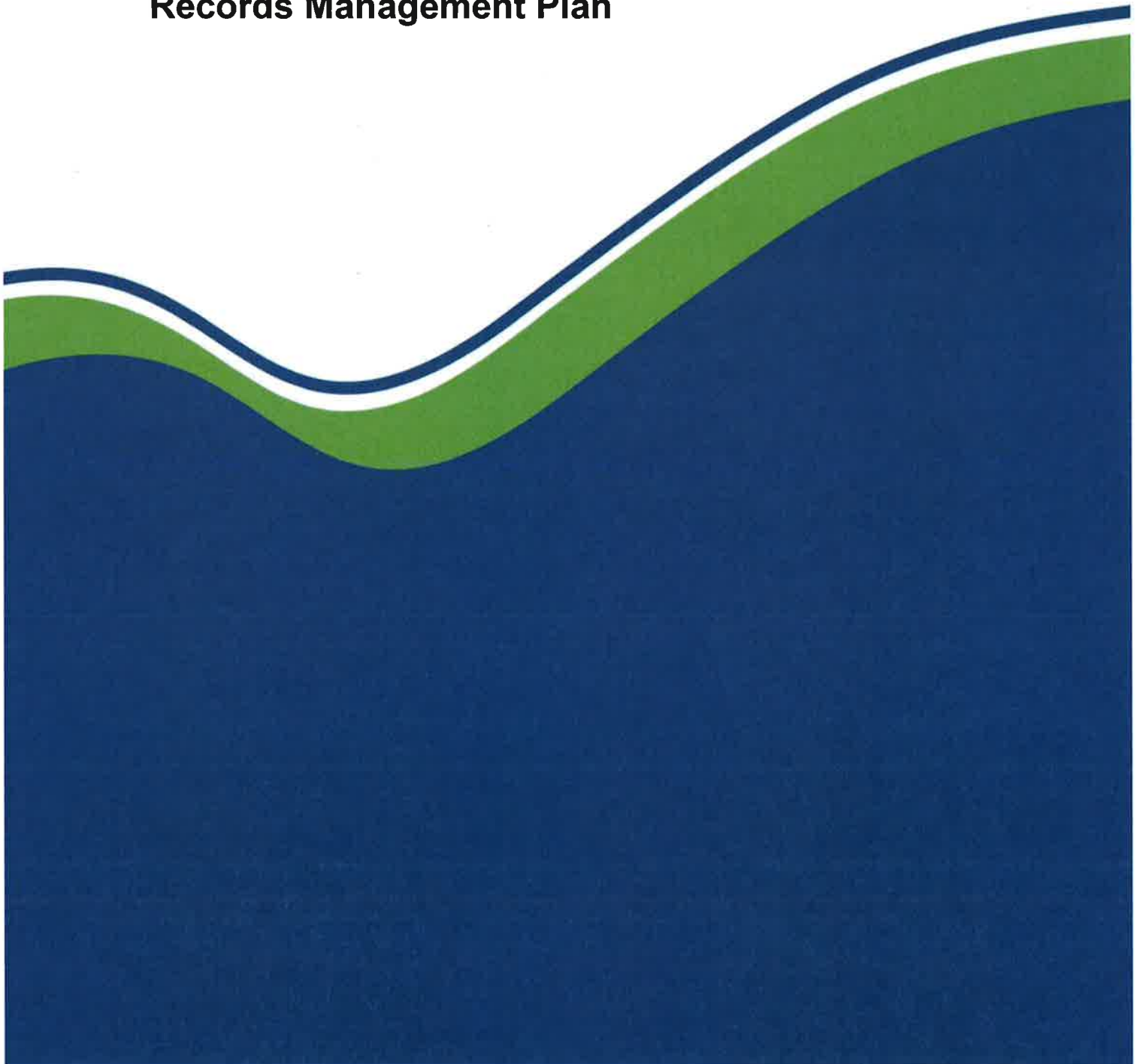




Public Records (Scotland) Act 2011

Records Management Plan



**Public Records (Scotland) Act 2011
Records Management Plan**

**Submitted to the Keeper of the Records of Scotland
18 November 2013**

As approved by:

**Allan Reid
Chief Officer (Governance)
Scottish Environment Protection Agency**

Revision History			
Revision	Description	Author	Effective Date
1.0	Records Management Plan for submission to the Keeper of Records of Scotland	Alison Mackinnon	18 November 2013

INTRODUCTION

Under Section 1 of the Public Records (Scotland) Act 2011 ("the Act") Scottish public authorities must produce and submit a records management plan ("the Plan") setting out proper arrangements for the management of an authority's public records to the Keeper of the Records of Scotland ("the Keeper") for his approval.

The Scottish Environment Protection Agency recognises the need for good records management practices in order to meet statutory obligations and deliver the services of the organisation. Effective records management not only leads to accountability and transparency, but also enables staff to have access to the right information at the right time, and make the right decisions. This transparency is driven from senior management to ensure that appropriate records are created and maintained. Senior management also recognise the importance of maintaining a corporate memory of events and activities and is committed to providing sufficient staffing, technical and organisational resources to ensure that the above requirements for dealing with records can be achieved and maintained.

SEPA is committed to treating its records and the information contained as assets, and this plan outlines the principles of records management which allow the identification and handling of records through their lifecycle to be managed.

The Plan applies to all records irrespective of the technology used to create and store them or the type of information they contain.

The Records Management Plan contains a description of SEPA's current processes and procedures for each of the required elements, as listed below:

1. Senior Management Responsibility
2. Records Manager Responsibility
3. Records Management Policy Statement
4. Business Classification
5. Retention Schedules
6. Destruction Arrangements
7. Archiving and Transfer Arrangements
8. Information Security
9. Data Protection
10. Business Continuity and Vital Records
11. Audit Trail
12. Competency Framework for Records Management Staff
13. Assessment and Review
14. Shared Information

Each section also lists evidence in support of SEPA's activities. Where relevant, details of the proposed Improvement Plan to deliver the necessary requirement are outlined with timescales.

**Element 1
Senior Management
Responsibility**

An authority's RMP must name and provide the job title of the senior manager who accepts overall responsibility for the RMP that has been submitted

The strategic responsibility for records management lies with **Allan Reid, Chief Officer (Governance)** as the Senior Accountable Officer under the terms of the Section 2(a)(i) of the Public Records (Scotland) Act 2011.

He is a member of the Agency Management Team and is Clerk to the Agency Board.

**Element 1
Evidence**

- *Covering Letter*
- *http://www.sepa.org.uk/about_us/management_team.aspx*
- *SFI 1 Corporate Governance*

**Element 2
Records Manager Responsibility**

An authority's RMP must name and provide the job title of the person responsible for the day-to-day operation of activities described in the elements in the authority's RMP. This person should be the Keeper's initial point of contact for records management issues

The corporate operational responsibility for records management is within the remit of Alison Mackinnon, Information Manager, who is responsible for the implementation of the Records Management Plan. Her contact details are as follows:

Alison Mackinnon
Information Manager
Scottish Environment Protection Agency
Erskine Court
The Castle Business Park
Stirling
FK9 4TR
alison.mackinnon@sepa.org.uk

The Information Manager's responsibilities, as outlined under the terms of the Records Management Policy, include:

- ensuring that SEPA's records management is compliant with the requirements of the Public Records (Scotland) Act 2011
- ensuring that the elements of SEPA's Records Management Plan and any associated improvement plans are implemented
- Ensuring that appropriate Records Management policies, procedures and guidance are maintained and implemented relating to, inter alia:
 - Record Management and record-keeping of SEPA records
 - Destruction and disposition of records
 - Vital records
- ensuring that the SEPA Business Classification Scheme and Fileplan and Retention and Disposal Schedules are fit for purpose and implemented
- Implementing appropriate training and awareness to SEPA staff
- Providing advice to the Senior Accountable Officer on all relevant issues

Element 2 Evidence

- *Covering Letter*
- *BPS-002 Records Management Policy*

**Element 3
Records Management Policy
Statement**

The Keeper expects each authority's plan to include a records management policy statement. The policy statement should describe how the authority creates and manages authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. The policy statement should be made available to all staff, at all levels in the authority.

SEPA's Records Management Policy (BPS-002) is an integral element of the ISO 9001 Quality Management System. It is authorised by the Chief Office (Governance).

The Policy is supported by the Records Management Procedure (BP-004) and specific Records Management Handbook. All documents are held on the QPulse Quality Management System and are available and accessible to all SEPA staff via the Intranet.

There is also a Records Management section on SEPA's Intranet providing links to the documents noted above and additional contact details.

All new staff members receive a presentation on key records management issues at the Corporate Induction. Further training and awareness is provided as required.

Element 3 Evidence

- *BPS-002 Records Management Policy*
- *BP-004 Records Management Procedure*
- *BP-132 Records Management Handbook.*
- *Extract from Section 30 of Environment Act 1995*

**Element 4
Business Classification**

The Keeper expects an authority to have properly considered business classification mechanisms and its RMP should therefore reflect the functions of the authority by means of a business classification scheme or similar

A functional Business Classification Scheme was developed for corporate records in 1998 and the development of an overarching Fileplan encompassing all SEPA functions was initiated in 2010.

The main elements of the Scheme are outlined below:

Functions	The Functions are linked to SEPA's Outcomes as contained in the Annual Operating Plan
Activities	Areas of Work or Activities which are used to describe the major tasks performed by SEPA to accomplish each of its functions. Several activities may be associated with each function.
Processes/Collection of records	Details of Specific Processes or Collections of Records , relating to the tasks which take place on a regular basis to perform each activity

Work on the detail of the Scheme and resultant Fileplan has progressed in response to specific business drivers, such as planned building moves and restructuring. Consequently, some areas of the Scheme have been analysed and defined in more detail.

SEPA has recently completed a project to facilitate the back scanning of regulatory records for a number of Operations teams, prior to a planned building move. During the design phase of the project, a detailed analysis of the activities and processes relating to regulatory records was undertaken and a Fileplan was agreed and implemented in the EDRMS, in which these records are now held.

Element 4 Evidence

- *Corporate records Business Classification Scheme*
- *Fileplan mindmap*
- *Regulatory records fileplan*

Element 4 Improvement Plan

SEPA recognises that the current Scheme is not comprehensive and that further development of the Scheme will be required to contain comprehensive metadata on all SEPA functions.

SEPA is in the process of defining an improvement plan to underline SEPA's commitment to work towards meeting towards the requirements of Element 4.

The methodology developed during the project will be used as the model for the reappraisal of the existing Business Classification and Scheme and overarching Fileplan.

The overall Scheme when complete will include the following information:

- function;
- activity;
- transaction (type of record / information);
- protective marking under Security Policy Framework
- retention & disposal information;
- vital records / location of original and working copy;
- access rights; and
- Information Asset Owner

The Scheme will include metadata relating to Functions where records are currently held in existing Line of Business systems, shared drives and in paper format. It will also hold metadata on SEPA's data holdings, as part of broader information governance for all information held by SEPA. There will also be clear links to the Security Policy Framework and the requirements for assessment of information risk, through the role of Information Asset Owner in respect of records and data.

Guidance on the Scheme for managing paper and electronic records will be produced and circulated prior to the Scheme being implemented corporately.

An implementation plan will be developed for the design and roll-out of the Scheme throughout SEPA. This will be added to the published RMP when ready. It is estimated that the review and design phase should begin in January 2014 with a planned roll-out across the organisation, taking around three to five years.

**Element 5
Retention Schedules**

An authority's RMP must demonstrate the existence of and adherence to corporate records retention procedures. The procedures should incorporate retention schedules and should detail the procedures that the authority follows to ensure records are routinely assigned disposal dates, that they are subsequently destroyed by a secure mechanism (see element 6) at the appropriate time, or preserved permanently by transfer to an approved repository or digital preservation programme (See element 7). An authority's RMP must demonstrate the principle that retention rules are consistently applied across all of an authority's record systems

SEPA's Records Retention and Disposal Schedule defines the prescribed retention periods for specified record types. The Schedule is an integral part of SEPA's accreditation documentation for ISO 9001 and 17025. The schedule is available to all staff via the Quality Management System (Q Pulse).

Any records created under the auspices of processes that are subject to SEPA's accreditations under ISO 9001 and 17025, are retained for a minimum period of 6 years.

A significant proportion of SEPA's regulatory records do not have defined retention periods based on statutory authority. Retention periods are set after consultation with the records owners, based upon the operational and historical value of the records.

Element 5 Evidence

- *BP-139 SEPA Retention Schedule*
- *OD Retention Schedule*

Element 5 Improvement Plan

SEPA recognises that the current Records Retention and Disposal Scheme should be more closely aligned with the Business Classification Scheme and Fileplan, to ensure that retention periods are applied to records, irrespective of the format or media in which the records are held.

As indicated in the Improvement Plan for Element 4 above, it is proposed that the retention and destruction arrangements will be included in the improvement plan relating to future developments of the Business Classification Scheme.

An implementation plan will be developed for the design and roll-out of the Scheme throughout SEPA. This will be added to the published RMP when ready. It is estimated that the review and design phase should begin in January 2014 with a planned roll-out across the organisation, taking around three to five years.

**Element 6
Destruction Arrangements**

Section 1(2)(b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records. An authority's RMP must demonstrate that proper destruction arrangements are in place.

SEPA has a formal destruction process for paper records which are not protectively marked. The Records Management Co-ordinator is responsible for overseeing the process.

Records are identified for potential disposition, where the records review date derived from the Retention Schedule is reached. A report is sent to the Records Owner for review. Where records are designated for destruction, a SEPA Destruction Certificate must be generated and signed by the Records Owners before the instructions to destroy any records are issued.

Copies of the Certificates are retained and matched with the certificates provided by the external contractors when the destruction is carried out.

- Inactive records, held offsite with SEPA's storage supplier, Iron Mountain, are destroyed on their premises. A Destruction Certificate is provided.
- Where inactive records are identified, which are held on SEPA premises, these will be destroyed by an external contractor, under a call-off contract. The operator will provide a Destruction Certificate at the completion of the on-site destruction.

Protectively marked information is destroyed in accordance with the requirements of the Cabinet Office Security Policy Framework (SPF)

SEPA also has procedures to ensure that on the re-use or disposal of computers or other storage media, any information on devices is appropriately destroyed prior to being given to another user or the device.

Element 6 Evidence

- *BP-173 Offsite and Destruction Procedures*
- *Example of SEPA Destruction Certificate*
- *IM Destruction Certificate*
- *Destruction certificate for on-site shredding*
- *WP-IS-18 – Data and Storage Media Destruction Procedure*
- *BP-100 Securing our Environment*

Element 7
Archiving and Transfer
Arrangements

An authority's RMP must detail its archiving and transfer arrangements and ensure that records of enduring value are deposited in an appropriate archive repository. The RMP will detail how custody of the records will transfer from the operational side of the authority to either an in-house archive, if that facility exists, or another suitable repository, which must be named. The person responsible for the archive should also be cited. Some records continue to have value beyond their active business use and may be selected for permanent preservation. The authority's RMP must show that it has a mechanism in place for dealing with records identified as being suitable for permanent preservation. This mechanism will be informed by the authority's retention schedule which should identify records of enduring corporate and legal value. An authority should also consider how records of historical, cultural and research value will be identified if this has not already been done in the retention schedule. The format/media in which they are to be permanently maintained should be noted as this will determine the appropriate management regime.

As a non-departmental public body, SEPA has deposited records with the National Records of Scotland, predominantly relating to its predecessor bodies. SEPA met with the National Archives of Scotland in 2002 to identify Records Series which would be suitable for permanent preservation.

Where records have been transferred to the National Records of Scotland, details are recorded in the Legacy Database and a Transfer Certificate is generated.

Future arrangements are due to be formalised by a Memorandum of Understanding (MOU) with the National Records of Scotland. SEPA recognises that arrangements for the preservation of digital records will have to be included in the MOU.

Element 7 Evidence

- *Copy of Transfer Certificate for Records passed to NRS (NAS)*
- *Correspondence with NAS relating to permanent preservation (2002)*

**Element 8
Information Security**

An authority's RMP must make provision for the proper level of security for its public records. All public authorities produce records that are sensitive. An authority's RMP must therefore include evidence that the authority has procedures in place to adequately protect its records. Information security procedures would normally acknowledge data protection and freedom of information obligations as well as any specific legislation or regulatory framework that may apply to the retention and security of records. The security procedures must put in place adequate controls to prevent unauthorised access, destruction, alteration or removal of records. The procedures will allocate information security responsibilities within the authority to ensure organisational accountability and will also outline the mechanism by which appropriate security classifications are linked to its business classification schemes.

SEPA is subject to the requirements of the Cabinet Office Security Policy Framework (SPF). Protective markings are applied to data and information in accordance with the current Government Protective Marking Scheme and Information Assets Owners are nominated.

The Information Security Policy provides a high level commitment by SEPA to adhere to the best practices of information security. It is formally owned by SEPA's Senior Information Risk Officer (SIRO). The policy is a framework which is augmented through business procedures. These supporting procedures focus on specific areas of information security and in some cases on specific audiences. They are approved and managed by the Information Security Group (ISG).

Training and awareness of information security is delivered via inductions, ongoing training sessions and direct emails. SEPA also uses the Cabinet Office Protecting Information e-learning packages for mandatory staff training on information security. The training focuses on protecting information.

All SEPA employees are required to complete Level 1 of the package on an annual basis. Information Asset Owners (IAO), Line Managers and staff who have responsibility for sensitive projects need to complete Level 2. Members of SEPA's Agency Management Team, the SIRO and IAOs are required to complete Level 3.

The IT Acceptable Use Procedure defines the responsibilities of SEPA employees and all others offered use of SEPA IT resources. This requires efficient, secure, ethical and legal utilisation of SEPA IT resources and is in compliance with the mandatory requirements of the Cabinet Office Security Policy Framework.

Element 8 Evidence

- *BP-100 Securing our Environment*
- *BP-021.70 SPF Mandatory*
- *BP-142 Information Security Policy*
- *BP-076 IT Acceptable Use Procedure*
- *BP-165 Working with Protectively Marked Information within SEPA offices*
- *WP-IS-019 Transfer of Data Procedure*
- *BP/HR/009 SEPA Employee Code of Conduct*

Element 9
Data Protection

The Keeper will expect an authority's RMP to indicate compliance with its data protection obligations. This might be a high level statement of public responsibility and fair processing.

In compliance with the requirements of the Data Protection Act, SEPA is registered as a Data Controller with the Information Commissioner's Office. Details of SEPA's registration (Z6161946) can be found on the ICO Register of Data Controllers at <http://www.ico.org.uk/esdwebpages/search>.

SEPA has a comprehensive Data Protection Policy approved by the Agency Board, which covers all aspects of SEPA's obligations under the Act. The Policy includes a Disclosure Policy relating to staff information. The policy is published on the SEPA website.

The Information Manager is the designated Data Protection Officer for the organisation, under the Specific Scheme of Delegation.

All requests to access personal information under the terms of the Data Protection Act are handled by the Access to Information team, led by the Information Manager.

Details on how to request personal data held by SEPA, by making a Subject Access Request, are available as part of the website Privacy Policy at http://www.sepa.org.uk/system_pages/privacy_policy.aspx.

All new staff receive a presentation including the requirements of the Data Protection Act at the Corporate Induction. Further training and awareness is provided as required. Data Protection is also included in the Protecting Information E-Learning package, as noted in Element 8 above.

Element 9 Evidence

- *BPS_003 Data Protection Policy*
- *BP-014Data Protection - Handling Subject Access Requests*
- *Extract from ICO Register of Data Controllers*
- *Privacy Policy page on SEPA Website*

**Element 10
Business Continuity and Vital
Records**

The Keeper will expect an authority's RMP to indicate arrangements in support of records vital to business continuity. Certain records held by authorities are vital to their function. These might include insurance details, current contract information, master personnel files, case files, etc. The RMP will support reasonable procedures for these records to be accessible in the event of an emergency affecting their premises or systems.

SEPA considers that Business Continuity Management is a fundamental component of good corporate governance. Business Continuity plans are required for all SEPA offices to document spell out how core business functions can be restored following any interruption. Completed plans are stored in the QPulse Quality Management System and are available to all staff via the Intranet.

Original copies of key agreements and documents are designated as Vital Records. They are stored in locked Firesafes. Document level metadata is recorded for each document.

Records held on SEPA's electronic systems are normally backed up regularly. Where required these records are replicated to a remote location as part of SEPA's Disaster Recovery procedures.

Element 10 Evidence

- *Example of Business Continuity Plans (large and small offices)*
- *ORG11 listing – Vital Records*
- *WP-IS-003 Backup procedure*
- *WP-12-023 DR Operational Support*

Element 10 Improvement Plan

An initial review of current Business Continuity Plans has indicated that there is no explicit reference to vital records in the plans.

As part of the Improvement Plan, SEPA will review these plans to ensure that the authors add appropriate details of relevant vital records. Standardised wording relating to the requirements of Element 10 of Records Management Plan will also be drafted for inclusion in updated Business Continuity Plans.

As indicated in the Improvement Plan for Element 4 above, the management of vital records will be included in the work undertaken relating to future developments of the Business Classification Scheme.

The inclusion of information on vital records in SEPA's Business Continuity Plans will form part the review of existing plans.

Element 11
Audit Trail

The Keeper will expect an authority's RMP to provide evidence that the authority maintains a complete and accurate representation of all transactions that occur in relation to a particular record. This information must be kept for at least as long as the record to which it relates.

SEPA recognises that its records are not and will not be held in a homogenous format or location, with all records held in a single repository. SEPA creates and holds a substantial amount of environmental and monitoring data, which is held in data repositories. The data is captured as a record of its sampling or monitoring functions. The output reports may then form part of processes relating to SEPA's regulatory functions.

Consequently there will be no single audit trail for some activities and processes. The metadata contained in the Business Classification Scheme should identify and record the various audit trails and information flows at Function, Activity and Process levels.

Examples of audit trails relating to SEPA records are given below:

Electronic Records

Electronic records held in Line of Business systems have audit trails within the relevant proprietary software. The various systems hold records for functions including Finance, HR, ePlanning and Regulatory Licensing. SEPA has also recently implemented an EDRMS to facilitate the back-scanning of regulatory records following an office move. During the scanning process, an audit trail was maintained for each document added to the system, which included details of Quality Assurance (QA) checks carried out on each scanned document, prior to sign off by the Records Owner. The relevant teams are now storing all new records on the system, and the daily scanning of incoming mail is subject to QA check.

The majority of the remainder of electronic documents and records are held on shared drives on servers, where there is no integral audit trail or version control.

SEPA also uses a Helpdesk system for the logging of Customer Service Complaints and Access to Information requests. Staff co-ordinating the formal processes create audit trails and records during the handling of the individual requests.

Paper Records

The majority of regulatory records are currently held as paper records. The active files are tracked by a variety of methods, depending on the size of the office and whether protective markings have been applied to the contents.

Once such records become inactive, they are logged and tracked under the auspices of the Offsite and Destruction Procedures. Transfer Certificates are issued and signed by Records Owners before records are sent offsite. Boxes are tracked with barcodes when sent to store or when retrieved. Destruction Certificates are also issued prior to destruction in accordance with the SPF. (See Element 6 for more detail). A full audit trail of records sent off-site, for destruction, or for permanent preservation is maintained by the Records Management Co-ordinator.

Protectively Marked Documents

Where required, the full lifecycle of Protectively Marked records is documented and signed off in a designated Protectively Marked Document Register.

Element 11 Evidence

- *Proforma Protectively Marked Document Register*
- *Back scanning quality assurance*

Element 11 Improvement Plan

It is proposed that the capture of metadata on audit trails relating to SEPA records will be included in the improvement plan relating to future developments of the Business Classification Scheme, as outlined in Element 4 above.

The management of records held on shared servers will be considered during the review and design phase of the plan. Any required changes to directory structures will be included in the planned roll-out programme.

SEPA recognises that improvements can be made in audit trails relating to paper records. Two specific initiatives have been identified:

1. Records from the existing database which tracks the retention and disposal of inactive records during the retention and disposition phase will be transferred to the recently implemented EDRMS by the end of March 2014.
2. An implementation plan will be developed to facilitate the transfer of tracking data for other paper records to the EDRMS. It is estimated that the review and design phase should begin in April 2014.

A project to assess existing SEPA activities and systems to develop and deliver an updated and fit for purpose Information Management Strategy is being planned for commencement in 2014-15. Information and data governance is a key component of the project deliverables.

The Element 11 Improvement Plan will be updated when more planning has been completed.

**Element 12
Competency Framework for
Records Management Staff**

The Keeper will expect an authority's RMP to detail a competency framework for person(s) designated as responsible for the day-to-day operation of activities described in the elements in the authority's RMP. It is important that authorities understand that records management is best implemented by a person or persons possessing the relevant skills.

The Records Management Policy outlines role and responsibilities of roles with specific records management activities. In particular, those with specific Records Management responsibilities include the Information Manager and the Records Management Co-ordinator.

Training and development needs relating to these responsibilities are assessed during the annual Staff Appraisal process.

The Information Manager is a Chartered Member of the Chartered Institute of Library and Information Professionals. SEPA is a corporate member of the Information and Records Management Society.

The Information Manager and Records Management Co-ordinator have both attended relevant training courses on Records Management topics over a number of years. They have also both passed AIIM Training Courses on Electronic Records Management.

The training requirements relating to the introduction of the new EDRMS software were defined during the project and targeted training is now ongoing for key staff carrying out system administration tasks for the system.

The SEPA Competencies Framework includes a specific Technical Competency for Information Management, which is applicable to staff members with specific Records Management responsibilities. More broadly there are core competencies for all staff on 'Managing Data and Information' and 'Governance'.

Element 12 Evidence

- *BPS-002 Records Management Policy*
- *Technical Competencies – Information Management*
- *AIIM ERM Certificates*
- *Laserfiche Training Plan*

**Element 13
Assessment and Review**

An authority's RMP must describe the procedures in place to regularly review it in the future.

The Records Management Plan will be uploaded to the Quality Management System (QPulse) and be held under the auspices of SEPA's accreditation under ISO 9001 and ISO 17025. The policies and procedures that support and evidence SEPA's RMP, including the Records Management Policy, Information Security Policy, Securing our Environment and Data Protection Policy, will be formally audited and reviewed regularly in line with SEPA's quality procedures.

SEPA is accredited under ISO9001 and are subject to regular audits for compliance with the standard. The management of records is a key element of the standard and the Information Manager has met with the external auditor to track progress on records management issues, including the development of the RMP. The most recent follow-up meeting was held on 12 November 2013.

SEPA also has an internal and external audit programme. Activities which fall within the scope of elements of the RMP are audited on a regular basis.

Element 13 Evidence

- *Extract from LRQA Surveillance visit report – April 2013*

Element 13 Improvement Plan

SEPA is in the process of defining the formal governance relating to amendments and updates to the agreed Records Management Plan. It is proposed that business representatives, who formed the Project Board for the scanning project referred, should constitute the Project Board for the ongoing work on the RMP.

The governance arrangements will be confirmed by the end of March 2014 and added to the Records Management Plan when they have been signed off.

Element 14
Shared Information

The Keeper will expect an authority's RMP to reflect its procedures for sharing information. Authorities who share, or are planning to share, information must provide evidence that they have considered the implications of information sharing on good records management.

SEPA shares environmental data and information with partner bodies and external organisations. The sharing of information is generally underpinned by a Memorandum of Understanding (MOU) between the parties concerned.

Where SEPA has drafted the MOU, the documentation includes standard clauses relating to the information being shared or the records being created as result of any such sharing. An Information Asset Owner is assigned for any information to be shared or received and retention periods assigned.

SEPA takes account of the requirements of the *ICO Code of Practice on Data Sharing*. Privacy Impact Assessments are conducted when the sharing of data, including personal data, is being considered.

SEPA's Data Protection Policy includes a Disclosure Policy that defines what personal data relating to staff would be shared and in what circumstances. Where datasets of personal data are to be shared, a Data Sharing agreement would be drafted and signed by the parties concerned.

Element 14 Evidence

- *BP-152 MOU Development*
- *Template MOU Agreement*
- *Example of Memorandum of Understanding*
- *Example of Privacy Impact Assessment*
- *BPS-003 Data Protection Policy*

Element 14 Improvement Plan

SEPA recognises that robust information sharing exists within broader information and data governance framework. A project to assess existing SEPA activities in this area and develop and deliver an updated and fit for purpose Information Management Strategy is being planned for commencement in 2014-15.

Information and data governance including information sharing is a key component of the project deliverables. The Element 14 Improvement Plan will be updated when more planning has been completed.

