

INFORMATION GOVERNANCE FOR SHARING PERSONAL DATA

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Abstract

The questions raised in the call for papers for the Directors' Roundtable on Information Governance, 24th November 2008, are addressed. The context selected is the highly complex requirements for sharing personal data in multi-agency partnerships. Intra-agency information governance is inherently simpler and not considered. The conclusion is that much work has already been documented by the Local Government and Voluntary Sector in interfaces with other Central Government agencies. In particular, the guidelines produced in the FAME National Project should be followed and used to provide a contextual framework for any new information governance initiatives involving multi-agency partnerships.

How can and should good practice be identified, fostered and enforced?

This paper focuses on work, sponsored by DCLG (as ODPM), to improve multi-agency service outcomes. Results from several projects in different regions and service areas led to a generic framework and a roadmap for building multi-agency partnerships. All the information is freely available on the [FAME](#) website.

Fundamentally, Governance, including Information Governance cannot stand on its own; it needs a full context. Concentrating on any single aspect would not achieve the quality of outcomes desired. [FAME](#) showed that Practice, Governance and Technology must be balanced. Delivering a sustainable service requires all three.

The context provides a shared vision of improved outcomes. All parties need to acknowledge the contribution of others; information sharing is a necessary building block for building a partnership. The Practitioner, the Lawyer and the ICT Manager moving ahead together, understanding one another's problems. For a high quality service, good service practice, good governance practice and good technology practice is everybody's concern.

Enforcement is more complex. Each professional discipline has its own standards and guidelines. There may even be conflicts between them at a service or governance level. Information sharing protocols have to be negotiated that take account of professional sensitivities. Enforcement is a shared responsibility, but who has the authority to act? Taking the example of issues raised in the Climbié enquiry; people had life-saving information but did not sense the right or duty to share it. Do the tools exist for an enforcement agency to identify that insufficient information sharing is taking place?

Information governance is only a small part of the total context of delivering multi-agency services.

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How much is about people processes rather than technology?

[FAME](#) guidance is clear. Practice and Governance processes are supported by Technology. And in that order. Multi-agency service requirements should be citizen centric. For example, children with disabilities and their families may be faced with having to obtain services from twenty or more agencies. Each agency has its own processes to support; interfacing with others is not straightforward. Drafting the information sharing protocols is a major effort in itself.

Involving technologists at an early stage can limit thinking into what is easy rather than desirable. They may have a vested interest in protecting a data silo. Valuable opinions and options are ignored because implementation is hard. Most systems achieve operational objectives, without regard to external identity management, information sharing or transaction processing requirements.

At the risk of being controversial, Technology is backward. It does not reflect real life. Take the example of children who have several concurrent names and addresses through social need; one identity at school during weekdays and another with a different parent during the weekend. Apparently 60% of UK children do not share the name of both their parents. Social workers have no problem understanding the facts. Including traveller communities and illegal immigrants, what is the probability of obtaining a single unique identifier for every person in the UK? Simple, zero.

Rather than supporting the political ideal of a unique identifier that can operate across multi-agency boundaries, Technology should be promoting and demonstrating the methods of managing multiple identities. Very few Chief Technology Officers have even heard of ISO 18876, let alone consider using it to create interoperable systems. Are they aware that the private sector has already developed solutions that might comply to the standard?

Should the agenda be driven by industry, the professions, government or regulators - given that officials now appear less trusted than business, albeit more than politicians or journalists?

To revert to the first question; Vision comes first, not the Agenda. A vision is an image or a picture with emotional connotations. It should inspire people. It need not say anything about how to get there, nor the cost of the journey. This is rightfully in the bailiwick of politicians, whether you trust them or not. A vision can show the benefits, but beware the risks of mirages. A journalist should report the facts; with freedom to comment on politicians' aspirations.

It may be semantics, but I regard an agenda as a list, say of goals or things to do. It's more about the processes of getting to an end-point. It could be roadmap with key stages identified. Politicians obviously have part to play, but the details are sensibly left to industry, professions, regulators and government officials. I'd also like to include a large measure of public consultation in the agenda. Citizens and businesses have a right to be part of the process.

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The media seems to be driven by a good story. They seem to want to shape public opinion, rather than elucidate it. As a friend put more bluntly, "*The media is driven by the need to sensationalize everything in order to boost ratings or sometimes to influence voting intentions. Shaping public opinion is largely focused on creating a sense of outrage, couching everything in terms of extremes, or pinning the blame on a scapegoat, without consideration of all the details.*" Can we really believe all the horror stories of failed public sector integration projects? Are they right about doomsday scenarios of lost data, stolen identity and loss of privacy? Partially, I suspect.

Then there are vested interests of consultants and ICT services suppliers. Information sharing, even within one Government department or agency, is big business. Complexity rises exponentially with multi-agency services. Getting it wrong first time round is not a serious risk if you are appointed to do it again. Readers of "Private Eye" are well aware of the apparent lack of damage to reputation caused by failure of public sector contracts.

And who is willing to lead?

Leadership will always be an issue. Partnerships do not start with a leadership structure; they have to grow it organically. They do not start with a board of directors; but they may decide it is necessary. Managers and staff must synchronise the vision, mission, values and strategies of their own enterprise with those of the partnership. Some aspects identified in [FAME](#) were:

- Agreed responsibilities and roles of the partnership board, agencies, executives and service delivery teams;
- Clear processes for decisions taking at the right level;
- Robust and inclusive processes for identifying partners and reviewing the membership;
- Not all stakeholders want to be deeply involved. 'Inclusivity' is about contributing in ways and at times that are relevant to them;
- Recognition of private sector differences in pace, style, decision making and motivation to the public sector;
- A strategy for sustaining the partnership. Expect contribution to funding to be a significant factor.

Information Sharing Governance starts with Practice requirements, not agreement about ownership of attributes on databases. Note the low influence of Technology identified in leadership.

Political leadership is also part of the equation. Functioning partnerships, such as the successful [Northumbria 101](#) single non-emergency number, could not be sustained when political and ministerial support was withdrawn.

Who is willing to follow them?

"Good leaders beget good followers." This could not be found on Google, so it must be an original quote. However there is plenty of support for the concept, such as a theme of bi-directional trust between a leader and a

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follower. This is critical in multi-agency services, where trust crosses agency boundaries and tunnels between information silos.

Consider a fleet of sailing ships. Every ship has autonomy under the leadership of a captain; every ship may have a specialised role. There is an admiral commissioned to achieve a political vision who sets the agenda for fleet movements. A truism, but communication between the ships is essential for success.

Analogies can be taken too far, but it is fair to say that good followers can be recruited and trained far more easily than good leaders. Given clear processes and guidelines, service delivery partnerships can accomplish better outcomes, more effectively and more efficiently than individual agencies. Personal motivation and morale is boosted by having trust returned by leaders ... and the proper levels of technology support.

Who is willing to contribute what to making it all happen?

Knowledge management should expose the research literature and examples of good practice. Some excellent material is already published, such as the Local e-Government Standards Body [Information Governance](#) draft guidelines.

The wider context is revealed in the [FAME Generic Framework](#), which interrelates the following building blocks:

- Scoping Statement and Business Case Development
- Legal Powers, Responsibilities and Policy
- Information Sharing
- Governance
- Identity Management
- Infrastructure
- Messages, Events and Transactions
- Federation
- Sustainability

People are unlikely to be an expert in all these topics, but a set of tools can guide partnerships into taking steps forward.

The message has been accepted by EURIM Data Sharing Group and the KUDOS project. The latter is a partnership of Kent County Council, its Districts, Kent Police and Kent Connects. The initial step is building a business case for data sharing, not a legalistic information sharing protocol.

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