

**Information Management
Responsibilities and Accountability
GUIDANCE**

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1. PURPOSE

This guidance focuses on existing responsibilities for individuals, and mechanisms for monitoring the performance of those responsibilities (accountability).

The document aims to:

- identify existing/specified information management responsibilities across all levels of agencies for all public sector employees
- aggregate those responsibilities into a single document for easy reference
- illustrate the links between particular responsibilities and business outcomes that may be enabled by applying good information management principles
- indicate the type of position or level to which a responsibility applies
- summarise the key capabilities required to fulfil each responsibility
- suggest mechanisms which may be used to evaluate whether a responsibility has been fulfilled or discharged.

This guidance can help agencies implement the Information Management Framework and best practices for managing information across the NSW public sector.

2. INTRODUCTION

2.1 Information Management Framework

A key initiative of the *NSW Government ICT Strategy* is the development of an Information Management Framework to support the way government designs systems, administers and uses data and information.

The Framework is a set of standards, policies, guidelines and procedures which are implemented either manually or, where possible, automated through technology. This Framework will enable data and information to be managed in a secure, structured and consistent manner.

It will ensure that data and information can be appropriately shared or re-used – immediately and in the longer term – by agencies, individual public sector staff, the community or industry for better services, improved performance management and a more productive public sector.

2.2 Responsibilities and accountability

Across the public sector, staff at all levels are involved in the design, creation, use, analysis, distribution, and disposal of government data and information in the course of daily operations.

Responsibilities for managing government data and information apply across all content types and formats.

Responsibilities for managing data and information will vary according to employment level; the tasks associated with a particular position; and whether an individual is designated in a key role.

Responsibilities also apply to contractors, service providers or any other parties in the extended enterprise who may have access to government information.

It is important that staff are aware of their responsibilities in administering data and information – to enable them to fulfil these duties and to be held appropriately accountable.

The success of the Information Management Framework relies on staff recognising data and information as an asset of strategic, operational and administrative value; and handling it in a manner that is transparent and accountable. Policies can specify tasks, but unless responsibility is assigned and individuals are held accountable for carrying them out, implementation will be ineffective.

Education and training may be required to build capability in specific areas to effectively meet the requirements outlined in this guidance.

Agencies need to ensure that they have the necessary capabilities to fulfil their responsibilities, and that their information management processes ensure accountability.

The table below summarises the benefits of defining and assigning responsibilities for information management; and the risks of not doing so.

BENEFITS	RISKS
Staff understand their responsibilities and can act accordingly	Staff are unaware of their responsibilities
Information is regarded and handled as a corporate asset	Information is treated as a personal asset and not handled according to standards
Ensure staff have the requisite skills and capabilities to carry out the responsibilities assigned to them	Staff may not have the skills and capabilities required to carry out their responsibilities
Individuals can be held appropriately accountable for their responsibilities	No one can be held accountable for responsibilities that have been unfulfilled
Information can be managed in ways that enable better service delivery and better value investment Systems are designed to automate and enable strategic information management	Critical tasks may not be carried out; systems may not be enabled – leading to business risk such as breach of security or privacy, data lost, corrupted, unreliable and legacy data management obligations or costs

3. IMPLEMENTATION

This document provides guidance, which will be implemented by agencies in various ways according to their specific business needs and operating environment.

The designation or assignment of responsibilities for specific categories of data and information (for example: based on functional or subject-areas, systems or storage locations) will be determined by agencies according to their organisational structure, size, resourcing and staff capabilities.

Depending on circumstances, information management responsibilities could be carried out by an Information or Records Manager, Information Technology professional, operational staff, business manager, contractor, or shared across a combination of roles.

For effective implementation, support and oversight, the roles and responsibilities for information management should be clearly defined and assigned.

Some examples of ways in which this guidance might be implemented include:

- evaluating information management in the agency, to determine whether key roles and responsibilities have been assigned, and are being effectively managed
- workforce planning and staff development; identifying staff training and development needs, developing performance management strategies
- as text to be included in performance plans, linked to the NSW Public Sector Capability Framework
- preparing agency-specific policies or procedures that involve information management for example:
assigning responsibilities to a data owner/manager/user, regulation monitor, data quality officer, information champion or power user
- developing a hierarchical or network model of responsibilities which span different locations or cross functional lines
for example:
with respect to information security or business continuity and disaster recovery
- referenced at a high level in the key accountabilities of a role description
for example:
Leader/Manager – ‘Lead the implementation of information management responsibilities and accountabilities that are in line with agency/cluster policies’
Employee – ‘Implement information management responsibilities as per agency policy’
- incorporating information management into staff training or induction, ensuring staff understand the laws and policies that apply to information management, the benefits and risks associated with information management

- specifying information management responsibilities into agreements with contractors, service providers or any other parties in the extended enterprise who may have access to government information
- supporting other elements of the IM Framework, such as custodianship, information security, open data and licensing.

4. SCOPE

This document addresses the responsibilities and accountability of individual public sector employees. It should be read in conjunction with the *NSW Data and Information Custodianship Policy*, which address the responsibilities of public sector agencies with respect to specific datasets or information systems.

The guidance applies to all NSW Government Departments, Statutory Bodies and Shared Service Providers. It is recommended for use by State Owned Corporations, particularly where the organisation has adopted any of the standards and guidance indicated in Section 7.

5. RELATED GUIDANCE

This document is consistent with:

- guidance provided by the NSW State Records Authority on responsibilities for records management;
- guidance provided by the NSW Information and Privacy Commission on responsibilities for information access and privacy;
- responsibilities for information security outlined under Premier's Memorandum M2012-15 *Digital Information Security Policy*; and
- *NSW Public Sector Capability Framework*

6. CONTACT

For assistance with any aspect of this document, please contact:

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7. RESPONSIBILITIES AND ACCOUNTABILITY

The following table summarises key responsibilities for NSW public sector employees, with regard to the management of data and information.

About the table

<u>IM Principle</u>	The responsibilities are organised according to which business outcomes and pillar of the Information Management Framework is being supported.
<u>Responsibility</u>	<p>The first column describes a duty, obligation, or authority to act.</p> <p>It also notes the source from which the responsibility is derived.</p> <ul style="list-style-type: none"> - <i>Records Management</i> refers to standards and guidance issued by the State Records Authority of NSW; including the international standard for records management (ISO15489), endorsed for use in NSW Government as a Code of Practice by State Records. - <i>Information & Privacy</i> refers guidance and resources issued by the Information and Privacy Commission of NSW. - <i>Security</i> refers to the <i>NSW Digital Information Security Policy Premier’s Memorandum M2012-15</i>. - <i>Data Quality</i> refers to standards and guidance issued by the Australian Bureau of Statistics, which are progressively being endorsed and adopted for use in NSW Government.
<u>Who</u>	<p>These responsibilities apply to all public sector employees and are not occupation-specific.</p> <p>The second column specifies whether the responsibility is assigned to:</p> <ul style="list-style-type: none"> - all staff - a designated function or role such as Records Manager, Privacy Contact Officer, Senior Responsible Officer - staff with management responsibilities - members of the executive team.
<u>Accountability</u>	<p>The third column indicates examples of the mechanisms used to evaluate whether a responsibility has been fulfilled or discharged.</p> <ul style="list-style-type: none"> - <i>Performance management</i> refers to an individual’s annual performance and development planning, agreement and review. - <i>Audit</i> refers to a regularly scheduled assessment or inspection of an activity or business process. - <i>Reporting</i> refers to formal, written statements provided to a line manager, executive management or a supervisory authority.

Capability

The final columns of the table focus on the core knowledge, skills and abilities required to fulfil each responsibility.

All 20 capabilities described in the *NSW Public Sector Capability Framework* contribute to effective information management.

The table highlights key areas of capability that are fundamental to the delivery of the responsibilities.

Note:

This mapping should be used as a guide only. It has not been created for use verbatim in Role Descriptions or Performance Management, as all capabilities should be reviewed in the context of the role and the organisation.

IM PRINCIPLE: GOVERN Data and information are governed according to their value, as assets for which we are accountable			Act with Integrity	Plan and Prioritise	Demonstrate Accountability	Technology	Procurement and Contract Management	Manage and Develop People	Inspire Direction and Purpose	Optimise Business Outcomes
RESPONSIBILITIES	WHO	ACCOUNTABILITY								
Understand the information management responsibilities associated with the role; be familiar with the relevant policies and procedures ~ <i>Records Management</i>	All staff	Performance management								
Oversee the agency's information and records management program ~ <i>Records Management</i>	Designated	Reporting								
Ensure information management responsibilities are incorporated into agreements with individuals or organisations in the "extended enterprise" who may have access to agency information, for example: - consultants, contractors, service providers - part-time or temporary employees, interns - NGO or industry partners and associates ~ <i>Records Management</i>	Designated	Reporting								
Consider whether information responsibilities should be incorporated into staff role descriptions, performance and development plans ~ <i>Records Management</i>	Manager	Performance management								
Monitor staff within the team to ensure they understand and comply with information management policies and procedures ~ <i>Records Management</i>	Manager	Performance management								

IM PRINCIPLE: GOVERN			Act with Integrity	Plan and Prioritise	Demonstrate Accountability	Technology	Procurement and Contract Management	Manage and Develop People	Inspire Direction and Purpose	Optimise Business Outcomes
Data and information are governed according to their value, as assets for which we are accountable										
RESPONSIBILITIES	WHO	ACCOUNTABILITY								
Ensure information assets are strategically governed, considering the organisation’s role and objectives in the context of emerging trends, long-term opportunities and whole-of-government directions ~ <i>Records Management</i>	Senior executive	Reporting								
Provide direction and support for information management and security ~ <i>Records Management</i> ~ <i>Security</i>	Senior executive	Reporting								
Ensure data and information custodianship responsibilities are fulfilled according to the agency’s agreed role for specified datasets or information systems ~ <i>Records Management</i>	Senior executive	Reporting								
Provide sufficient endorsement and resources to enable a successful information and records management program ~ <i>Records Management</i>	Senior executive	Reporting								

IM PRINCIPLE: COLLECT Data and information are captured to enable services and operations; and collected in line with standards so they are fit-for-purpose			Act with Integrity	Think and Solve Problems	Deliver Results	Plan and Prioritise	Technology
RESPONSIBILITIES	WHO	ACCOUNTABILITY					
Create and capture data, information and records about daily work activities. <i>~ Records Management</i>	All staff	Performance management					
Perform data collection exercises according to quality standards <i>~ Data Quality</i>	All Staff	Audit					
Plan and manage data collection exercises in accordance with business needs, legal mandates or regulatory requirements <i>~ Information & Privacy</i>	Designated	Audit					
Incorporate data quality principles into all data collection, production and delivery processes <i>~ Data Quality</i>	Designated	Audit					

IM PRINCIPLE: ORGANISE			Think and Solve Problems	Deliver Results	Plan and Prioritise	Demonstrate Accountability	Technology	Optimise Business Outcomes	Manage Reform and Change
Data and information are organised for easy retrieval and efficient management									
RESPONSIBILITIES	WHO	ACCOUNTABILITY							
Ensure information is stored in approved agency systems / locations / media <i>~ Records Management</i>	All staff	Performance management							
Describe and link information according to standards so it is easy to search, retrieve, use and compare <i>~ Records Management</i>	All Staff	Audit							
Manage the storage and tracking of information assets (physical or digital) <i>~ Records Management</i>	Designated	Reporting							
Implement information management standards; develop, maintain and review policies, guidelines and procedures <i>~ Records Management</i>	Designated	Audit							
Monitor regulations to stay abreast of updates; ensure information policies and procedures are aligned; notify / communicate changes as required <i>~ Records Management</i>	Designated	Performance management							
Design and deploy an architecture which enables effective use, analysis, re-purposing and secure sharing of information to support strategic objectives and the organisation's role within government and the community <i>~ Records Management</i> <i>~ Information & Privacy</i>	Designated	Audit							
Ensure compliance with regulatory and reporting requirements for information management <i>~ Records Management</i>	Senior executive	Reporting							

IM PRINCIPLE: SECURE			Act with Integrity	Influence and Negotiate	Think and Solve Problems	Plan and Prioritise	Demonstrate Accountability	Technology
Data and information are secured to protect their integrity and with respect for their sensitivity								
RESPONSIBILITIES	WHO	ACCOUNTABILITY						
Understand privacy management principles; ensure personal or confidential information is securely stored and used appropriately <i>~ Information & Privacy</i>	All staff	Performance management						
Apply a security classification to ensure information receives the appropriate level of protection <i>~ Security</i>	All staff	Audit						
Report or communicate information security events, serious or substantial data loss, incidents, near misses or weaknesses associated with information systems <i>~ Security</i>	All staff	Reporting						
Develop Privacy Management Plans and Privacy Notifications; address privacy complaints; manage privacy reviews <i>~ Information & Privacy</i>	Designated	Reporting						
Implement controls to prevent unauthorised disclosure, modification, removal or destruction of information; monitor the processing and storage of information <i>~ Records Management</i> <i>~ Information & Privacy</i> <i>~ Security</i>	Designated	Audit						
Implement access controls; monitor access to agency information and systems <i>~ Records Management</i> <i>~ Security</i>	Designated	Audit						
Organise the independent review of information security systems <i>~ Security</i>	Designated	Audit						
Ensure the effectiveness of internal controls for information management <i>~ Records Management</i>	Senior executive	Audit						

IM PRINCIPLE: USE Data and information are used to support evidence-based policy, targeted service delivery, and re-used to derive maximum return on investment			Act with Integrity	Work Collaboratively	Think and Solve Problems	Technology	Manage and Develop People	Inspire Direction and Purpose	Optimise Business Outcomes
RESPONSIBILITIES	WHO	ACCOUNTABILITY							
Use data and information only as authorised and in accordance with the Code of Conduct ~ <i>Information & Privacy</i> ~ <i>Security</i>	All staff	Reporting							
Apply data quality principles to assess data or information, with reference to a specific purpose and requirements ~ <i>Data Quality</i>	All staff	Audit							
Deliver or arrange staff training with regard to applicable laws, policies and technologies – including specific systems or processes, applicable standards, best practices and business benefits of information management. ~ <i>Records Management</i>	Designated	Reporting							
Support and foster a culture within the team that promotes good information management practices ~ <i>Records Management</i>	Manager	Performance management							
Endorse and authorise information management standards, policies, guidelines and procedures ~ <i>Records Management</i>	Senior executive	Audit							

IM PRINCIPLE: SHARE Data and information are shared to streamline service delivery and reporting; to enable value adding; and support transparency			Commit to Customer service	Work Collaboratively	Influence and Negotiate	Demonstrate Accountability	Technology	Procurement and Contract Management
RESPONSIBILITIES	WHO	ACCOUNTABILITY						
Proactively publish or informally release as much information as possible, free of charge or at the lowest possible cost – according to agency policies and a published pricing schedule <i>~ Information & Privacy</i>	All Staff	Reporting						
Apply the appropriate licence for third party use of government information, defaulting to the most liberal and applying restrictions only where necessary to protect sensitive information or intellectual property rights <i>~ Information & Privacy</i>	All Staff	Audit						
Develop quality statements to describe the quality of a data item, dataset or statistical information <i>~ Data Quality</i>	Designated	Reporting						
Coordinate access to information internally and outside of the organisation, balancing business needs, privacy requirements and public interests. Handle requests and applications for release; manage reviews <i>~ Information & Privacy</i>	Designated	Reporting						
Implement controls to maintain the security of data and information exchanged with external entities; monitor the effectiveness of these controls <i>~ Security</i>	Designated	Audit						
Identify information sharing opportunities which can provide social, economic and / corporate benefits <i>~ Information & Privacy</i> <i>~ Records Management</i>	Senior executive	Reporting						

IM PRINCIPLE: MAINTAIN Data and information are maintained for as long as they have value then disposed systematically and accountably			Act with Integrity	Plan and Prioritise	Think and Solve Problems	Demonstrate Accountability	Technology	Procurement and Contract Management	Project Management
RESPONSIBILITIES	WHO	ACCOUNTABILITY							
Handle data and documents with care to avoid loss or damage; avoid or protect them from known hazards; do not remove them from agency sites / systems for extended periods of time or for unauthorised use <i>~ Records Management</i>	All staff	Performance management							
Dispose of information only when authorised <i>~ Records Management</i>	All staff	Performance management							
Dispose of data or information appropriately and, where relevant, according to an authorised retention and disposal authority; arrange and document the destruction of time expired data and information securely <i>~ Records Management</i> <i>~ Information & Privacy</i> <i>~ Security</i>	Designated	Audit							
Ensure appropriate environmental conditions and controls to monitor and prevent or mitigate hazards <i>~ Records Management</i>	Designated	Reporting							
Ensure information management and security requirements are incorporated into the design, purchase and maintenance of information systems <i>~ Records Management</i> <i>~ Security</i>	Designated	Reporting							

IM PRINCIPLE: MAINTAIN Data and information are maintained for as long as they have value then disposed systematically and accountably			Act with Integrity	Plan and Prioritise	Think and Solve Problems	Demonstrate Accountability	Technology	Procurement and Contract Management	Project Management
RESPONSIBILITIES	WHO	ACCOUNTABILITY							
Manage the ongoing accessibility of long-term data and information, through conversion, migration or transfer depending on legal requirements, business needs and historical value ~ <i>Records Management</i>	Designated	Reporting							
Prepare and execute business continuity or disaster recovery plans to protect critical systems and vital records, and ensure the timely resumption of business processes ~ <i>Records Management</i>	Designated	Reporting							
Implement cost-effective, risk-based measures to maintain the usability of data and information, for as long as they support service delivery and accountability requirements ~ <i>Records Management</i> ~ <i>Information & Privacy</i>	Senior executive	Reporting							
Ensure information management and security requirements are incorporated into business continuity and disaster recovery plans ~ <i>Records Management</i> ~ <i>Security</i>	Senior executive	Audit							

<p style="text-align: center;">CAPABILITIES OVERVIEW</p> <p>IM PRINCIPLE</p>	Act with Integrity	Commit to Customer Service	Work Collaboratively	Influence and Negotiate	Think and Solve Problems	Deliver Results	Plan and Prioritise	Demonstrate Accountability	Technology	Procurement and Contract Management	Project Management	Manage and Develop People	Inspire Direction and Purpose	Optimise Business Outcomes	Manage Reform and Change
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