

INFORMATION GOVERNANCE STRATEGY

SUMMARY

Purpose of this document

This Strategy concerns the governance of all information held or processed by the University of Sussex.

Who is this for?

This Strategy and the supporting policies which form the Information Governance Framework are intended for all individuals responsible for the use of information on behalf of the University, and all stakeholders with an interest in how the University manages its information.

The policies that are part of the Information Governance Framework provide specific advice and

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- ensure that 'the right way' is the easy way, and that staff are aware of their responsibilities;
- instil an information governance culture within the University so that it is part of everyday business;
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University's Council (through Audit & Risk Committee) that the institutional reputation is protected and provide a level of assurance to key stakeholders and partners, including the student community and wider society.

9. **Adequate resources are committed** - the scale and extent of the information managed by a contemporary university, and the complexity of the regulatory framework requires a higher level of resourcing than the historical norm.
10. **Staff are aware and trained** - rates of engagement with training have improved at the University in recent years, to reach a high level of compliance. It is good practice to regularly review quality of training and engagement.
11. **A development life cycle is required** - security risks and events occur throughout a system's lifetime, be that paper-

5. cyber-security and accessibility will be primary considerations in design of University business processes and systems; and
6. systems will be simplified and standardised where possible, enabling connections that encourage people to collaborate more closely and with more consistency.

5.3 The Strategy will deliver **benefits** from increased efficiencies and reduced risk through:

- improved control of valuable information assets;
- proactive compliance with legislation and standards;
- building confidence with stakeholders as a trusted business partner;
- better use of staff time through ease of location and retrieval;
- better use of physical and server space; and
- reduced costs of business processes and better services through more effective use of information ('make once use many').

6. INFORMATION GOVERNANCE FRAMEWORK

6.1 The Information Governance Framework comprises people, principles, policies and technical and organisational controls to help protect information, promoting openness but mindful of the needs and rights of individuals who entrust their personal data to the University and the requirements of other interested parties including funding and regulatory bodies.

6.2 Taken collectively, the existing suite of policies form a nascent Information Governance Framework. The parent-child arrangement of policies and associated procedures and guidance is helpful for navigation, and the policies are easily located on the University webpages. There is scope to further develop the University's information governance maturity through drawing together the existing suite of policies into a general framework that is informed by this Information Governance Strategy.

6.3 External drivers of the Information Governance Framework include the requirements of the Committee of University Chairs Higher Education Code of Governance that 'high-quality and robust data is produced and managed to meet all relevant legal and regulatory requirements and notes that the governing body must assure itself that it has 'effective arrangements in place for the management of information which meet ethical standards, Freedom of Information requirements and other legislation on the use and protection of data. Institutions are instructed to 'publish accurate and transparent information which is widely accessible

6.4 Similarly, the Office for Students identifies Public Interest Governance Principles that apply to all registered providers, which include:

- Accountability: The provider operates openly, honestly, accountably and with integrity and demonstrates the values appropriate to be recognised as an English higher education provider; and
- Risk management: The provider operates comprehensive corporate risk management and control arrangements (..) to ensure the sustainability of the provider's operations.

6.5 The Information Governance Framework provides the basis for the creation, capture, management and use of full and accurate records, information and data in all formats used by the University. It describes how information is to be governed as a vital business asset which is essential to help meet the University's business, accountability, legal and regulatory requirements.

6.6 The Information Governance Framework includes the following key policies which are made available on the University website, and are supported by a suite of policies, procedures and guidance notes:

- Information Classification and Handling Policy;
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Key Performance Indicators

7.4 Key performance indicators demonstrate to stakeholders and regulators that the investment in and focus on Information Governance is making a difference and improving the University's information governance capability and reducing risk. They also help inform conversations about future priorities.

7.5 They are a mix of input and output information governance indicators.

7.6 The following Information Governance Key Performance Indicators will be reported to the University's Executive Group annually:

- Completion of any mandatory Information Governance training to include data protection training and information security training;
- Information Security incidents by type;
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- SIRO will review the University's information governance risks and feed them into the

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