible, is accurate, relevant and kept up

¹ The definition of decision making within the IMS includes the Commission's transactional business.

to date, and that decisions are properly recorded, thereby ensuring accountability with an accurate audit trail.

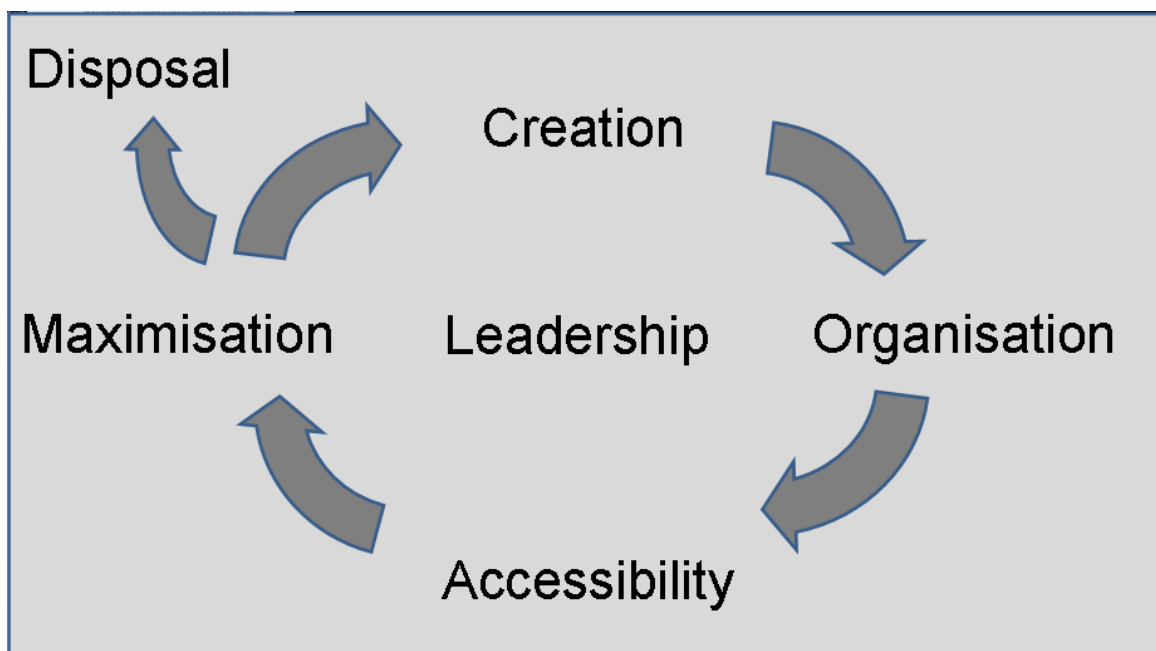
- 5.6. The Commission will engage with others to ensure that they accept their responsibilities to provide information as obliged under law or as agreed by any Information Sharing Protocol (ISP) or Memorandum of Understanding (MOU).

6. Relationship with future policies

- 6.1. The strategy demands that future policies or work streams of the Commission will have due regard to the Commission's strategic approach and adhere to the Commission's principles of information management. The Commission is committed to have due regard to the Information Management strategy when developing other policies.

7. The Strategic Approach

- 7.1. The Commission's strategy will be cyclic in nature and comprise six elements as shown below.



- 7.2. **Creation:** Information from different sources enters the Commission through a variety of systems of work or technology. Systems for capture must be lawful, cost effective in achieving timeliness, meet quality standards and avoid duplication.
- 7.3. The Commission must be clear as to what purpose information is being **captured** for and avoid a collection for an undetermined reason.



- 7.4. **Organisation:** Information captured must be **organised** and stored efficiently. The storage policies and procedures the Commission adopts or develops must ensure that information is **fit for its intended purpose** throughout the information lifecycle.



- 7.5. Robust methods of **quality assurance** will ensure that information is accurate at the earliest point to capture. The Commission must avoid **duplication** of information assets, looking to design storage functions that allow for both security, business continuity and cross function linkage to allow for a '**single version of the truth**'.

- 7.6. **Accessibility:** Information and knowledge within the Commission must not be the preserve of the few but **shared** across the organisation. The Commission must consider the full cycle of information and not work in a compartmentalised way.

- 7.7. Data sharing should be a primary principle in both internal and external contexts. This will allow for a reduction in duplicated effort, a maximisation of opportunities and a broadening of horizons to drive the Commission forward. In considering accessibility the issues of **information security, business continuity and compliance with legislation** must be of paramount importance.



- 7.8. In respect of the FOIA the Commission must start from the principle that **information shall be made available**. The DPA must be adhered to and the primary information management principle will be that the owner of personal information is the subject not the collector and that collecting and storing that information carries an ethical responsibility to safeguard it on behalf of the subject.
- 7.9. The Commission must ensure that information is secure and that whilst wider access is the basic principle, this must be balanced and safeguarded with appropriate security policies and practices. The Commission must recognise that information management plays a critical role in business continuity. In the role as regulator the Commission must understand manage information that it holds in full understanding of commercial confidentiality.

7.10. **Maximisation:** The commission must realise the potential of the information it holds and look to expand its knowledge base. The Commission is adopting the business delivery framework of the NIM. In order to do this the overriding principle is one of being information-led; making evidence based decisions through maximising the use of information gathered by the Commission. Information must be used both strategically and operationally.

7.11. Maximising our information will necessitate the continual development of the Strategic Intelligence Assessment (SIA) and other NIM products, policy development, risk assessment and performance management processes, to support corporate, strategic and operational planning and delivery.



7.12. The value of information is dependent upon the ability to analyse it. We will develop our analytical capabilities. Delivery of many parts of the Commissions business is related to geography and as such we will maximise the potential of the spatial information collected to improve delivery.

7.13. It is also important that information is maximised to support internal and external communications and in development of the FOIA publication scheme.

7.14. A significant information resource is that of the knowledge held within the Commission's employees in the form of tacit knowledge. The Commission must develop knowledge management practices to avoid knowledge silos and develop organisational resilience.

7.15. **Disposal:** A critical element of the Information Cycle is disposal of information. The Information Commissioner, Richard Thomas, has made it clear of public bodies that *"we are collecting and storing far more information that we need, for far longer than needed."* This relates to ensuring that there is clarity of purpose behind what is collected and why.



7.16. Storing more information than is needed and for longer creates risks associated with increasing the difficulty to manage and more damage when errors are made.

7.17. The Commission must develop and practice robust information retention and disposal policies. This is most apparent in relation to personal information that is captured by the Commission. Duplicated information stored in disparate places must where possible be avoided to reduce the complexity and risk. Designing an appropriate data model linking all relevant information will help to ensure consistent retention and disposal policies can be embedded within the Commission.

7.18. **Leadership:** Successful information management requires clear direction and strong leadership through a willingness to challenge and change the ways we work to ensure that we receive what we need and maximise its use.

7.19. Effective leadership is essential. We must focus on understanding what we need, improving our management processes and embedding the disciplines of agreed systems of work. There must be recognition that information management will not be achieved through any 'silver bullet' information technology (IT). Whilst in many cases a critical enabler; it is not the primary basis of good information management.

7.20. Leadership must focus on delivery and in doing so recognise complexity. Practical benefits will be achieved by identifying and realising where quick incremental improvements can be achieved and delivery helps to build confidence.



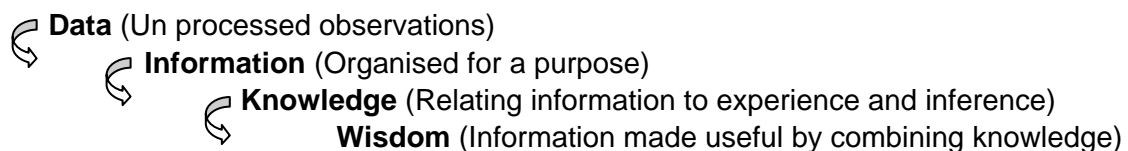
8. Commission principles of information management

8.1. The Commission will adopt ten information management principles that should be culturally embedded within the Commission through positive leadership.

Principle 1: Information is corporate resource

Rationale:

Information is a valuable corporate resource; it has real, measurable value in assisting rational decision-making. Similar to other resources, the Commission must manage how information is produced, consciously used, and effectively deployed throughout its lifecycle. As a corporate resource information has a hierarchy.



Implications:

- A significant impact upon the culture and management capabilities of the Commission. There are implications for the education of employees to understand the value of information and clarity as to who is accountable for managing information throughout its lifecycle.
- To ensure employees responsible for the capture of information produce quality and timely work and quality assurance procedures adhered to. Information quality becomes a measure of performance.
- The Commission must have a capability to determine its corporate information resource needs.

**Principle 2:
Information management is the responsibility of every employee**

Rationale:

There is a clear personal responsibility for information. Although information is for collective usage by the Commission it is the individual who has responsibility for its creation and management. This means an individual must feel responsible for the information they create.

Implications:

- There is a requirement for a consistent approach that must be embedded through a training and development schedule lead by the Information Management function.
- There must be a culture of breaking down any departmental barriers in order that individuals recognise the flow of information and the usage across all functions and the impact an individual can have on these both internally and externally.
- It is vital for all management within the Commission to understand roles and responsibilities for information management.

**Principle 3:
Information has a common vocabulary and data definition**

Rationale:

Information will be defined consistently throughout the Commission, without exception. Definitions should be understandable and available to all employees and relevant stakeholders. Information should be structured and in accordance with an agreed data model but both unstructured and structured data must have a common definition throughout to enable sharing of data. A common vocabulary will facilitate communications, enable effective cross functional working, facilitate interoperability of systems and reduce duplication.

Implications:

- A common data model is essential to the development of the Customer Relationship Management (CRM) system currently being implemented.
- Much of the CRM project work will determine the common vocabulary and help bring together possible duplicate or differing versions of information held by the Commission.

**Principle 4:
Information is quality assured and fit for purpose**

Rationale:

The Commission must ensure that the information it collects and holds is sufficiently accurate for a well defined purpose. This will give the Commission and external stakeholders, including government, confidence in the decisions made by the Commission.

Implications:

- There will be a clear strategic process to identify the purposes of information collection in support of information-led, evidence based decision making.
- Collection and manipulation of information will be reliable and will reflect consistent processes. This will allow for meaningful comparison where appropriate.
- Information collected will be complete and captured only once at the first opportunity and be '*right first time*' such that it can be utilised and maximised for decision making purposes.
- Data will be timely, so that its usefulness for decision making can be maximised and assists the Commission with its transactions that generate income. If information is incorrect there will be knock on affects such as incorrect fee calculations which in turn effect income generation.
- Where information is no longer needed and has served its purpose the Commission will have

- robust data retention and disposal policies and procedures .
- The Commission must implement tight version control.

Principle 5: Information is accessible and secure

Rationale:

The Commission makes information accessible to all except where there is a specific and agreed reason not to. Wide access to information leads to efficiency and effectiveness in decision-making, and affords timely responses to information requests and service delivery. The first question to ask should be "is there a reason why this information be restricted?" rather than "why should I let anyone see it?". Open sharing of information and the release of information via relevant legislation must be balanced against appropriate and robust restrictions on the availability of information where necessary.

Implications:

- The Commission must ensure that appropriate means of accessing information are available to employees. A pertinent example would be with remote employees that rely heavily upon an ability to access information in order to be able to operate remotely.
- Consideration must be given to secure channels of communication and appropriate treatment/ marking of documentation such as current policy or Government Protective Marking Scheme.
- There is also an important distinction between an ability to access information and understand it. Training and supporting metadata must accompany access to information.
- There will be flexibility in approach to accessing information whilst maintaining a common vocabulary and single up to date information record.
- Where information is held electronically, the Commission must make the area where it is stored as open as possible and, externally, publishing the information on the website or other public source.
- There must be appropriate policies and practices that are acted upon with a requirement to evidence their usage. The Commission must scrutinise the need, purpose and security around this information to form an information assurance risk assessment and determine appropriate procedures such as retention and disposal policies.

Principle 6: Information is shared

Rationale:

Information sharing supports collaborative effort and efficiency gains both when sharing is within an organisation and with external partners. There is an opportunity to enhance the information capture in support of the strategic and operational delivery. This can be done through establishing appropriate collaboration and strategic alliances. Information sharing is a powerful means to be able to proactively do this.

Implications:

- Information must not be the preserve of the few but an asset to all.
- The Commission must commit to a principle of information access and sharing.
- The Gambling Act 2005 schedule 6 enables sharing of information and the Commission must look to be proactive in developing information sharing relationships.
- The Commission must look to recognise commonality and reduce complexity through generic proforma products such as Information Sharing protocols (ISPs) or Memorandums of understanding (MOUs).

Principle 7: Information is not duplicated

Rationale:

Development of information services available *across* the Commission is preferred over the development of information silos which are only provided to a particular service or group of services. Duplication of information is also duplication of effort or resource and this will impact upon the efficiency of the Commission. Duplication will lead to confusion over accuracy with conflicts of information.

Implications:

- The Commission will need to determine what its core information requirement is and set about ensuring there is a **single version of the truth**.
- Adhering to the principles of information management will ensure that this information does not conflict and is reliable, trustworthy and secure.
- Projects currently underway within the Commission such as the CRM will rely on a Commission dedicated to avoidance of unnecessary duplication.
- Communication must be used efficiently with appropriate policy and usage of email.

Principle 8: Keeping records of what the Commission does with an agreed retention policy.

Rationale:

The Commission should consider that it has a duty to be able to provide evidence for decisions that it has made in the course of its business. This would be expected of the Commission through any form of external audit or inspection. It is also a vital component of operating a problem solving and progressive organisational approach where decisions are routinely evaluated. The Commission must not however act as a hoarder of information and through a well practiced retention policy information must only be retained for an appropriate and specified period.

Implications:

- The Commission has a responsibility to keep records of what it does. It is critical that records of decisions and actions are complete and accurate. The Commission must be able to provide a full history of its decisions and actions and these must be accessible to those within the Commission who may reasonably require them and potentially outside under legislation such as the Freedom of Information Act (FOIA) or the Data Protection Act (DPA).
- Complete records may be needed in a number of circumstances, for example; to demonstrate the chain of events and decisions that led to a particular course of action; or to respond to enquiries from within the Commission or from outside.
- All the details relevant to a decision or action needed to understand the complete picture should be retained for an appropriate period, take into account a well defined retention policy, and be easily located and associated when required.

**Principle 9:
Information is compliant with statutory and regulatory responsibilities**

Rationale:

There are a number of legal requirements that govern the use of information by the Commission. As a non departmental public body there is an ethical imperative and reputation to maintain, compliance is an essential aspect of this. Relevant to good information management is a Commission-wide understanding of the relationship between the Commission and the industry it regulates.

Implications:

- This principle places a responsibility on Commission employees to comply with guidance relating to legislative and regulatory requirements.
- It is imperative that the Commission in its position as regulator sets a positive example to the gambling industry and government by adhering to regulatory and statutory responsibilities and the Commissions information management principles.
- Compliance will help us ensure that our information management practices are consistent and appropriate. Examples include observation of policies regarding FOIA and DPA.
- The relationship between the Commission and the industry must be explicitly understood. The Commission must recognise the potential for commercial conflicts and account for this in its approach for open access to information.

**Principle 10:
Information is Maximised to the benefit of Commission Decision Making**

Rationale:

The commission must realise the potential of the information it holds and expand its knowledge base. Effective leadership is essential and must focus on understanding what we need, improving our management processes and embedding the disciplines of agreed systems of work. A clear purpose must drive the usage of the information to extract its maximum potential. The principle is the corner stone of the Commissions aim to use information to achieve its strategic objectives.

Implications:

- Maximising information will necessitate the continual development of the Strategic Intelligence Assessment (SIA) and other NIM products, policy development, risk assessment and performance management processes, to support corporate, strategic and operational planning and delivery.
- The Commission aims to be a risk based organisation and must maximise the use of its information as part of a corporate risk model.
- The Commission must determine both what information it no longer requires and equally where there are significant information gaps. This will require acceptance of change in Commission practice to both dispose of and cease collection of unnecessary information and the capture of information to plug the identified knowledge gaps.
- The value of information is dependent upon the ability to analyse it therefore the Commission will develop its analytical capabilities.
- Delivery of many parts of the Commissions business is related to geography and as such the Commission will maximise the potential of the spatial information collected to improve delivery.
- . The Commission must develop knowledge management practices to maximise the tacit knowledge of its employees to avoid knowledge silos and develop organisational resilience.
- The Commission will require strategic leadership in the form of a dedicated steering group who have the responsibility for development of Commission information assets.

Research References:

Papers

- Knox, Haggie; Kingston, John; University of Edinburgh School of Informatics, "*Choosing Your Knowledge Management Strategy*", (August 2003).
- Transport for London, "*Data Management Principles*", (October 2007).
- Salisbury District Council, "*Draft Information Management Strategy Version 1*", (February 2005).
- Association of Chief Police Officers of England, Wales and Northern Ireland, "*Information Management Strategy for the Police Service*", (October 1999).
- Scottish Executive, "*Information Management Principles*", (May 2004).
- IT Governance, "*Information Security and ISO27001 – an Introduction*", (January 2006).
- Exeter City Council, "*Information Management Strategy*", (May 2006).
- Test Valley Borough Council, "*Information Management Strategy 2002-2007 Issue 3*", (February 2003).
- Derbyshire Constabulary, "*Information Management Strategy Standards and Working Practices*", (March 2007).
- Dyfed-Powys Police, "*Information Management Strategy Standards and Working Practices*", (March 2007).
- Lincolnshire Police, "*Information Management Strategy version 0.3*", (March 2007).
- Department of Finance and Personnel Northern Ireland, "*Information Management Strategy Version 1.3*", (February 2004).
- Lancaster City Council, "*Information Management Strategy version 2.0*", (May 2007).
- University of Edinburgh, "*Knowledge Management Plan*", (July 2005).
- Heatherwood and Wexham Park Hospitals NHS, "*Knowledge Management Strategy 2005-2008*", (April 2006).
- Isom Angela, Siemens Insight Consulting, "*Moving to a Paperless Office - Is it Just About the Cost of the Technical Solution? A white paper*", (August 2006).

Websites

- <http://www.idea.gov.uk> Improvement & Development Agency (I&D^eA) Developing a Knowledge Management Strategy (visited July 7th 2008).
- <http://www.morse.com/> Information management strategy.htm (visited July 4th 2008).
- <http://www.socitm.gov.uk/> (visited July 4th 2008).